



October 28, 2011

To the Board of Governors of the California Community Colleges,
and the Members of the Task Force on Student Success:

I am writing to provide my personal observations about the California Community Colleges Task Force on Student Success Report [September 2011]. Like many of the Task Force members, I have committed my thirty-eight year professional career to the California Community Colleges. I have reviewed the document carefully and am convinced that the Task Force members are committed to promoting student success in our colleges. However, I also have a number of concerns regarding a general lack of analyses of the consequences of several of these recommendations. As a result, I strongly urge the Board of Governors to defer any action on this report until a detailed examination can be completed on the consequences of these recommendations. Taken together, these recommendations have the potential of substantially changing the mission and scope of course offerings of the California Community Colleges, the assessment standards for community college courses, and the funding model of California Community Colleges that will significantly impact individual colleges, their students, and the communities they serve. As a result, it is imperative that detailed analyses be conducted with sufficient time and involvement of California Community College professionals and representatives of the communities they serve to ensure a comprehensive, inclusive result that is in the best interests of the California Community Colleges and California residents.

My concerns are focused on eight specific points of the report which I have detailed below. The format used quotes the core recommendation from the report in bold black, the specific recommendation in red, and the quoted explanation from the Report in blue italics. My commentary about the specific recommendations follows in black.

1. Increase College and Career Readiness [page 16]

- 1.1 Collaborate with K-12 to jointly develop common core standards for college and career readiness.

“Community colleges will align standards and assessments with K-12 education so that students have consistent expectations and receive consistent messages about expectations throughout their educational careers about what it takes to be ready for, and successful in, college.

2. Strengthen Support for Entering Students [page 21]

- 2.1 Develop and implement common centralized diagnostic assessments.

“Community colleges will develop and implement a common centralized assessment for English reading and writing, mathematics, and English as a Second Language (ESL) that can provide diagnostic information to inform curriculum development and student placement and that, over time, will be aligned with the K-12 Common Core State Standards and assessments.”

Commentary: While the goal of establishing a common assessment system for the California Community Colleges is desirable, these recommendations align that assessment system with K-12 standards that have not been examined by college faculty to confirm that they are appropriate assessments of academic preparedness at the college level. These recommendations appear to be based on an assumption that if students complete the K-12 Common Core State Standards that they are academically prepared for collegiate success. In fact, past experience brings this assumption into doubt. The standards for academic rigor at the college level are established in concert with the transferring collegiate partners who will honor the credit earned at our colleges as being equivalent to the same course at their institutions. There is a danger that changing the assessment system to be based on K-12 standards rather than collegiate standards could lead to lowering of those standards. The only way to ensure that this unintended consequence does not occur is for the K-12 Common Core State Standards to be analyzed by college faculty to confirm their appropriateness. Without such a confirmation, there is a danger of assessing recent high school graduates based on elements that are not linked to the curriculum of the college courses they will enter.

3. Incentivize Successful Student Behaviors [page 31]

- 3.2 Require students receiving Board of Governors fee waivers to meet various conditions and requirements.

“Unlike federal and state financial aid programs, the community colleges do not require students to make satisfactory academic progress, make progress toward a goal, or limit the maximum number of units covered by the award.... By enacting accompanying BOG fee waiver changes, low-income students who rely on the waiver will be provided the same level of and held to the same standards as other students.”

Commentary: The recommendation seeks to treat recipients of the Board of Governors fee waiver grants in the same manner as students who are receiving federal financial aid. While the appeal to equitable treatment is understandable, I urge reviewers to keep in mind that our BOG students are among our most vulnerable. The majority of BOG students are first generation college students who must work, are raising families, and are engaged in major life-changing experiences while they attend our colleges. The unintended consequence of this recommendation is that this group of students who most need our assistance may be blocked from pursuing their education due to an inability to adhere to described standards due to influences beyond their control. I urge reviewers to engage in a review of the likely consequences of this recommendation through analysis of MIS data before taking any action.

4. Align Course Offerings to Meet Student Needs [page 37]

- 4.1 Focus course offerings and schedules on needs of students.

“Amend statute and Title 5 regulations to reflect that apportionments may only be claimed if scheduled courses are part of student education plans.

Amend statute (Education Code 78300) and Title 5 as needed to explicitly allow colleges to enroll community service students in otherwise state-supported credit classes, where there is excess capacity in those classes.”

Commentary: This recommendation reflects a major departure from the current mission of the California Community Colleges. By eliminating apportionment for all courses that are not a part of an approved student education plan, the recommendation removes funding for all students who are pursuing discrete educational goals that do not result in an award. This category includes students with many viable educational goals, especially large numbers of incumbent workers who must periodically update specific skills to remain competitive, often serving the very large number of small businesses in our communities. These students enroll for a limited number of courses with no award because it meets their needs. The recommendation appears directed to elimination of apportionment for recreational courses, but its approach is too broad to avoid unintended negative consequences. In addition, such a marked departure in mission deserves broad discussion, not only within the colleges but also with the communities we serve. The impact will be disproportionate throughout the state. Several colleges have large life-long learning components and cultural programs that serve specific demographic characteristics of their communities. These colleges will be heavily impacted. The proposal to allow co-enrollment of apportionment and community service students in the same class will create severe administrative challenges and create a need to negotiate revised collective bargaining agreements. Revenue for each class will have to be computed after enrollments are known with one percentage of apportionment students and another percentage of community service students. Recent revenue reductions have caused reductions in support staff, and this recommendation will create additional staff impact without funding to support it. Encouraging co-enrollment of apportionment and community service students assumes that community service instructors meet minimum qualifications. Considerable examination is needed before any decisions can be made regarding this recommendation.

5. Enable Efficient Statewide Leadership & Increase Coordination among Colleges [page 55]

- 7.2 Set local student success goals consistent with statewide goals.

“In collaboration with the CCC Chancellor’s Office, districts and colleges will identify specific goals for student success and report their progress towards meeting these goals in a public and transparent manner (consistent with Recommendation 7.3).”

Commentary: The establishment of transparent goals for student success is an important element of accountability and one the colleges embrace. At present, we adhere to the ARCCC requirements and use those results to assess our relative progress. If this recommendation can refine that process, it would be welcomed. However, recommendation 7.2 exceeds the goal of refining a goal and assessment system, leading to recommendations 7.3 and 8.2 which essentially implement outcome-based funding.

- **7.3 Implement a student success scorecard.**

"In order to increase both public and institutional attention on student success, the California Community Colleges will implement a new accountability tool that would present key student success metrics in a clear and concise manner... The success metrics included on the score card would measure a variety of student outcomes, including successfully reaching "momentum points," such as completion of a basic skills sequence and earning specified thresholds of units, which have been shown to lead to successful program completion. In calculating gains in performance, each college would be compared against its own past performance, thus neutralizing differences associated with local economic and demographic variables. These success measures would include intermediate as well as completion outcomes. Examples of intermediate outcomes include: rate of earning 15 units, 30 units and 60 units; rate of completion of a college level (degree applicable) course in math and English; basic skills improvement rate; rate of term-to-term persistence; and ESL improvement rate. Completion outcomes would include earning a certificate, an associate degree, and transferring to a four-year institution. The Chancellor's Office will develop score card metrics and format, in consultation with internal and external stakeholders."

Commentary: This recommendation has merit as an extension of existing accountability tools such as the ARCCC. However, despite recommendation 8.4 to not implement outcomes-based funding at this time, recommendation 7.3 defines outcomes, here called "momentum points" which are then used in later recommendations to determine funding for the colleges. This action, coupled with the recommendation to defund all courses not included in an individual student education plan, effectively re-engineers the California Community College funding mechanism without adequate examination by the colleges' chief business officers, chief instructional officers, and chief executive officers to understand what the impacts will be. The chances for extremely negative consequences are quite high, necessitating a very careful examination before implementing any changes.

6. Align Resources with Student Success Recommendations [page 65]

- **8.2 Invest in the new Student Support Initiative.**

"Beginning with the 2012-13 State Budget, the first priority for new monies appropriated to the system would be to augment the Student Support Initiative. Receipt of these funds by a district would be conditioned on the district developing and submitting to the Chancellor's Office local student success plans that are consistent with state and local district goal setting (as outlined in chapter 7) and address student equity impacts. Plans will identify specific strategies and investments over a multi-year period. Further, as a condition of receiving Student Support Initiative funds, districts would be required to implement the common assessment proposed in Recommendation 2.1 and the accountability score card described in Recommendation 7.3."

Commentary: This recommendation mandates as a first priority the allocation of new monies to the Student Support Initiative, despite the fact that the colleges have experienced revenue declines through workload reductions in recent years. Those reductions have forced colleges to turn away students who need access to educational opportunities. The restoration of the workload levels should be addressed prior to implementation of a system that requires further review to understand its consequences. In addition, this recommendation mandates acceptance of the common assessment system which is based on K-12 standards rather than collegiate

standards and implements a form of outcomes-based funding without conferring with the faculty and research groups to adequately understand its impact.

- **8.3 Promote flexibility and innovation in basic skills through an alternative funding mechanism.**
“Rather than having ‘seat time’ as the dominant driver in basic skills funding, the development and implementation of an alternative funding model would reimburse colleges for successfully moving students from below college level to college level. This approach would allow districts to innovate and develop programs built around student needs rather than the standard FTES allocation model.”

Commentary: This recommendation reflects an enormous departure from apportionment to incentivized funding. Prior to consideration, substantial modeling is required to project the consequences of this change. Faculty have consistently expressed concerns about incentivized funding impacting academic standards since the institutions would be rewarded by moving students through the college curriculum, creating a potential conflict of interest. The recommendation to examine alternative funding models should not be limited only to the consideration of incentivized funding. Through recommendation 8.4, the Task Force recommends not implementing outcomes based funding at this time. In fact, several of the current recommendations outline a form of outcomes-based funding without examination of whether outcomes-based funding should ever be implemented.

I applaud the hard work accomplished by the Task Force and welcome the extended dialogue called for in this letter. That dialogue must include the professionals on campus and representatives of the communities they serve. Without such dialogue, we will be guilty of not adequately analyzing the impact of our decisions on how we expend public funds.

I appreciate your careful attention to my comments.

Sincerely,



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