

Community College Association CCA / CTA / NEA

Revised Version
December
Recommendations



Community College Association Feedback Regarding

California Community Colleges Student Success Task Force Recommendations



December 2011



Community College Association (CCA/CTA/NEA)

Response to the Report of the California Community Colleges Student Success Task Force Distributed December 1, 2011

The California Community Colleges Mission Statement

(1) The California Community Colleges shall, as a primary mission, offer academic and vocational instruction at the lower division level for both younger and older students, including those persons returning to school. Public community colleges shall offer instruction through but not beyond the second year of college. These institutions may grant the associate in arts and the associate in science degree.

(2) In addition to the primary mission of academic and vocational instruction, the community colleges shall offer instruction and courses to achieve all of the following:

(A) The provision of remedial instruction for those in need of it and, in conjunction with the school districts, instruction in English as a second language, adult noncredit instruction, and support services which help students succeed at the postsecondary level are reaffirmed and supported as essential and important functions of the community colleges.

(B) The provision of adult noncredit education curricula in areas defined as being in the state's interest is an essential and important function of the community colleges.

(C) The provision of community services courses and programs is an authorized function of the community colleges so long as their provision is compatible with an institution's ability to meet its obligations in its primary missions.

(3) A primary mission of the California Community Colleges is to advance California's economic growth and global competitiveness through education, training, and services that contribute to continuous work force improvement.

(4) The community colleges may conduct to the extent that state funding is provided, institutional research concerning student learning and retention as is needed to facilitate their educational missions.

[from California Education Code Section 66010.4 (a) , as of 10/19/99]

Dear Task Force,

Thank you for the additional work that has been done regarding this document. The Community College Association appreciates your time and effort and your commitment to the California Community Colleges. After reexamining the Community College Master Plan, we feel the recommendations from this Task Force move us in a direction that is not compatible with many stakeholders within the community college system.

The Community College Association is concerned with many of the recommendations made by the Task Force. It is our role to anticipate the consequences of such a comprehensive restructuring of our system. It is also our role to alert the public and our members to evidence that the Task Force may be unaware of that we, as faculty, experience every day on our college campuses and the significant shortcomings in the provisions for implementing these changes. It will become part of our task to speak to legislators, students, Board of Trustees, and the general public against certain recommendations. **The Community College Association asks that the 79 concerns expressed in our document be considered by the Board of Governors before accepting the recommendations from the Task Force.**

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. However, the second version of the document deletes that section.

CCA believes that the estimated system savings of approximately \$89 million dollars in programs outlined within the Task Force recommendations are additional unrestricted funds and would be subject to collective bargaining.

CCA believes that the offering of additional courses, laboratory courses, and other new approaches to skilled learning opportunities are changes in working conditions and would be subject to collective bargaining.

CCA believes that many of the recommendations included in the report will require legislative action and would result in a realignment of Prop 98 funds in contravention of the State Constitution. CCA also believes any transfer of these funds directing how they are spent is subject to collective bargaining. CCA also believes such a maneuver action would weaken the 50% law that specifies these funds be spent on faculty and classroom staff for educating students within the classroom and not for administrative type of activities.

CCA believes certain recommendations mandate a dual track fee structure for community college students and that policy would be ill advised and discriminatory. This concept rings of AB 515 (Brownley).

CCA believes any attempt to implement Student Learning Outcomes or anything that appears to be additional work for faculty as mandated actions of the colleges without compensation to faculty would constitute a maneuver to bypass the collective bargaining process. 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.

In addition to the above mentioned findings, there continues the following six major concerns with the content of the recommendations outlined in your second Report distributed December 1, 2011:

1. The recommendations outline a program that, if initiated, would move many of the powers currently held by local districts to the Community College Board of Governors and Chancellor's Office. This structure would be closer to that of the University of California and the California State University, in the sense that it would centralize functions such as assessment, course offerings, and faculty professional development. CCA does not believe this to be the direction our constituents want the system to move.
2. If the recommendations were to be finalized, Proposition 98 funds would be drastically redistributed away from students and instruction and toward the Chancellor's Office and projects that cannot be guaranteed to assist students to be more successful than the current polity. In difficult economic times such as these, the expectation that the California Legislature would appropriate additional funds for these programs is overly optimistic. Proposition 98 funds would certainly be used to pay for increased Chancellor's Office costs.
3. A program designed to realign decision making to the Board of Governors and the Chancellor's Office would take autonomy away from the local districts and their Boards of Trustees. This would significantly alter the mission of the California Community College System and would violate the commitment to local control of community colleges.
4. There is no consistent and dedicated enforcement of funding mechanism established to make the recommendations feasible.
5. A highly controversial definition of "student success" in this Task Force Report is a matter for grave concern. While the Report acknowledges that some students may not have either transfer or CTE certification as goals, students who have other goals will not be accommodated in this new system as the Task Force Report is currently written. For example, many students attend community college only for the purpose of increasing their English skills. How does this Report honor these students' goals? There is not written documentation that specifically deals with this concern. At the December 7, 2011 meeting, the Chancellor and members of the task force asserted that mechanisms for counting these students as successful would be included. CCA is confident such language will appear in the final document.
6. The loss of the community service and lifelong learning functions of the community colleges is a tragedy which we deplore. Because of a temporary economic downturn, one of many in the history of the United States, the Task Force is prepared to reduce or completely abolish these components of California Mission Statement, enshrined in the California Master Plan for Higher Education.

CCA would like to highlight (79) specific concerns that must be addressed by the Board of Governors before accepting the recommendations of the Task Force in January 2012.

Page 10: CCA appreciates that the Task Force adopted a set of Student Success Outcome Metrics and recommends the system to define success using the following metrics: Number of degrees and certificates earned: Number of students transferring to a four-year institution after completing a transfer curriculum: Percentage of community college students earning a certificate or degree, transferring, or achieving transfer-readiness within a 6-year period: and Percentage of students successfully completing courses.: **However, CCA believes that these definitions are arbitrary, self-selected to meet the Chancellor's Office own internal definition(s), and not representative of the entire Community College Mission Statement. The remainder of the report offers no strategies for measuring "success" for students who have alternative goals such as course completion.**

Page 10: 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. Interestingly, on the current online application used by all California community colleges, the first objective listed is "Completion of an Associate's Degree and Transfer to a Four-Year Institution." It appears that an assumption is made that students seek transfer over certificate or "undecided" is the case at hand. Perhaps we need to list "Undecided" first to see if the current outcome stays the same. Important statistical questions need to be asked for internal discussion and review before the final plan is adopted.**

Page 11: states under definition of student success, "Successful completion of first 15 semester units; Successful completion of first 30 semester units." **CCA believes that a tremendous majority of students may not want to receive 15 semester units and even a larger number of students may not want to receive 30 units. Students such as working police officers, firefighters and nurses who take one or two courses for continuing education to maintain their licenses are successful. Students who take two business courses so they can be better small business owners are successful. Students who take on "Business Speech" course so they can make better reports on their jobs are successful. Students who take two ESL courses so they can be promoted in their current job are successful. Yet, these students are invisible in the definitions that are actually written in the report. The issue at hand is how many of our students enroll for 1-12 units of training?**

Page 11: states under A Commitment to Equity, "The goal of Equitable access- and the importance that all students achieve success – is a driving force behind the recommendations contained in this report. Success is defined by the Task Force as increasing the share of students from all demographic and socioeconomic groups who attain a certificate, degree or transfer to a four-year college or university." **CCA believes that once again the Task Force has defined the mission statement of the Community Colleges very narrowly.**

Page 12: states under Fiscal Context, “For many decades, lean funding has forced an overreliance on less expensive part-time faculty and resulted in too few counselors and advisors.” **CCA believes sufficient data exists to prove that when adequate funding was available for the community colleges, the Districts refused to hire additional full-time faculty. Instead, they balanced the budget on the backs of the underpaid part-time faculty teaching pool. This says nothing about the over 1 billion dollars sitting in unrestricted reserves within the 72 districts.**

Page 12: states under Fiscal Context, “Deep cuts to categorical programs in the 2009-10 State Budget reduced by roughly half the funding available to support critical student services such as counseling, advising, assessment, and tutoring.” **CCA believes that providing flexibility to each of the Districts on how to transfer and utilize categorical funding allowed each District to meet their individual student needs. Again, this issue does not address the 1 billion dollar reserves that would have allowed Districts to fund the programs had they chosen to do so!**

Page 12: states under Fiscal Context, “...with additional funding, would serve many more Californians and be more successful at helping students attain their educational objectives.. In particular, additional funding would allow the colleges to hire more full-time counseling and instructional faculty, and student support personnel...” **CCA believes that data from the Chancellor’s Office from prior years demonstrate that even with additional funding, Districts failed to hire additional counseling faculty. There are no guarantees this would happen under the proposed Task Force recommendations. The Task Force chose not to deal with the 50% law which is often voiced as the justification this has not happened.**

Page 12: states under Fiscal Context, “Additional investment in the community colleges on part of the state will be essential for California to reach levels of educational attainment needed to be economically competitive. **CCA believes the Task Force recommendations fail to demonstrate any enforcement mechanism that would be responsible for gaining any additional funding, therefore, rendering the recommendations as only rhetorical and theoretical in nature.**

Page 13: states under Fiscal Context, “In the absence of additional funding, however, the task force recommendations make good policy sense and will help ensure that the community colleges are leveraging all available resources to help students succeed.” **CCA believes that without enforcement mechanisms that leveraging all available resources cannot be accomplished because of the unilateral nature that would have to take place. This collective bargaining issue must be dealt with on a timely basis. CCA also believes that the Task Force recommendations if not funded don’t necessarily “make good Policy sense.”**

Page 13: states under National and State Student Success Efforts, “...the work of the Student Success Task Force builds on other state-level reform efforts. Notably, the Community College League of California’s recent Commission on the Future report served as a basis for many of our recommendations, as did prior community college reform efforts, including the Partnership for Excellence program and various reviews of the California Master Plan for Higher Education.” **CCA believes that a concern exists regarding the validity of this statement since the Community College League organization has not endorsed the recommendations set forth by the Task Force paper.**

CCA believes that by using a claim of reform effort found in the Partnership for Excellence program which has been defunct for decades and was very contentious the few years it was activated does not ring true as convincing argument for these recommendation. Finally, CCA believes that all of those individuals who created the Master Plan for Higher Education would be disappointed in that the vehicle for higher educational that was once envied by the rest of the United States is being used to further erode the education that should be available to all students seeking advancement.

Page 14: states under chronology of this effort, “To foster public input, during October and November, (2011) the Task Force held a series of public town hall meetings, made presentations to dozens of community colleges stakeholder groups, and hosted a lively on-line dialogue. Over six weeks, the task force heard from both supporters and critics of the recommendations and received substantial input that has been used to inform its deliberations. The input helped shape the final recommendations and elevated the public discussion about improving outcomes for college students.” **CCA believes that the discussions were healthy in nature, but that the majority of the stake holders, students in particular, did not have sufficient time to respond. CCA also questions which Task Force members rewrote the report that was distributed to the Board of Governors? These recommendations were presented before the Task Force meeting scheduled for December 7, 2011. CCA also finds it problematic that additional positions and arguments appearing in the later document were not discussed previously before the Task Force.**

Pages 14 & 15: states under chronology of this effort, “...the three substantive changes to the draft recommendations (are).” **CCA appreciates and applauds the Task Force for these changes.**

Page 16: 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. 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 16: states under Implementation Processes, “After approval of this report by the Board of Governor’s a separate document, authored and distributed by the Chancellor’s Office, will be developed and will lay out various strategies for implementing the recommendations contained with this report.” **CCA believes that at such time it will become imperative to ask for representation of both the Community College Association/California Teachers Association and the Community College Council/California Federation of Teachers to participate in any strategy development to ensure collective bargaining issues are dealt with in a fair and inclusive manner. Combined, these two bargaining unions represent 88 percent of the faculty and students attending said colleges.**

Page 18: states under Increase Student Readiness for College, “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 skills, 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. CCA would also like clarification as to what percent of the 11th grade students take the Early Assessment Program (EAP) test?

Page 19: states under Increase Student Readiness for College, “The State Board of Education (SBE) adopted the Common Core State Standards (CCSS) in August 2010 and joined the Smarter Balanced Assessment Consortium in May 2011 to develop a new K-12 assessment system based on the CCSS. Under federal requirements, the new 11th grade assessment must include an assessment of college and career readiness.” **CCA believes that federal requirements should be followed and that deciding not to participate should result in loss of financial incentives. CCA believes that financial compliance is of top priority regarding the integrity of the Districts. Unfortunately, without punitive financial results for compliance, some Districts may not choose to participate. Some currently decide to participate in certain legislative mandates based on the consequences of not complying.**

Page 21: 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. There are no consequences if K-12 does not participate.**

Page 23: states under Assessments Vary by College, “Grant funding was obtained from the Bill and Melinda Gates Foundation and the William and Flora Hewlett Foundation to complete a common assessment feasibility student.” **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 24: states under the Assessments Vary by College, “The CCC Assess advisory committee will be reconvened to determine how to move forward to implement the legislature’s direction that the system implement a low-cost assessment as an interim step toward achieving the Task Force’s vision.” **CCA believes that Consultation should be part of that committee and that individuals from each of the stakeholder groups be appointed to the reconvened CCC Assessment Advisory Committee.**

Page 24: states under the section Guidance is Key to Student Success, “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% or greater and adding Counseling faculty as well as librarians. It is time to stop saying it is important for students to have access to a counselor and not be willing to hire more employees to facilitate this goal.**

Page 24: states under Every Matriculating Student Needs an Education Plan, “ Every student who enrolls to pursue a certificate, degree or transfer objective, and in many cases even those seeking career advancement, needs a Student Education Plan that represents the sequence of courses that can get them from their starting point or attainment of their educational goal. **CCA believes that forcing even those students who only wish to take one class to assist them with their job advancement seems unrealistic and burdensome for the system.**

Page 25: states under Technology Can Help, “The creation of online resources that would support advisement and allow many students to self-manage their academic pathways is essential.” **CCA believes that just because a student can use a computer for basic typing, owns a “Droid,” carries an ipad, and uses his/her phone for texting does not equate to the capability to manage their academic pathways. CCA believes that faculty must be the conduit to successful student participation in the educational program.**

Page 26: states under Technology Can Help, “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 26: states under Need for More Counselors, “However, some students will still need the face-to-face interactions provided by advisors and counselors. By shifting the lower-need, self-directed students to online tools we free up advisors and counselors to focus their face-to-face interactions with those students who lack access to technology or are not adequately prepared to utilize it and those who need more complex interactions with a counselor.” **CCA believes that there is no delineation and clarification of which students meet any of these classifications. It appears that the word “some” as applied here is not realistic or well founded. Again, CCA believes that faculty must be the conduit to successful student participation in the educational program.**

Page 27: states under Requirements for Implementation, “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 27: states under Requirements for Implementation, “After development of the diagnostic assessment, amend Education Code Section 78213 to require colleges to use the new common assessment for course placement while allowing districts to supplement common assessment with other validated multiple measures.” **CCA believes that statement contradicts the second part of the sentence from the first part. CCA is concerned that one can require a college to use a specific assessment, but then turn around and allow for districts to use other validated multiple measures. Not one single person knows the degree of utilization that will take place.**

Page 28: under Requirements for Implementation, “One-time funds of \$1 million (already secured from outside sources) together with dedicated state-level funding of approximately \$5 million would enable the Chancellor’s Office, working with the CCC Assessment advisory committee, to conduct a centralized procurement using state level buying power to drive down the cost of assessments while leveraging some customization thus providing unlimited assessment capacity to colleges at low or no cost.”

CCA believes that the \$1 million (outside sourced) funds will come with strings attached and not be freely accessible to be used as needed. CCA believes the additional \$5million would come from Proposition 98 funds and that is problematic without collective bargaining taking place. CCA also believes that it is unwise to suggest the revised CCC Assessment advisory committee will automatically decide to enforce this recommendation. There is no statistical data to support the assertion of reduced or no cost for assessments.

Page 28: states under Requirements for Implementation, “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 29: states under Recommendation 2.2, “By requiring students to participate in these core services, the community college system will ensure that students have the foundational tools necessary to make informed choices about their education... Education Code section 78212 and Title 5 section 55500 ff. already require colleges to provide these and other matriculation services to all non-exempt students (if funding is provided for that purpose.)” **CCA believes the recommendations of this Task Force report do not carry any mandates that Districts must follow. CCA also believes that Education Code and Title 5 regulations already provide an avenue for this particular recommendation to be accomplished.**

Page 29: states under Requirements for Implementation, “Please note: The Task Force recognizes that implementation of this recommendation requires; (1) a substantial reallocation of existing local resources; (2) additional resources, and (3) new modes of service delivery in order to make these required services available to all incoming students.” **CCA believes these recommendations certainly deal with collective bargaining issues regarding substantial reallocation of existing local resources (Proposition 98 funds) and additional funding (resources). CCA believes that creating new modes of service delivery (faculty assignments) would also come under the collective bargaining agreement with the Districts.**

Page 30: states under Recommendation 2.3, “Thoughtfully designed online technology will enable students to guide as much of their own education planning as is appropriate for their level of technology access and skills and their ability to choose and follow an appropriate pathway.” **CCA believes that no quantified data can support such an assertion. There are too many variables in place that do not measure individual levels of technology access and skills that any definition of an appropriate pathway is an unknown product.**

Page 31: states under Requirements for Implementation, “A centralized development and procurement process would leverage the system’s size to drive down the estimated annual cost of the project to approximately \$12 million.” **CCA believes that even if one accepts this cost reduction from \$89 million (first draft of recommendations) is accurate, the \$12 million cost must come from either Proposition 98 funds (subject to collective bargaining) or an additional funding source that is not identified or probable.**

Page 32: states under Recommendation 2.4, “Require students whose diagnostic assessments show a lack of readiness for college to participate in a support resource, such as a student success course, learning community, or other sustained intervention, provided by the college for new students...A student success course would likely need to be provided in a noncredit format in order to avoid issues related to cost or financial aid.” **CCA believes that the Task Force never establishes the acceptable diagnostic assessment and cannot mandate one specific assessment because of collective bargaining issues dealing with faculty workload and compensation. The statement concerning noncredit format is simply a request with no enforcement mechanism.**

Page 36: states under Incentivize Successful Student Behaviors Rationing of Classes, “...the state has failed to live up to that commitment (Master Plan for Higher Education for California) and we as a system are rationing access to education.” **CCA believes that the Chancellor’s Office should be responsible for advocating on behalf of the Master Plan and begin to live up to that commitment. CCA also believes that the students of California should consider suing the State for rationing access to education.**

Page 36: states under Enrollment Priorities, “In the 2009-10 academic year, approximately 137,000 first time students were unable to register for even a single course due to their low placement in the registration queue.” **CCA believes the statement as written is an exaggeration. Does this statement mean that all classes taught at the community colleges in California were 100% full?**

Page 37: states under Adopt Consistent Policies for Enrolling Students, “...adopt enrollment management policies that...are most likely to lead to completion of a certificate, degree, transfer, or career advancement goal.” **CCA believes that the Task Force has reiterated only a three prong approach to one definition of student success. Certainly the Master Plan finds multiple definitions in addition to the three continually outlined by the Task Force.**

Page 38: states under Recommendation 3.1, “Current law and practice guiding student enrollment tends to favor the continuing student, based solely on their accrual of course units.” **CCA believes that statement to be inaccurate and false in nature. Many of the community colleges provide early registration to students participating in athletics, associated student body participation, extra-curricular activities like (forensics, band, choir, former members of the Armed Forces, disabled and disadvantaged students, EOPS students, and current and former foster youth) to name just a few.**

Page 38: under Highest enrollment priority should be provided for: “ Continuing students in good standing who are making progress toward a certificate, degree, transfer or career advancement objective (including incumbent workers who enroll in a course that develops skills required to retain their job or advance their careers.)” **CCA believes this new priority enrollment system to be similar to the current accrual of course units. It isolates to some degree what might appear to be different students. However, there is no documentation to suggest the number of new students to benefit. Regarding the incumbent workers enrolling in a single course, there is no mechanism developed to allow, track, enforce, or celebrate such an endeavor.**

Page 40: states under Recommendation 3.2, “Require students receiving Board of Governors (BOG) Fee Waivers to meet various conditions and requirements, as specified below. “ **CCA believes such mandates would increase the potential for litigation from BOG Fee Waiver students. Unilaterally changing the process within the California Community Colleges will be difficult.**

Page 41: states under Recommendation 3.3, “The faster a student completes his or her education the less time there is for life or family issues to get in the way...students benefit by increasing their earning potential sooner...colleges benefit from the greater efficiency of serving one full time student versus two or more part time students for the same funding.” **CCA believes that community college demographics find the majority of students are part time because they work, have family obligations, are returning from the military, and try to balance some college with a full time job. Certainly the Task Force recommendation of full time status does not change family issues. Also if only full time students attended community college, there would be far fewer students in the short term, yet a core mission of our Master Plan would truly be lost.**

Page 43: states under Offer Courses that Align with Student Education Plans, “...California community colleges must strategically focus the scheduling of courses to meet the needs of students who are seeking degrees, certificates, and specific job training. These high priority needs are at the core of the CCC mission.” **CCA believes the three areas outlined by the Task Force are not the three that others agree should be the priority. CCA believes that the statement that has them at the core of the CCC mission is only part of the mission core.**

Page 44: states under Fund Courses that Support Student Educational Plans, “Courses that do not support programs of study and that solely serve as enrichment or recreational purpose should not be subsidized with state funds.” **CCA believes this contradicts statements made in page 38 of the Task Force recommendations. CCA also believes it is impossible to define an enrichment course and most recreational only courses. If one needs business speech to improve speaking skills enough to gain additional clients, would it still be enrichment? If a student carrying 18 units also wanted a course like walking, would it be considered recreational or life sustaining?**

Page 45: states regarding amending Title 5, “Explicitly allow colleges to enroll community service students without receiving credit 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 and consistent interpretation of the intent of such language. Certainly if this section is a reference to dual enrollment or two different tuition cadres for a single class, CCA would find either interpretation flawed.**

Page 45: 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 46: 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.**

Page 47: states under Professional Development is Key, “While many community colleges groups...have provide professional development to improve basic skills instruction and supports in the state, statewide coordination for what is now a completely-locally determined professional development activity is needed if systematic change is to be accomplished.” **CCA believes there are no guarantees that statewide coordination will be implemented because of the lack of enforcement mechanisms. CCA further asserts that locally determined professional development allows for specificity that will be lost by top down mandates.**

Page 48: states, “It is important to note that approximately 68 percent of entering CSU freshman requires remediation making it apparent that, as a state, we must provide education in new ways to ensure that students are college ready.” **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 48: states, “...the time and resources devoted to basic skills instruction need to be balanced with the other missions of the system, namely occupational training, college-level academic preparation, and transfer...This will involve further prioritizing of the apportionment streams and more directed uses of discretionary funds such as those provide for the Basic Skills Initiative.” **CCA believes once again the Task Force has chosen how the time, energy, and resources of community college funding should be spent. This unilateral decision is not necessarily accepted by all stakeholders. Certainly determination of how discretionary funds are spent is subject to collective bargaining.**

Page 49: 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 learning – 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 49: 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.**

Pages 49-50: 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 51: 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 would want to proceed past these classes? Who are the community-based partners?**

Page 51: states, “Identification of the appropriate credit and non-credit levels to be delivered by each education segment making sure to provide “safety nets” and an appropriate overlapping of services to provide all students with access to basic skills instruction.” **CCA believes that the lack of an enforcement mechanism renders this action plan unattainable. There is no current delineation of how many students fit any specific category of basic skills readiness under the Task Force recommendations.**

Page 53: states, “The end result envisioned by the Task Force will need to emerge through years of refinement.” **CCA believes this statement captures the essence of the Task Force recommendations. These recommendations should serve as a starting point for dialogue and discussion. Mere recommendations without funding, enforcement, and collaboration between management and labor will not become a reality until all parties are brought to the table and participate equally.**

Page 53: states, “On-going professional development is a fundamental component of supporting systemic change that will improve student success.” **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. CCA would like an accounting of how much professional development is actually occurring within the community colleges.**

Page 54: 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. CCA further believes that local control of this issue allows for the best assessment of what is needed at a particular college.**

Page 56: states, “Amend statute and Title 5 regulations to authorize the Chancellor’s Office and/or BOG to align the use of professional development with state objectives by encouraging colleges to link mandatory professional development activities to a set of statewide objectives and then measure movement towards those objectives.” **CCA believes 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. Encouragement has no enforcement mechanism.**

Page 56: states, “Amend Title 5 regulations to authorize the Chancellor’s Office and/or Board of Governors to recommend specific professional development purposes for flex day(s).” **CCA believes this charge is only a recommendation and has no enforcement component. Without enforcement and consequences, Districts have the ability to accept or reject a recommendation.**

Page 56: states, “Amend Title 5 regulations to ensure that professional development is equally focused on part-time faculty.” **CCA believes this recommendation would take additional funding or an increase in professional development funds which are within the collective bargaining components of a collective bargaining agreement.**

Page 59: states, “...the CCC Chancellor’s Office is a state agency under the control of the Governor...the Chancellor lacks the ability to appoint senior management staff such as vice chancellors... The authority of the CCC Chancellor’s Office is also impaired by state control over its regulatory power... the CCC must obtain the approval of the department of Finance before enacting regulations affecting the community college districts or changing how its resources are deployed to meet system needs...” **CCA believes these types of restrictions are part of the balance of powers and shared governance within the system that has at its the heart 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 and dilution of Prop 98 funds required to be spent on faculty and students.**

Page 59: states under the Role that Stronger Chancellor's Office Would Play, "To effectuate this recommendation, a stronger Chancellor's Office is needed to coordinate and oversee those efforts." **CCA believes this is the duty and responsibility of the Chancellor's Office at the current time. There is no need for regulatory changes to coordinate and oversee efforts and best practices.**

Page 59: states under the Role that Stronger Chancellor's Office Would Play, "A strong Chancellor's Office, oriented towards student success, would be empowered to help coordinate and incentivize regional approaches to delivering programs." **CCA believes that current policy allows for coordination of programs. CCA also believes that if the Chancellor's Office begins to incentivize regional approaches this would be a unilateral decision in how Proposition 98 funds would be spent. This would become a collective bargaining issue.**

Page 61: 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 would weaken education for students attending the California community colleges. CCA believes that any additional fee based funding establishes a dual fee structure that will adversely affect the most vulnerable students and those who can least afford college.**

Page 61: 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 62: 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 63: states, "...California Community Colleges will implement a new accountability tool that would present key student success metrics in a clear and concise manner. These scorecards will be posted at the state and local levels to help focus the attention of educational leaders and the public on student performance...the scorecards will be disaggregated by racial/ethnic group." **CCA believes the scorecard might be misinterpreted by both professional researchers and by the general public to the detriment of the District. Inaccurate conclusions might also be made concerning students at these institutions.**

Page 63: 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 64: 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 66: states, “Secure a commitment from the education segments for the development of a longitudinal K-20/wage data warehouse and the creation of an educational research resource.” **CCA believes there is no justification within the document that makes the K-12 and CSU and UC systems to participate. Lack of enforcement is problematic.**

Page 66: states, “(The) Chancellor’s Office, together with the other education segments and the labor agency should procure one-time funding (including grant and philanthropic funding) for database development.” **CCA believes this recommendation is a positive one seeking grant funds, the fact that philanthropic funding is discussed indicates by itself there will be strings associated with any funds.**

Page 67: states, “Both the redirection of existing resources and acquisition of new resources will be necessary to implement the recommendations contained in this report.” **CCA believes neither the redirection of existing resources nor the acquisition of new resources can be accomplished without support from all the stakeholders. It is clear that elements in the spending of unrestricted funds within the community colleges are subject to collective bargaining.**

Page 67: states, “...the Task Force took care to work within reasonable assumptions of available state funding... the Task Force crafted its recommendations to be viable within a reasonable range of financial costs.” **CCA believes that any redirection of existing unrestricted funds is subject to collective bargaining. CCA does not know what is meant by “recommendations to be viable within a reasonable range of financial costs” means. Further clarification of this statement is needed to foster a robust discussion.**

Page 68: states, “Despite efforts to contain costs, many aspects of these recommendations will require additional funding in order to implement them at scale and achieve significant positive impacts on student success.” **CCA believes this is a direct contradiction to the recommendation outlined on page 67 concerning working within reasonable assumptions of available state funding. Additional unrestricted funding cannot be unilaterally implemented without collective bargaining.**

Page 69: 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 requests for 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 fewer funds spent in this category for quite a while.**

Page 70: 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 70: states, “...the community college system should set as the first priority for additional state funding the investment in a new Student Support Initiative...The funds would be directed...to implementing diagnostic assessments, orientation, and education planning.” **CCA believes that stakeholders may not believe this to be the first priority for additional state funding. Once again, unrestricted funds need to be collectively bargained. This change in funding changes Proposition 98 funding divisions and therefore, must be bargained with the union representing the individual college.**

Page 72: states, “Allow a college, with the concurrence of its local academic senate, to seek the approval of the Chancellor’s Office to pilot innovative ways of delivering basic skills instruction that would be supported by regular FTES funding.” **CCA believes that each college has a right through the academic senate to discuss instruction, however at the point it transitions to the delivering of basic skills instruction it becomes a working condition and must be bargained.**

Page 73: states, “As part of its statutory charge, the Task Force studied outcomes-based funding as one of many potential strategies to promote improved student success.” **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 74: 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 it 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.**

CCA continues to have the following questions that were not addressed in the updated version of the SSTF released December 1, 2011.

1. How many of our students fall below or meet the poverty level?
2. How many of our students attend more than one college?
3. What are the high costs of assessment instruments for each of the colleges?
4. How many colleges have inefficient test administration?
5. What percentage of students enter community colleges with the electronic application CCCApply?
6. What percentage of the California community college students are self-directed and have the skills and resources to self direct?
7. How was the cost of \$12 million arrived at as the basis to centralize technology?
8. What percent of students within the California Community Colleges take one, two, or three courses?
9. How many California Community College students work full-time?
10. How many California Community College students enroll to upgrade their job skills?
11. How many students opt out of following suggested prerequisites or co-requisites?
12. How much "modest new funds" will be needed to gain the wants of the student outcomes program identified?
13. How much reallocation of funding would be necessary to gain the wants of the student outcomes program identified?