

Phillips, Jeanie

From: Mary Anne Cox <maryannebarrycox@gmail.com>
Sent: Thursday, January 25, 2018 12:14 PM
To: Phillips, Jeanie
Subject: Submission of Testimony/materials for Higher Education hearing January 29, 2018
Attachments: Cover for Higher Education hearing.docx; Public Comment for NEASC final - corrected.docx; Questions on Standards and Consolidation.docx

The attached documents have been sent to the Commission on Institutions of Higher Education of the New England Association of Schools and Colleges as part of the “public comment” process to oppose the plan by the Connecticut Board of Regents for Higher Education to consolidate Connecticut’s Community to form a “single college” unitary model for community college education. We believe this model to be antithetical to the mission of community colleges. In addition, the proposed consolidation ignores the demands of many of NEASC’s standards for institutional accreditation and neglects to address the educational needs of the students and communities that community colleges currently serve.

We ask that these documents, and the attachments listed on page 5, which will follow by mail, be included as testimony at the Higher Education and Employment Advancement hearing to take place on January 29, 2018.

Thank you, Mary Anne Cox for the CT Community College Roundtable

1/25/2018

To: Co-Chairs, Higher Education and Employment Advancement Committee

Senator Beth Bye

Senator Arthur Linares

Representative Gregory Haddad

From: Mary Anne B. Cox, for the Connecticut Community College Round Table

Subj: Board of Regents' Proposal to Consolidate Connecticut's Community Colleges

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Respectfully submitted.

Dec. 31, 2017

Dr. Barbara Brittingham

Commission on Institutions of Higher Education

New England Association of New England Schools and Colleges

3 Burlington Woods, Suite 100, Burlington, MA 01803-4513

Dear Dr. Brittingham,

The following is a summary of public comments made by various advocacy groups and individuals in opposition to the consolidation of Community Colleges in Connecticut as approved by the CT Board of Regents in December 2017. The Connecticut Community College Round Table, a group of retired college/system leaders and current advocates, requests that this summary be made part of the public record as the Commission on Institutions of Higher Education considers the substantive changes and accreditation for the proposed unitary model for a single Community College of Connecticut replacing the system of twelve individually accredited regional institutions.

The Loss of Student Services and Community Educational Resources

The advisory letter of August 11, 2017, from the Commission on Institutions of Higher Education to President Ojakian of the Connecticut State Colleges and Universities in reaction to the emerging reorganization scheme asked directly: *“How ... can a total reduction of \$41 million ... be accomplished without undermining the quality of academic programs and services?”* CIHE further questioned if *“the anticipated savings will be sufficient to do anything other than eliminate the deficit and, consequently, ... how the proposed merger will result in an improved educational experience for students”* in order to be consistent with accreditation standards.

This penetrating question has never been adequately addressed. According to NEASC Accreditation Standard 5, college services must be “appropriate to the college’s mission and the needs of its students.” The institution “must provide accessible and effective services designed to provide opportunities for student to be successful in achieving their goals.” Community College advocates question how this will be accomplished in a “centrally managed college” while still realizing the savings and reductions required by consolidation, centralization, or regionalization of operations.

We estimate the college’s budgets have been reduced by approximately 20% or more since the creation of the Board of Regents in 2012, or approximately 4-6% per year through reductions or rescissions. Reserves have been exhausted, positions have been held vacant in order to achieve required reductions, tuition has been increased, state-funded financial aid has been reduced, and enrollments have declined further reducing revenues. How can additional reductions of the proposed magnitude, \$41 million or more, possibly ensure a quality educational experience for students or reassure the public through

accreditation that Connecticut's public colleges are fulfilling their mission to educate the state's students to compete in the 21st century?

This is particularly troubling given that Connecticut suffers the greatest achievement gap in the nation between its minority students and their white peers and that the community colleges, the institutions most devastatingly affected by the proposed consolidation and resulting resource reductions, serve over two-thirds of the state's minority undergraduates in public higher education.

The consolidation plan and financial model approved by the Board of Regents on December 14, 2017, does not provide any convincing answer to these questions. The plan lacks any comparative information for the current distributed model with the proposed consolidated model. The BOR plan is a scenario of financial reductions; over 190 positions are eliminated in the proposed model, with no analysis of impact on service delivery resulting from transitioning to a centralized model. Details on how student services will be delivered and overseen is entirely absent in the proposed model. This significant flaw led former State of Connecticut Comptroller William Curry to comment in the Connecticut Mirror of 12/14/17, "based on the cards the board has been shown, no responsible fiscal officer would certify them ... So substantial are the omissions one must consider the real possibility that the plan will cost rather than save money." Mr. Curry points out many disadvantages of the consolidation plan and the repeated failures of the Board of Regents to fulfill their oversight responsibilities. (His letter is attached here for consideration in the NEASC review process.)

Faculty organizations, academic leaders, regional advisory councils, and college Foundations, national educational leaders and policy analysts have all expressed concerns about the Board of Regents' consolidation plans. An article of November 7, 2017 in Inside Higher Education on State Mergers of Community Colleges cites the concerns of two well-known education policy analysts related to the challenges of institutional mergers: "the impact for the merger on local connections and economic development," is of concern for Iris Palmer, New America education policy program, and the mission-driven goal to "strengthen services while seeking efficiencies" is cited as the primary interest for Aims McGinnis of National Center for Higher Education Management Systems. McGinnis also stresses the importance of "having an administration that really understands the region."

Students First, the Board of Regents plan, fails to address either of these concerns adequately and is a disservice to the state's most disadvantaged students, those who rely on affordable, accessible, high quality education offered by community colleges to achieve academic success, career opportunities, and an improved quality of life for themselves, their families, and their communities.

The potential loss for students is the issue that unites disparate groups in opposition to the consolidation scheme being proposed by the Board of Regents. Budget reductions, portrayed as the only option to sustain operations, suggest a vision for a highly centralized system distant from the students served. The current plan would diminish local leadership and reduce local service delivery, inevitably weakening student success, community relationships, economic development, and fund raising.

The Middlesex Community College Foundation, Middletown, Connecticut, has repeatedly questioned the Board of Regents' proposals as they began to emerge in the summer of 2017. The Foundation Board wrote to reassure donors by committing to continued advocacy for "the educational programs and essential support services that meet the ... needs of the local region and its students in order to ensure that our students and our communities thrive." Similar questions were raised by community college Foundations throughout the state. Their questions to Mr. Ojakian resulted in a series of FAQs distributed to college Foundations, which in the words of a past Foundation Chair, "raised more questions than they answered," especially about the loss of community connections and the impact on fund raising by Foundation. (Questions attached.)

Presented in a series of charts with no clear information on comparative costs for new levels of bureaucracy, with support staff at the system level, and no clear responsibility for service delivery to students and communities currently served at the campus level by the 12 regional community colleges, the Students First plan has met objection from faculty leaders and organizations as well.

System leaders and Foundation members, both current and retired, have questioned Mr. Ojakian's claims of savings as presented to the Board that appear to show college presidents being replaced by new leadership positions and additional staff positions at the system level while college leadership and staffing is decimated. "The heart of the community college is its relationship to its community not to the government bureaucracy headquartered in Hartford. The centralized bureaucracy necessary to manage and administer a twelve campus system will ultimately not produce the savings reported and will certainly not be responsive to local and regional educational and training needs." Robert Miller, President Emeritus and Founding President, Quinebaug Valley Community College, longtime member QVCC Foundation, AACC, NEBHE and NEASC/CIHE. "A single statewide curriculum may sound efficient, but it will actually stifle creativity and innovation and keep Connecticut behind in developing and implementing cutting edge, relevant programs to meet the educational needs for tomorrow's students."

Similar reservations about the loss of student-centered, college-based services, and faculty-led program oversight in favor of a centralized, top-down decision-making model has been expressed by the Delegate Assembly of the Congress of Connecticut Community Colleges who recently voted to oppose the Students First consolidation plan voicing "concerns centered around the fact that while the plan may be named "Students First" in reality it does not appear to put students first. The plan seems to add layers of bureaucracy, potentially moves services further from students, limits local faculty curriculum oversight, and contains components of failed 'no student left behind' concepts." 4Cs' statement, November 2017

A more recent statement from a systemwide governance group expressed concerns about the "faculty's lack of engagement in decision making, governance, and curriculum development; the loss of community connections and funding support, institutional identities and accreditation; and the failure to invest adequately in student success, achievement, and development." Loss of individual college accreditation is a grave concern for academic leaders such as the governance organization of Norwalk Community College

Christine LaVoie, Community Lawyer for Winsted Connecticut, expressed the concerns of the Winsted community by stating in the Connecticut Mirror of December 8, 2017, that “Students First” developed with little or no faculty or regional input, centralizes needed local functions, continues unchecked growth of the central office, uses undemocratic approval procedures, and is harmful to local campuses...” (Letter attached.)

It appears that \$28 million will be stripped from the Community Colleges to create a single centrally administered College according to the Board of Regents plan without the benefit of public scrutiny or legislative review. The remaining \$13 million, [to make up the \$41 million total] would be a **shared** reduction for the universities, the current system office, and again the community colleges to effect administrative consolidation. So the Community Colleges would lose nearly \$32 million, a clearly disproportionate share of the sacrifice.

While change can be a positive force, planning for change should be thoughtful and thorough. The opinions of experienced leaders and expert stakeholders should be sought, and substantive financial analysis should support any proposal for substantive change. None of this has been the case with the Board of Regents and its Students First plan. Our students deserve the full array of instructional and support services, innovative programs and technology support at every campus. Our communities deserve institutions with locally focused administrative and academic leadership to meet the needs of local businesses and communities through innovative programs supported by state resources flowing from those communities. The individual colleges are educational, economic, and cultural hubs in their regions, and they were instituted by the General Assembly over many years in response to community needs and citizen demands. To rob those communities and their citizens of college resources and leadership is a strategy for impoverishment.

We urge the Commission on Institutions of Higher Education to reject the Board of Regents’ proposed consolidation of Connecticut’s Regional Community Colleges on the basis that it does not address the needs of community college students or preserve educational services and quality in any meaningful manner and is therefore inconsistent with NEASC’s accreditation standards.

Respectfully submitted on behalf of the Connecticut Community College Round Table,

Cathryn Addy, President Emerita, Tunxis Community College wisedog@juno.com

Mary Anne B. Cox, Past Chair, Middlesex Community College Foundation
maryannebarrycox@gmail.com

Jonathan Daube, President Emeritus, Manchester Community College daubejm@gmail.com

Jules Lang, Esq., former Trustee, CT Community College Board of Trustees Jules.Lang@snet.net

Robert Miller, President Emeritus, Quinebaug Valley Community College millerbobsyl@aol.com

List of Attachments

1. NEASC standards vs single college model. Community College Round Table
2. Viewpoints: The Connecticut Mirror, Dec. 2017 Bill Curry, former CT Comptroller
3. Viewpoints: the Connecticut Mirror, Dec. 2017 Charlene LaVoie, Winsted Community Lawyer
4. Hartford Courant, Faculty Speak Out Against Community College Consolidation Plan
Dec. 12, 2017
5. Letter to BOR: Middlesex Community College Foundation September 2017
6. Questions to BOR: Middlesex Community College Foundation October 2017
7. 4Cs Delegate Assembly Opposes CSCU Restructuring November 6, 2017
8. Community College Governance Association statement November 12, 2017
9. Letter to the Editor, Norwalk Hour, "A faulty plan" November 2017
10. CT Post, "Consolidation Plan raises tons of question" November 8, 2017
11. Norwalk Hour, "NCC Faculty oppose merger" November 22, 2017
12. Letter to the Editor, CT Mirror Dr. Estela Lopez July 17, 2017
13. Merger plan ... remains controversial, CT Post December 22, 2017
14. Letter to the Norwich Bulletin Bill Brower December 24, 2017

Questions, in italics, explore the ability of a single, “centrally managed college” to meet the requirements of NEASC accreditation standards. Source: Community College Round Table, May 2017

Standard 1. Mission and Purpose

Each college’s mission and purpose “define its priorities and plans for the future and provide a basis for evaluating its endeavors. The mission and purpose direct the curricula and other activities, such as community development, and are the foundation upon which student expectations for learning are developed.”

What would the mission and purpose of a new “single college model” be besides increasing the reductions already endured by community college budgets during the last five years within the CSUS system?

Standard 2. Planning

“The institution undertakes planning and evaluation to accomplish and improve the achievement of its mission” through “strategic, academic, financial, and other resource planning ... and allocates sufficient resources to planning and evaluation.”

These are apparently the functions that would be centralized in the System Office with the stated goal of reducing costs. Individual institutions would be deprived of institution-driven and student-centered planning that has been the foundation of programs and services designed to meet different student and community needs. Students and communities do vary even within a small state like Connecticut. Students from communities in Fairfield County have different needs from students and communities from Windham County. Which group receives the benefit of the reduced funding and staffing for planning and evaluation at the “single college” in Hartford?

Standard 3 – Organization and Governance

“Through organization design and governance, the institution creates and sustains an environment that encourages teaching and learning, service, scholarship, research and creative activity... [administrative] capacity is demonstrated by assuring provision of support adequate for the appropriate functioning of each organizational component.”

With hundreds of positions held vacant over the last five years to cope with declining budgets, the majority of community colleges have suffered a downward spiral of declining resources and lower enrollments. Funding for new programming has become dependent largely on Federal funding.

NEASC requires that a “Governing Board demonstrate sufficient independence to ensure it can act in the institution’s best interest and in Standard 7: Institutional Resources, that the Board “retains autonomy in budget and finance matters including for institutions that rely on support from a sponsoring entity – the state, church or other - to ensure that the institutions ... demonstrate the ability to respond to financial emergencies and circumstances ... and are not dependent upon vulnerable financial resources.”

In five years of Regents' leadership, state funding can be described best as "vulnerable."

As a result, Standards 4: the Academic Program; Standard 5: Students (Services); Standard 6: Teaching, Learning, and Scholarship; and Standard 7: Institutional Resources have not benefitted from the support of the Board of Regents and the investment of State resources needed for services appropriate for the students served in terms of academic advising, counseling, instruction, and campus technology. To be compliant with the Standards, it is required that an institution "provide accessible and effective services designed to provide opportunities for students to be successful in achieving their goals."

It's impossible to expect that a "single-college model" with a budget reduction of \$41 million or more will be able to change this situation in any positive way.

Perhaps most clearly missing from the Students First plan is any acknowledgement of Standard 9 related to Integrity, Transparency, and Public Disclosure. The "fast track" development and introduction of "strategies" ignored the requirement for integrity and transparency. The membership and work of "planning committees" were largely unknown. A document from President Ojakian from September 2017, called FAQs, lists 3 presidents as serving on the committees who have retired or left the system and twelve college leaders are referenced when actually 2 presidents are overseeing 4 colleges and one college has "an acting lead administrator" as its head. Institutional presidents have been largely excluded from the planning process.