

November 15, 2011

Members of the Task Force:

I have been a member of the Governing Board of Trustees at Monterey Peninsula College for the past eight years. I was looking forward to reading the draft recommendations from the Student Success Task Force, as I too believe there is a crisis in California higher education. I appreciate the obvious effort that has gone into the document, and I found it to be very interesting reading.

However, after reading it, I now understand that we disagree on the nature of the crisis. To me, the crisis stems from the funding model and the cuts each segment of higher education has endured, including ours. There simply is not enough money in the unrestricted state coffers to fund higher education as we have known it. To the Task Force, the crisis consists of our apparent failure to graduate a sufficiently high proportion of our students.

The document contains several recommendations that have the potential of positively impacting our students. I disagree with many of the other recommendations in the report. Below, I will have comments about specific items in the document. Here, I start with four overarching concerns:

1. It is not clear that the need for the changes specified in the draft recommendations is as great as implied by the document. The document asserts that too many of our students are failing – dropping out – and that it is something about our system that is causing their failure. There are no data to support the assertions, and yet a casual reader would have no reason to doubt them. However, a careful reading of the document demonstrates that the authors count as successes (i.e., non-failures) only those students who earn an AA degree or a certificate. That is a distorted and limited view, which ignores many of our students.

Some of our other successful groups of students are: those who transfer without receiving an AA; those who are concurrently enrolled in four-year institutions; those who have not yet graduated high school; the recently defunded lifelong learners; those whose changing goals cause them to move to other community colleges; those who attend multiple community colleges concurrently, and others whose goals are satisfied without the need for achieving an AA degree or certificate.

If these other successful groups were merely ignored by the authors of the document, the picture would be false enough. In fact, what the authors do is even worse: They count each of the other groups as failures rather than successes on their own terms. This paints a very misleading picture of the success our students achieve. The document advocates fundamental changes to the community college model on the basis of a “need” that is much overstated.

2. Looking just at the target student population in the document (those dropping out before achieving their goals of receiving AA degrees or certificates), the document still ignores one of the two greatest causes of the failure of those students. It discusses a second major cause in detail, but it erroneously blames that cause on the system itself and fails to identify the optimal location from which to solve the problem. For this reason, the document seems less focused on solving the problem than it does on changing the system.

One of the largest reasons for student failure is financial need that precludes students from focusing on their collegiate education. Many of our students have to work, and many working students have to work full-time or even more. On this very real and significant problem, the document states only that the system should remind students of the benefit of attending college full-time, without the distraction of working. That is hardly a solution to the problem, yet a real answer to the financial need problem would have much more impact on student success than all of the recommendations in the document combined.

The second central problem that many of our students face is a lack of effective preparation in the K-12 system for college-level work. While a major focus of the document, this is specifically a failure of the K-12 system, not of the community college system. Why does identifying the source of the problem make a difference? Please recall that K-12 is funded at much higher levels on a per-student basis than is the community college system. In California, K-12 districts get somewhere around \$9,000 per student, whereas community colleges get somewhere around \$4,500. This is a K-12 problem, K-12 is the appropriate place to solve the problem, they have more money to solve it than we do, and yet we are being asked to fundamentally change our model to solve their problem despite the potentially deleterious effects the changes would have on us.

Please don't get me wrong: I understand that remedial education is in the purview of the community college system. In my mind, remedial education is one of the things we do, and if the need is greater, we have to do more of it. That doesn't mean we throw out the rest of what we do to accomplish the task.

3. The document summarily diminishes the historical mission of the California Community College System, turning the colleges back into "junior" colleges. The broadening of the mission of the system is a battle that was fought long ago. And the broadening was the right thing to do: Because different colleges in the system serve different populations, they have developed different yet still appropriate ways of satisfying their communities' needs. Abandoning the lifelong learning and economic development aspects of the system's mission with the stroke of a pen – with no discussion, and indeed no overt signal in the document that it is even occurring – is just plain wrong.
4. The document significantly diminishes local control of the colleges in the system. Control is a zero sum game. Any increase in control by the Chancellor's Office necessarily means a loss at the local level. As we struggle to cope with increasingly diminished resources (in my view, the real crisis), our colleges need more local control, not less. Frankly, the draft recommendations document adheres to a political rather than an educational agenda. It uses the excuse of an overstated problem to take both control and our already-diminished funding away from local colleges in favor of an increased state bureaucracy.

In short, these draft recommendations weaken the connection between community colleges and their communities, shrink local funding in favor of a monolithic statewide bureaucracy, diminish the autonomy of locally elected boards, inject politics into our educational system, and ignore the real problems that hinder student success: a dysfunctional K-12 system, financial challenges for our students who can not afford to attend college full-time, and the abandonment of higher education by policymakers in Sacramento.

Specific comments:

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

Collaboration with K-12 is essential.

However, the detail below the recommendation demonstrates that the particular form of this collaboration that is advocated is community college adherence to California's new K-12 Common Core State Standards. This is backwards. Just as it is appropriate for community college courses to adhere to the transfer expectations of UC and CSU, it is essential for those high school graduates matriculating to community colleges to adhere to those standards set by colleges. Colleges know better the appropriate preparation for work at the college level than does K-12. Although untested so far, the Common Core Standards attempt to establish minima for a meaningful high school education, appropriate for all high school graduates including those not continuing onto higher education. They are not proven to be useful for the purpose that the Task Force asks of them.

Recommendation 2.1: Develop and implement common centralized diagnostic assessments.

There is a clear benefit of standardizing placement tests across the system. However, what is not clear from this document is why a centralized structure would be required, nor why it would take \$5 million from our already-diminished apportionments to run.

Recommendation 2.2: Require students to participate in diagnostic assessment, orientation and the development of an educational plan.

Even in the diminished system envisioned by the Task Force, many incoming community college students will not be first-timers. First-timers will indeed benefit from diagnostic assessments, orientation and an educational plan, but others with prior collegiate experience will not. This recommendation to create a new unfunded requirement – that would be of dubious benefit to many community college students – would remove funding from other areas of greater benefit to many of our students. This is the first example of many in the document that forces a one-size-fits-all solution to a problem that is nuanced and differentiable at different colleges in the system.

Recommendation 2.3: Develop and use technology applications to better guide students in educational process.

I applaud the idea of integrated technology to help students. However, it is not necessary for the technology to be centralized at the Chancellor's Office to benefit students. In some areas – for example, BOG fee waiver forms – centralization makes great sense. In other areas, such as job placements,

attempts at centralization would be foolhardy. And in still others, such as transfer advice, centralization should probably come from the destination institutions.

Recommendation 2.4: Require students showing a lack of college readiness to participate in support resources.
Excellent.

Recommendation 2.5: Require students to declare a program of study early in their academic careers.

Not all students attend community college with the goal of attaining an AA or certificate. For those who have different goals, this recommendation is meaningless. For those students who want to attain an AA or certificate, encouraging the declaration of a program of study upon admission is probably innocuous. However, requiring the declaration by the end of the second term seems harsh. The loss of enrollment priority punishes those AA/Certificate students whose legitimate explorations caused them to revise their goals.

Many students in four-year colleges take longer than a year to declare a major. Why would you expect more of community college students than you do of students at four-year colleges? And if you agree that we should not expect more, why would you want to make it more difficult for them?

Recommendation 3.1: Adopt system-wide enrollment priorities reflecting core mission of community colleges.

I disagree strongly that the core mission of the community college system consists only of transfer, technical education and basic skills development. The abandonment of the remaining elements of the historical mission of the community colleges should come only after meaningful, in-depth analysis by stakeholders, if at all. While I understand that the temporary diminishment of some elements of our mission may be necessitated by fiscal realities of the moment, the abandoning of any element will make it that much more difficult to recover it in the future.

Abandonment typically means dismantling of a structure. When funding returns, the re-creation of that structure will assuredly take time and the overcoming of missteps, meaning that future students will be negatively impacted unnecessarily. The legacy of an abandonment strategy to a temporary problem is damage to a cohort of students who should not have been impacted.

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

It is unreasonable to expect AA/Certificate students to identify a career pathway in any meaningful manner at the outset of their college careers, yet section (A) appears to require entering frosh to declare a pathway before becoming eligible for a BOG fee waiver. In recommendation 2.5, the wording was "encourage" students to declare a program of study upon admission. Why tie BOG fee waivers for entering frosh to an unreasonable expectation?

Recommendation 3.3: Provide students the opportunity to consider attending full time.

This recommendation is meaningless, and a missed opportunity to advocate something useful for the large numbers of students who have difficulty completing their community college educations because of the need to support themselves.

Recommendation 3.4: Require students to begin addressing Basic Skills deficiencies in their first year.
Excellent.

Recommendation 4.1: Focus course offerings and schedules on needs of students.

Excellent recommendation. However, under requirements for implementation, several topics are broached that deviate strongly from the innocuous wording of the recommendation itself, diminishing both the mission of the community college system and local control of the colleges.

Bullet 1 states that apportionments may only be claimed if scheduled courses are part of educational plans. Even among AA/Certificate students, such a requirement limits students to what they have already planned to do. From this wording, it appears that community colleges would have an incentive to make it difficult for students to explore any area outside their already-declared plan. And bullet 4 makes it very expensive for the student as well. Exploration is a valuable aspect of higher education especially among AA/Certificate students; one that deserves support, not discouragement. And it is also the case that many of our students do not fall into the AA/Certificate category. Do the colleges not deserve apportionment for other legitimate categories of students?

Bullets 2 through 6 explicitly abandon several of those entire categories of students, including but not limited to lifelong learners, and bullet 7 severely weakens local control. Elsewhere in the document, lip service is paid to the goal of not forcing a one-size-fits-all strategy on community college education, yet starting in this section, the one-size-fits-all strategy becomes the centerpiece of the plan. One size definitely does not fit all. In my view, these “requirements” are dangerous to the mission, the system, the students and the colleges themselves.

Recommendation 5.1: Support the development of alternatives to traditional basic skills curriculum.

I support this recommendation, although it should be emphasized that mandating creative alternatives is a high-risk proposition. When creative alternatives were mandated in the No Child Left Behind program, the result was less than stellar: Most of the development money went to for-profit companies, and most of the students did not improve.

Recommendation 5.2: Develop a comprehensive strategy for addressing basic skill education in California.
Excellent.

A missed opportunity: This section stresses the importance of coordination between K-12 and community colleges. It also notes that 68% of entering CSU freshmen require remediation. It is silent about the proportion of entering UC frosh who also need remediation, but clearly the need for remediation extends well beyond community colleges. The Higher Education Master Plan delegates remediation exclusively to the community colleges, but it is obvious that UC and CSU have also been getting their version of apportionment by teaching remedial classes. Funding remediation in the community colleges would be easier if money currently spent at UC and CSU for remediation were sent instead to the community colleges, along with the expectation that those students needing remediation would also be sent there for those classes. This is a missed opportunity to promote coordination between not only K-12 and community colleges, but also with the four-year institutions in California’s Master Plan.

Recommendation 6.1: Create a continuum of mandatory professional development opportunities.

Recommendation 6.2: Direct professional development resources toward improving basic skills instruction and support services.

These recommendations hold merit, in my view. However, the requirements for implementation amount to another intrusion by the Chancellor’s Office. Community college faculties generally already know the benefit of professional development, and are aware of their own needs. What they lack is resources to accomplish the task. Professional development objectives are most likely idiosyncratic across the system, and best addressed at the local level. Protestations that the Chancellor’s Office needs to develop and enforce state objectives remain unconvincing.

Recommendation 7.1: Develop and support a strong community college system office.

It is not clear how increasing the bureaucracy at the state level and taking money away from local colleges to fund that bureaucracy will result in better education in the classroom. Recent experience in many areas of government, including the No Child Left Behind debacle, would argue that the opposite is true.

By the way, it is not clear that the systemwide coordination at UC or CSU is that much better than at community colleges. For example, the reason there is as yet no UC version of SB 1440 is that there is no agreement among the various UC campuses as to course equivalence – chemistry departments not even able to agree whether organic chemistry is a lower- or upper-division course. Thus, it is not necessarily the case that an increased bureaucracy at the Chancellor’s Office will result in increased coordination; the only thing that is certain is that it will result in decreased autonomy at the local level.

Recommendation 7.2: Set local student success goals consistent with statewide goals.

This is a reasonable recommendation. However, under the requirements for implementation, we learn about the “publicly understandable score card” as well as the goal of focusing on “which additional data elements are needed to support the goal setting function as well as which data elements can be retired to offset the new reporting requirements.” All that sounds innocuous, but what it does is reduce higher education, a very complex undertaking, into only a couple of numbers. Such an exercise can only lead to mischief.

Recommendation 7.3: Implement a student success score card.

Again I must remind the reader here that many of our students do not fit into the AA/Certificate mold. This is important, because the “score card” would focus on outcomes that are relevant only to people who

do fit into that mold. For example, a woman gaining career advancement because she passed two accounting classes would look like a failure on the score card. As posited, the score card is a flawed tool which will be likely to cause laypersons to jump to unwarranted conclusions in the context of how many of their tax dollars are going to fund community college slackers. If that sounds like a political agenda as opposed to an educational one, I believe it is too.

In general, the result of the kinds of actions advocated in the draft recommendations regarding standards has historically been to take educational decision-making out of the hands of educators and place it in the hands of politicians. I know of no instance where that kind of change has resulted in improvements to education.

Recommendation 7.4: Develop and support a longitudinal student record system.

Excellent.

Recommendation 8.1: Consolidate select categorical programs.

Excellent.

Recommendation 8.2: Invest in the new Student Support Initiative.

A seemingly innocuous recommendation followed by inappropriate prioritization and draconian requirements.

Bullet 1: We are severely underfunded at the classroom level. There is no doubt that student support is critical to student success, and the existing categorical programs that would make up the Student Support Initiative are also underfunded. However, a mandate that new money would go first to this Initiative means that it would not go to the classroom. Classroom-based needs are even more critical at this juncture than are the programs in the Student Support Initiative.

Bullets 3 and 4: The carrot-and-stick approach (we won't give you what you need unless you do what we want) is demeaning, forces outcome-based funding and clearly demonstrates the attempt to politicize the community college system.

Recommendation 8.3: Promote flexibility and innovation in basic skills through alternative funding mechanism.

Recommendation 8.4: Do not implement outcome-based funding at this time.

The disagreement between Task Force members as to whether or not outcome-based funding is appropriate for the community college system is obviously at the conceptual level. (Although I am only guessing here, I would bet that the educators on the committee argued strongly against the idea, while the politicians and their consultants argued strongly for it.) Recommendation 8.4 states that we should not implement outcome-based funding, but recommendation 8.3 gets us there anyway. Earlier recommendations in chapter 7 mandate the collection and dissemination to the public of outcome-based measures. Recommendation 8.2 withholds money unless we obey. The obvious goal here is to force the hand of the system so that there is no alternative but to accept the outcome-based approach – and this is despite the fact that there is both no evidence that such a change would improve education and ample evidence that it would not.

Conclusion:

Overall, I am disappointed that the Task Force chose to focus on lack of preparation as the fundamental problem faced by today's community college students. That is a real problem felt by many of our students. However, much of that problem can and should be addressed at the K-12 level. And if it is successfully addressed there, there will be less need for the singular focus on K-12 failure that is contemplated by the draft recommendations. Yes, we should be picking up the pieces, which is something we have done and will continue to do. But I don't believe we should be fundamentally altering the structure of the community college system and eliminating large portions of our historical charge to take over K-12's failures.

I know that the draft recommendations are heart-felt by many of the members of the Task Force. And I do believe that a number of recommendations in the document hold great potential for those students who need remediation, particularly:

- 2.4 – Require students showing a lack of college readiness to participate in support resources;
- 3.4 – Require students to begin addressing Basic Skills deficiencies in their first year;
- 5.2 – Develop a comprehensive strategy for addressing basic skill education in California;
- 7.4 – Develop and support a longitudinal student record system;
- 8.1 – Consolidate select categorical programs.

However, for reasons presented above, I also think that many others point the wrong direction, especially:

- 3.1 – Adopt system-wide enrollment priorities reflecting core mission of community colleges;
- 3.2 – Require students receiving Board of Governors fee waivers to meet various conditions and requirements;
- 7.1 – Develop and support a strong community college system office;
- 7.2 – Set local student success goals consistent with statewide goals;
- 7.3 – Implement a student success score card;
- 8.3 – Promote flexibility and innovation in basic skills through alternative funding mechanism.

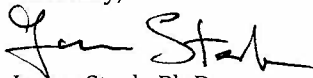
Furthermore, many of the remaining recommendations seem reasonable on their face, but the detail following them is hardly warranted by the recommendations themselves, turning good ideas into terrible solutions.

What the Task Force chose to *not* look at is also disappointing. Several topics that could strongly impact our students have hardly been addressed in the draft recommendations. For example, much more effort needs to be devoted to the financial need issue. A real solution in this area would have significant and meaningful impact on our students, much greater impact than the topics chosen by the Task Force to examine. Furthermore, the true crisis in California higher education – the lack of funding – is accepted in the document as inevitable and unalterable, and apparently not worthy of any concentration at all.

As a result, it appears that the Task Force has been focused more on changing the system -- strengthening the Chancellor's Office, changing the funding mechanism, eliminating the lifelong learning and economic development facets of our charge -- than it has been on solving the problems our students experience. And finally, a word about timing: Colleges are deliberative and slow-moving bodies. That can be frustrating to anyone from the outside trying to effect changes, but the shared governance structure has been proven to work well across generations. In the world of higher education, speed is typically sacrificed for a higher probability of success in outcomes. The six-week window for commentary about the draft recommendations is ridiculously short, and again demonstrates the political nature of this process. Changes of such major consequence to the colleges, their governance and the funding model deserve longer examination from the affected constituencies.

Thank you for your time and efforts. I also want to thank you for reading this document through to the end. I hope it is accepted in the spirit in which it was written, coming from one who also cares about community colleges but who sees great danger where the Task Force apparently sees only opportunity. If I can be of further assistance to the Task Force, I would be happy to oblige.

Sincerely,



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