



**COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION
NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES**

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TO: Jane Gates

FROM: Barbara Brittingham DATE: 1.28.2018

RE: Comments on the 1.18.2018 draft, version 2.3, substantive change

Jane, thank you for sending the draft of the CSCU substantive change proposal. Pat and I have had a chance to go through it, and I'm writing with some feedback. The comments are organized into two parts: some general comments and then some more specific comments. I've numbered each set in the hopes that the comments will be easier for you to discuss with others. I hope you find the comments useful, and of course, we are available to talk further if that would be helpful.

We will need the final version no later than March 16, 2018. That date can be for the electronic version (a single, searchable pdf); you can put the four paper copies in the mail that day.

General comments

1. As we discussed when we were recently at your offices, the question before the Commission will be: Will the proposed institution meet the Commission's *Standards for Accreditation* and its policies?

Recently, the Commission has expressed two over-arching concerns about the current collection of 12 community colleges: 1) low graduation rates (9 of the 12 institutions had graduation rates for first-time/full-time students below 15% in the 2017 reviews; certainly this rate is highly imperfect, but the percent of community colleges that were below 15% is significantly higher than in other New England states with multiple community colleges); and 2) finances, with the Commission expressing concern for 10 of 12 community colleges in their most recent comprehensive evaluation or interim report. With a proposal to remove \$28 million from the collective budgets, the Commission will need to know, among other things, that students will be at least as well served as now and that there are appropriate resources available to support the programs and services being offered. Please include more evidence about the claims made, especially about the need for fewer staff once the consolidation is accomplished.

The draft does not yet accomplish these goals. We cannot tell in any useful detail what is being removed from each institution in the way of positions, services, contracts, or other expenses. We understand that some (much?) of the reduction in personnel expenses will come through attrition, but we cannot tell what the contingencies are for replacing key personnel who leave during the next several years.

The proposal needs to strike the right balance between describing what is and discussing what will be, with a heavier emphasis on the latter. An appreciation for what is in place will be helpful to the Commission but clarity is needed throughout about what will be different when the new College has been established and how those different structures/ processes/ policies will be compliant with the Standards.

2. Please include information on who will be doing what, the timeframe, and expected outcomes. For example, several committees are mentioned. It would be helpful to have a single listing (perhaps as an appendix referenced in *Planning and Evaluation*) of the committees, the charge to each committee, the membership (names, titles, institutional affiliation), the meeting dates so far and forthcoming meetings scheduled, and the 'due date' for the work of each group. This will give the Commission a good sense of how broad-based the planning is and how realistic it is that the work can be accomplished in the proposed timeline.
3. Please include examples of work that has already been accomplished or is substantially underway. The Commission's confidence that what has been proposed can be accomplished as described can be strengthened by evidence of success to date.
4. Please include a multi-year budget, incomes and expenses, that reflects each of the campuses, the expenses of the central community college office, and expenses associated with the regional offices. This should be in the section on *Institutional Resources*, along with the discussion of the human and financial resources.
5. The proposal would seem to suggest that many people now located at the various campuses would be reassigned to work in Hartford. Is this correct?
6. If you have information on the staffing of other comparably-sized institutions, especially community colleges, you might want to include a comparison chart or two to show that what you are proposing is in line with other similar institutions.
7. The comments reflect our understanding that this is indeed a draft, and that you'll have an editorial process to, among other things, reduce the repetition in the report. For example, the rationale for the change can be stated at the beginning and need not be repeated throughout the report.

Specific comments

1. The proposal is about administrative consolidation as well as the consolidation of the community colleges. Please make sure that's clear to the reader.
2. Any executive summary should be no more than three pages, please. And while some introduction about the problem – and any alternatives considered – would be useful, you don't want to take too long to get to the Standards. What is now in the introduction includes material about the Standards, so that information, if not redundant with what's already in the Standards section, could be moved.

3. The description of the problems leading to this proposal can be in the introduction.
4. Please include the cost and timeline to implement new features identified. One example is the data warehouse. Show the offset of new costs to projected savings.
5. Be careful not to unintentionally mischaracterize the words or positions of the Commission. E.g., page 12 says that the CIHE's letters have "identified the need for reform in the community colleges" and page 32 notes that institutions have struggled to meet "NEASC recommended thresholds" for the use of part-time faculty. The Commission does not have any "recommended thresholds" for part-time faculty.
6. Can you please provide an indication of the size of the teams and groups listed on pages 22 and 23. You may want to say a bit more about how IR will serve the campuses. In the recent study on low graduation rates, the Commission observed the usefulness of campus-based IR to formulate and address questions about student progression.
7. Page 26 makes the claim that one financial aid system will "support more students, increase enrollment, and therefore increase tuition and fee revenue." Please include evidence to support the claim.
8. Page 28 says that functions that are currently maintained by each campus could be automated." Will they be? Do you have cost and time estimates?
9. Page 28 claims that the community college would save approximately \$400,000 through consolidated purchasing, but there is no basis given for that calculation, which we realize is an estimate.
10. Page 29 says that "all College human resources personnel will have direct accountability to the System Office." Please clarify the accountability of HR personnel to the CEO of the proposed College.
11. Page 31 says that "a consolidated structure is well-suited to address the opportunity/achievement gap that exists throughout the state." If this is a claim being made for the consolidation, please include some evidence.
12. Page 32 has a section on integrating information technology. Please include a timeline and cost estimates.
13. Page 33 discusses replacing department chairs and program coordinators with associate deans. Please include the current and anticipated FTE to perform the duties of "supervision and professional development of adjuncts, class scheduling, program development and assessment, etc." Please also indicate how the associate deans will be able to perform these functions across a wide range of disciplinary areas.
14. Relatedly, either here or in the section on internal governance, please indicate whether there will be, for example, a Dean of Nursing or a Dean of Health Programs to serve the

several campuses in large programs or broad areas of study. With the proposed centralization and the proposed elimination of department chairs and program coordinators, it is not clear how the programs will be coordinated and overseen at the institutional level.

15. Page 33 also references specialized accreditation. It would be helpful to include the progress-to-date on working with each of the specialized accreditors to see what is involved along what timeline in switching from accreditations at multiple community colleges to, presumably, one accreditation per program for the envisioned institution.
16. Page 34 discusses the proposed organizational structure. More detail would be helpful here about the role of the regional Presidents vis a vis the campus vice presidents.
17. Page 34 under Implementation Process and Timeline, it would be helpful to include the one-page timeline that is found later in the references.
18. It is our understanding that as of the time we visited the System Office, the Students First Academic Affairs Consolidation Committee had not yet been scheduled to meet. Given the broad charge of this committee, it might be helpful to provide some indication they can complete their work in a way that satisfies the overall timeline.
19. Page 35 outlines the planned schedule for determining from what institution students will graduate and when ~~new curriculum requirements~~ will be phased in. Given that the typical time-to-degree for community college students is about 5.5 years, please estimate and include the cost of courses to meet two sets of degree requirements for 3-4 years.
20. Page 36 notes that the ~~new~~ mission statement will be included in the report to the Commission in March 2018. Please include an explanation of how the new mission statement is providing direction to the other matters in the plan.
21. Page 42, *Organization and Governance*. Our suggestion here is to include less on what is in place now and more on what will be the case.
22. Page 49 says that the 12 colleges currently offer 760 academic certificate and degree programs. Is there a general goal of how many programs a consolidated institution would offer?
23. General Education. Page 50 notes that it will likely be 21 (or 24) or 30 credits. Elsewhere the report says that General Education is 20 credits.
24. Also page 50 talks about a “competency-based General Education component.” In accreditation lingo, “competency-based” is a term of art, and you might wish to avoid using it here.
25. What is the process and timeline for the revised General Education program?

26. Page 51 discusses the common course numbering system. How, if at all, will that change in a consolidated institution?
27. Page 53 says, “Initially dual enrollment programs will remain independent until a structure is devised to bring them under the jurisdiction of the College.” Please note that these credits are as important as any other credits that the college(s) award, and the Commission will likely be looking for clear assignment of responsibility and a way to ensure quality of dual enrollment programs. Quality of dual enrollment courses has been a concern of the Commission, and that concern may well increase.
28. Page 53 includes a section on “Coherent Program Design.” It would be helpful to include more on who is responsible, what the timeline is, and what has been currently accomplished. An example or two might be helpful here.
29. Page 53. The timeline for curricular change seems aggressive. Will faculty be working over the summer on this matter or others, and if so, is there a cost associated with the work?
30. Page 56 says that students will be given two years to complete any discontinued programs. Is that realistic, given the enrollment patterns of community college students in Connecticut?
31. It’s generally good to avoid “self-advice” in the proposal – e.g., the section on Standards of Student Achievement on page 57 talks about what “must be” accomplished and “should” be done rather than what “will be accomplished” and “will” be done.
32. Page 58 references a “standardization of placement scores, pre-requisite requirements, student learning outcomes, and program-specific outcomes. Who will be responsible, how will they go about the work, and what is the timeline?
33. Page 59 references Phase Two planning. Please explain.
34. Page 60 includes a chart, but it is not clear what happens with students who begin in F2019 or S2020.
35. Page 62. Please discuss the number of student services professional and support staff that will support 52,000 students, indicating any changes, by campus, that are in the plan.
36. Page 63. The draft notes the challenges currently staffing libraries and having them open enough to serve students. Does the plan include any re-investment in library staff?
37. Page 65. Please discuss the number of academic affairs professional and support staff that will support 52,000 students, indicating any changes, by campus, that are in the plan.
38. Pages 65 and 66. Does the plan include any changes in the number of full-time and/or adjunct faculty?

39. Page 67. Please expand on the paragraph on Human Resources. The plan envisions a significant reduction in personnel. This would be a good place to provide sufficient detail about what personnel is being reduced – overall and as a percent of each college and by division – or comparable metrics that can provide a basis for Commission understanding. The detail should be included in this section – in Human Resources and/or Financial Resources. Page 69 has words about the calculations. The Commission will want to see numbers and more details so it can understand the impact of the reductions and have a basis to decide whether what will remain will be a sufficiently staffed institution to meet Commission standards. One way to do this is to provide detail to Appendix G. Detail of the table on page 71 would also be helpful.
40. Re: positions and functions that will not be affected by the change – the Commission will want to see a definitive list rather than simply examples (e.g., page 68 says “such as advising and counseling”). It will also be important to include the definitive list of positions that will be eliminated or consolidated.
41. Page 69. Please include numbers and details in the “Calculations” section.
42. Relatedly, page 71 says that “The proposal substitutes Associated Deans for current, multiple levels of administration. We believe that the estimate of \$1.5M is conservative.” Page 72 references “Elimination of Division Directors and Department Chairs.” Please provide additional details, with budget numbers and the impact on each campus.
43. Page 71 discusses the “normal rate of attrition.” Please say more. Also, attrition doesn’t always happen where we want it to. Please include a discussion of contingencies and how they will be handled.
44. Page 72. Please provide detail behind the numbers in the chart.
45. Page 73. We note that the data for the community colleges are not yet available through SAM; if you have those data, you might wish to include the displays.
46. Page 74 indicates there will be fewer positions in IR functions. Please include details and indicate how the college – and the campuses – will have sufficient capacity in this area.
47. Page 81. It is not clear that the schedule for the new website, ct.edu, will provide sufficient information in a timely way, given the significant changes that are planned quickly. Can you please include a timeline and estimated cost for the change. The proposal notes that campus websites will be maintained locally and the Academic Affairs office will draft and print all academic publications. It’s not clear from the information in the draft that these functions are staffed.
48. Specialized accreditation. Can you please include a plan – schedule and who’s responsible and your preliminary findings – to ensure that the plan will not disrupt any specialized accreditations, or if it will, how you plan to deal with that.

49. You can kindly omit Appendix V, the long list of courses. Thank you. You might want a page or two as a sample.
50. Please include the map that shows the campuses and the regions in the body of the report – perhaps early in the overview.
51. Fringe benefits are listed as at 75% of salary. That seems unusually high; it would be useful, please, to include a summary.

Jane, again thank you for sending a draft and giving us the chance to review it. Our comments are meant to be helpful. Also, our comments are meant to be general and illustrative, rather than complete in every instance. We recognize this is a work-in-progress.

Please stay in touch and let us know if we can be helpful going forward.

cc: Mark Ojakian