February 1, 2018

Honorable Holly Mitchell, Chair
Senate Budget Committee
State Capitol Room 5019
Sacramento, CA 95814

Re: Community College Budget Proposal

Dear Senator Mitchell:

Thank you for your leadership and continued support of California's community colleges. We appreciate the long-standing attention you have given to our students and to our institutions, particularly the consideration paid to our underserved populations and your commitment to the financial support necessary to improve student success and assist students in reaching their educational goals.

As the Academic Senate for California Community Colleges, which represents 58,000 community college faculty on all academic and professional matters, we are obligated to serve as guardians of academic standards and instructional integrity as outlined in statute and regulation. In that capacity, we wish to express our genuine concern with two parts of the Governor's budget proposal: the fully online community college and the new funding formula.

The online community college proposal includes $120 million from Proposition 98 dollars ($100 million one time, $20 million ongoing). The Academic Senate fully supports the goal of expanding access to working adults, particularly those individuals not currently well-served by the state's higher education offerings, and we are committed to serving all student populations in California by exploring the feasibility of developing non-traditional online programs. However, the Academic Senate does not believe that the establishment of a separate, fully online college is a viable paradigm. Our primary concerns include the following:

- **Our current college system can make a more significant impact on all students in California with an integrated approach.** This item in the budget is a major investment that purports to spur innovation in the community colleges by heavily resourcing a single entity, the fully online college. In practice, this shift of resources would isolate innovation in our system rather than encourage and support it. By establishing a fully online college, the California Community Colleges Chancellor's Office will be forced to concentrate its investment into new infrastructure, processes, and personnel. If these dollars were instead directed to fund innovation and expansion of online offerings in the existing community college infrastructure, the system could leverage the talent and expertise of the 58,000 faculty currently employed in our community colleges, many of whom teach online successfully and many of whom support the partnerships inherent in the new Online Education Initiative. Our system, on which more than two million students rely, will better achieve broad-scale, substantive outcomes with an integrated, multi-college approach rather than with an isolated solitary entity.
The proposed fully online community college represents a risky initial and on-going investment in a new enterprise that expands the scope of the work of the Chancellor’s Office such that the Chancellor’s Office as our regulatory agency would be in competition with the colleges. To be viable, the online college would necessarily have to engage in extensive marketing to recruit its intended population. In doing so, it has the potential to draw students away from our colleges. We are not convinced that the new model avoids competition for enrollment with our currently accredited colleges.

There is no data to support the presumption that the target population desires this kind of educational opportunity, nor is it clear that adequate access to the online environment needed to succeed in college-level courses is readily accessible to these students. While studies indicate a high rate of Internet access through cell phones in the targeted population of 25-34 year olds, we are skeptical that a cell phone is a sufficient mechanism to facilitate online learning. Although online instruction is a good option for some students, many students are better served by more traditional forms of education, especially those from our most vulnerable populations.

As proposed, the fully online college will not be integrated into our existing system, which will serve to isolate its students from our existing educational opportunities. If the student needs identified in the proposal were met by expanding online opportunities and delivery mechanisms across the system, on-ramps to existing certificates, degrees, and transfer opportunities could be established. Based on current descriptions, we are skeptical that articulation agreements between the new entity and our currently accredited colleges could be reached. Furthermore, online students in our existing programs have ready access to the on-ground support structures already present at our colleges, many required by the strict standards accreditation applies to online learning. Shifting funds to a new entity necessarily detracts from supporting our existing colleges and is a missed opportunity to invest in ensuring that all 114 colleges can address the needs of the proposed target population, many of whom we already serve in classes held at non-traditional times or, in some programs, online.

The Academic Senate believes that the needs of students are better served by building on the system’s existing structures. Faculty, colleges, and the system have invested significant time and resources in the creation and expansion of the Online Education Initiative (OEI). At the direction of the Legislature and the Chancellor’s Office, OEI has focused primarily on providing online instruction and services for students transferring to universities. In the past five years, OEI has developed an entire online educational system, which includes the processes necessary to ensure academic quality and rigor, the appropriate student supports and accessibility compliance, and a framework designed for students to readily access curricular offerings from colleges within the OEI consortium. Success rates for courses that meet the established standards set by OEI have closed the gap between online and face-to-face delivery method while the success rates online students not enrolled in OEI courses continue to lag behind. These are significant advancements in online education outcomes. As the OEI nears the end of its initial phase, it is poised to expand by increasing the number of colleges in the consortium, offering additional educational opportunities, reaching and serving more students, and extending beyond its original charge of serving transfer students.
It is clearly possible to expand the OEI to include noncredit and career education and add additional areas of transfer. It is also possible to schedule continuous and varied educational offerings throughout the year, online or on-ground, particularly if fiscal disincentives at the state level are removed. Increasing educational opportunities and options through the OEI allows our colleges to not only better serve our existing students but also serve new student populations, including the student population targeted by the proposed online college. Additional investments in existing efforts, with an emphasis on specific types of instruction using online modalities and competency based course design, would be a more cost-efficient and risk-minimizing approach. Further, if the intent of the proposed online college is to create an opportunity to rival those services provided by existing for-profits (in instances where the proprietary schools are serving, and not disserving, California students) investments in outreach and recruitment must be made to serve all students.

Leveraging existing resources and structures to help all colleges increase educational offerings, including competencies and self-paced learning opportunities, meet the standards for accessibility and course design requirements, and provide ongoing faculty professional development would enable an integrated, systemic online presence. An investment here, instead of in a separate entity, will improve the effectiveness of all colleges in the system to better meet the needs of California’s current and future workers. We would appreciate the opportunity to discuss this further with you and are happy to serve as a resource to gather any data or information that might help you. The Academic Senate is excited to work with you to meet the goals of this project through existing infrastructure.

The Academic Senate also wishes to express significant concern regarding the new funding formula proposed in the Governor’s January budget. We appreciate the desire to focus on student success and improve outcomes for all students and we acknowledge that any funding formula, including the current one, may incentivize certain institutional behaviors or disincentivize others. Our primary concerns include the following:

- **Performance based funding as a mechanism for distribution of base funding incentivizes behavior counter to our core beliefs of access and opportunity for all students and our obligation to maintain appropriate rigor to ensure future success. By basing any portion of base funding on student performance, colleges may apply pressure to faculty, particularly part time faculty who do not have the protection of tenure, to inflate grades to try to secure funding. Colleges may funnel students toward a reportable completion metric whether it is personally and professionally authentic for the student or not. Presently, the colleges are working towards implementing measures to increase the rate at which students achieve college-ready status due to recent assessment and placement legislation as well as implement a guided pathways framework. Adding the pressure of incentive based funding will exacerbate the apprehension felt by faculty and other college personnel who are already tasked with these significant reform efforts.**

- **Access and opportunity may be reduced for those students who need our colleges the most.** The Academic Senate believes that everyone deserves the opportunity to access higher education. A funding model that includes measuring student completion will encourage some colleges to establish practices and polices that preference students based on their perceived potential for success; this could include altering scheduling mechanisms, local policies for enrollment and probation, or practices for recruitment. These actions are antithetical to the core principles of ensuring open-access and lifelong educational opportunities for all Californians, especially those who may need a second chance at a better life.
The Academic Senate believes our funding model can be improved while still providing access and opportunity for all our students. We would welcome the opportunity to further discuss this and are happy to provide additional information upon request.

The Academic Senate appreciates the Governor's and the Legislature's attention to the California Community Colleges and we share the goal of meeting the diverse educational needs of California's student populations. We express our concerns with these items in the budget proposal from a place of obligation to fulfill our role defined in statute as the voice of faculty in academic and professional matters, and we only wish to ensure the academic integrity of our educational programs and institutions while serving students to the best of our ability. We appreciate your consideration of our positions and your continued support of community colleges and our students. Please do not hesitate to contact us about these or any other academic and professional matters.

Sincerely,

Julie Bruno
President
Academic Senate for California Community Colleges

cc:
Hon. Kevin McCarty, Assembly Budget Subcommittee No. 2 Chair
Hon. Jay Obernolte, Vice Chair of Assembly Budget
Assembly Budget Subcommittee No. 2 on Education Finance
Lark Park, Office of Governor Brown
Monica Henestroza, Office of Speaker Rendon
Edgar Cabral LAO CCC Analyst
Chris Ferguson, Department of Finance
Cecelia Estolano, Board of Governors
Eloy Ortiz-Oakley, Chancellor
Christian Osmena, Vice Chancellor, California Community Colleges
Lizette Navarette, Community College League of California
Jonathan Lightman, Executive Director, Faculty Association for California Community Colleges
Courtney Cooper, President, Student Senate for California Community Colleges