November 7, 2011

Dr. Jack Scott, Chancellor
California Community Colleges
1102 Q Street
Sacramento, CA 95811

Re: Student Success Task Force (SSTF)

Dear Chancellor Scott:

The Faculty Association of California Community Colleges (FACCC) lists among its core values *commitment to student access, opportunity, and progress* and sees community colleges as a driving force for economic growth and social cohesion. We are therefore passionately concerned, as you know, with student success, and we support all efforts on the part of the State Chancellor's Office and the Legislature to make the California Community Colleges better places to teach and learn.

The *Draft Recommendations of the Student Success Task Force*, published September 30, 2011, have not been well received by faculty throughout California; despite what are clearly good intentions, the document appears deeply flawed, with many suggestions that have not been adequately tested against the realities of our diverse learning communities, which faculty are often in the best position to understand and communicate.

As faculty throughout California have reviewed the Task Force's recommendations, we have determined that taken together, they represent a significant narrowing of the community college mission, and such sweeping changes should not be endorsed by the Chancellor's Office or by the Board of Governors without substantially more time for public discussion, review, and particularly faculty input.

We note that many of the system's key needs are not adequately addressed by the recommendations, including restoring both general and categorical funding (cut during the current economic downturn); increasing the number of full-time faculty; professionalizing part-time faculty positions; and addressing student equity gaps.

Furthermore, the recommendations appear to advocate a general shift away from local decision-making towards more centralized authority, which is exactly the wrong approach to education-reform. System-wide goals are valuable, but classroom faculty and counselors are in the best

position to respond to the specific needs of local students and communities. Scheduling, registration priority, even professional development, must be guided by local needs.

Even some of the most seemingly straightforward proposals, like adding a unit-cap for the purposes of financial aid or priority registration, can look quite different from the perspective of an EOPS counselor (who knows how many units an underemployed "member of the working poor" can accumulate while trying to better his or her situation) or a professor whose department offers a "high-unit major."

FACCC strongly urges you to consider carefully both the general concerns and specific suggestions offered by faculty throughout the State in response to the SSTF plan, and to recommend more time for reconsideration and revision in light of these responses before you consider endorsing any proposal to the Legislature.

A partial list of FACCC's specific responses to individual SSTF recommendations are as follows:

1.1   A significant lack of counseling resources in California middle schools and high schools is part of the problem that should also be addressed. Colleges should not adjust standards to meet K-12 needs. Rather, high schools should be better informed of college-level expectations and provide support and resources to help students better prepare for college or career. This recommendation has more to do with improving support to high schools (and middle schools) than it does with improving our colleges.

2.1   We see some potential advantage to a common assessment tool so long as local faculty are the ones to decide how that tool is used in terms of cut-off scores and placement.

2.2   Community colleges today lack the infrastructure to implement this plan without significant new resources and time. We fully support the idea of investing more time and money in helping students understand and navigate their options. Nevertheless, where will the money to support this plan come from?

Students should be free to deviate from education plans and have the ability to change them as needed as they progress. Community colleges should continue to focus on general education and to offer the first two years of a four-year college experience. This includes providing broad opportunities for exploration, growth, and change. Even advising must be about more than a single track (not just about IGETC) but about a range of academic choices.

2.3   Online services have obvious value, but technology can too easily create schisms between students, many of whom do not have access to smart phones and tablets. The report overestimates the technological literacy of our students and underestimates the cost of customization of online service programs at the local level.

Creating smart applications is a good idea so long as it does not come at the expense of (or be expected to replace) academic advising and counseling. Online technology cannot replace

counseling services. Frustration with technology can also deter students from seeking and receiving the help they need.

2.4   Implementing this recommendation would likely conflict with constraints related to the new SB 1440 degrees and transfer degree requirements. In addition, requiring new courses raises immediate funding concerns. The proposed classes may have merit, but not at the expense of other courses.

2.5   This recommendation seems geared towards a full-time student who is not our typical student (what constitutes the "second term" for a part-time student?). Clearly, there are benefits to students defining educational goals and selecting a pathway early in their college careers. However, penalizing students for not choosing a major would be inappropriate. Overall, we lack the resources to implement this recommendation.

3.1   We agree that registration priority is a key way to influence student behavior, but decisions should be made locally because of diverse variables that change from college to college.

3.2   This punitive proposal would undermine our core mission by denying access to the neediest students in our system. Wealthy students under this proposal would have better access to public education than those lacking means. This flies in the face of the very concept of community colleges. BOG fee waivers are a key component to the success of our colleges, and this plan would undermine our ability to serve students. We should not increase student-success statistics by reducing the number of high-need students. We oppose the part of this recommendation that would restrict access to students who struggle in college.

Returning students and students seeking career advancement should be able to get BOG fee waivers. The 110-unit cap does not seem to respond to a real problem. Moreover, the potential for doing damage to students who are legitimately trying to improve their situation through education seems to outweigh whatever benefits the cap would create.

3.3   The recommendation notes why many students are unable to attend full-time but does not recognize negative messages a college or the system might send to part-time students.

3.4   The cost of implementation here worries us. We must not shift resources to afford this plan so that increased offerings in basic skills come at the expense of our college-level offerings. With increased resources, expanding basic skills offerings to allow students to address those needs early is a good idea.

4.1   The suggestion that colleges and faculty are not already scheduling to best meet student needs is unwarranted, especially in the face of declining funding and the recent loss of classes. This proposal would create a two-tiered structure allowing students with money to have better access to public education and a broader range of educational choices than students without. Additionally, students cannot always secure access to the classes they want or need in the current atmosphere of reduced schedules; oftentimes students may be forced to take a class outside their plan.

Mandating any universal scheduling system based on a particular trend or data source neglects the genuine complexity of such decisions and devalues the input of local faculty who are in the best position to understand the needs of local students and local communities.

Student education plans should be based on a broad range of opportunities; those opportunities should not be based on the education plans. This proposal would also inhibit the creation of new courses. It would keep faculty from adjusting schedules and programs to respond to local needs.

5.1   This recommendation implies that faculty have been uninterested in innovation; faculty are always interested in innovation and improvement. We do not need a new policy to encourage innovation. "Incentivizing" will create unequal opportunities for students and is a step towards some type of performance-based funding, which is rejected in Recommendation 8.4.

6.1   We support professional development, but it should not be directed by the State Chancellor's Office. We oppose requiring specific professional development activities of faculty. This is a matter for collective bargaining.

7.1   The idea of strengthening the State Chancellor's office is not directly connected to student success. It should be a separate conversation.

7.2   Reports like the *Accountability Reporting for Community Colleges* (ARCC) are important, but steps must be taken to reduce, not increase, required paperwork. Colleges, and especially faculty, should not spend more time reporting on plans than actually planning and implementing plans. Reports and scorecards must continue to be separate from general college funding.

7.4   We support the idea of a longitudinal student record system -- if new funding can be made available for database creation and maintenance.

8.1   We oppose consolidating categorical programs and note that this recommendation essentially seeks to undermine system-wide goals that have already been approved by the Legislature. The recommendation to group categorical programs under the headings of "Student Success" "Faculty Support" and "Workforce Development" is ill-advised. Supporting faculty by funding part-time office hours, for example, or encouraging diversity and equal opportunities in hiring contributes directly to student success, as do Career-Technical programs and apprenticeships. Ironically, the proposed *Faculty Support Initiative* could eliminate part-time faculty office hours, which are essential to the student learning experience. Moreover, there is no clear nexus between equal employment opportunity in the part-time faculty categoricals -- they should not be clustered within a single block grant. Categorical funding for these crucial programs should be *restored*, not reorganized.

8.2   The suggestion that beginning in 2012-13, new monies appropriated to the system should go first to funding the Task Force's recommendations might make sense if the recommendations reflected a consensus within our system (which is certainly not yet the case), but not while our system is turning away more than 670,000 students. Our first financial priority must be to restore

the funding cut so severely during the current economic crisis, and to give districts a chance to catch up to "cost of living" increases. Until our system recovers and stabilizes, we should not be prioritizing new databases or education-plan applications or other potentially good ideas contained in the recommendations. The Student Success Task Force, after all, was not charged with debating funding priorities within the system, and the notable lack of discussion of established system goals, like the 75/25 full-time/part-time faculty ratio goal, indicate that setting funding priorities based exclusively on the Task Force suggestions would be a mistake.

8.3   This suggestion to apply an outcomes-based funding model to basic skills seems to contradict Recommendation 8.4. It is also unnecessary and ill-advised. Restoring the categorical funding to Basic Skills would do more to encourage and support innovation in this area than shifting to a performance-based funding model. Our faculty do not lack motivation to help their students succeed; they lack direly needed resources.

8.4   FACCC supports the recommendation not to implement performance-based funding, however, we recommend that the phrase, "at this time" be deleted from the language.

We thank you for this opportunity to respond to the draft recommendations of the Student Success Task Force (SSTF). FACCC's governing board will be meeting later in November, at which point we may follow up with subsequent correspondence responding to further changes in the document.

Please contact me should you have any questions.

Sincerely,

Dennis Frisch
President

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