

## Summary of the Institute for Higher Education Leadership and Policy Recommendations and a Community College Response

Source: "It Could Happen: Unleashing the Potential of California's Community Colleges to Help Students Succeed and California Thrive"

### Recommended Student Success Strategies: **INCREASED READINESS**

*Criticism:* Poor alignment of high school and community college curriculum.

#### **CC Potential Response:**

##### **Concurrent Enrollment**

One of the ways that community colleges are working to align curriculum is through use of concurrent enrollment; however, we are limited in both the type of courses and numbers of students who can be taught, especially during the summer. Community colleges can do much to streamline transitions and promote concurrent enrollment in areas most needed/useful, but must address existing statutory barriers to concurrent enrollment. Currently, on the Governor's desk, is legislation to extend, until January 2014, current law exemptions to the 5% summer enrollment limit on the number of high school students who may attend community college summer sessions. When students take college-level courses while in high school, either at their high schools or at college campuses, they are challenged to complete college-level work, use more sophisticated equipment, and interact with a more mature student body.

##### **American Diploma Project**

A national nonprofit education group, *Achieve*, has developed a program called the American Diploma Project (ADP) to align K–12 math and English standards with the demands of colleges and the workforce. California community colleges are playing a major role in determining whether and how the ADP should be implemented in California. At the current time, although the segments of public higher education collaborate on documenting expected competencies for incoming freshmen, these competencies are not used in the development of the state K–12 standards or to inform curriculum for grade 12 in language arts or grades 8–12 in mathematics.

##### **Career Technical Education**

The Governor's Career Technical Education (CTE) Initiative has provided \$82 million since 2005 towards programs to support and improve education pathways and career technical awareness at both the K–12 and community college levels, and to improve linkages and articulation between CTE programs operating in both systems. The program is funded through fiscal year 2013–14. Through the Statewide Academic Senate project – "Statewide Career Pathways: Creating School to College Articulation" – articulation templates within various discipline areas have been created with wide endorsement by the community college system. These templates establish the opportunity for statewide transferable articulation agreements by defining course content expectations. As more secondary CTE programs are established or refurbished and aligned with standards, students' options for seamless continuing study into the community college will increase. This articulation effort is a subpart of the broader mission of ensuring access to quality career and technical education programs.

##### **Early Assessment Program**

SB 946 (on the Governor's desk) – sponsored by the Board of Governors – establishes the Early Assessment Program for California community colleges providing them the opportunity to play an important role in working with high school seniors in need of strengthening their academic skills in English and mathematics while still in high school.

##### **The College Bridge**

The Victor Valley College Bridge Program was created in 2006 by the college and its local high schools under the umbrella of a Title 5 Hispanic Serving Institutions Cooperative Grant. Students complete career exploration and learn about the process of entering postsecondary education through in-class lessons and a dynamic interactive web-based approach in which students create their own web pages that serve as a powerful communication tool for connecting prospective students to postsecondary opportunities and information. The Bridge Program has six goals:

- 1) 70 percent of high school seniors apply to a postsecondary institution;
- 2) High school seniors become ambassadors for the program;
- 3) Community colleges become the home base for K–14 coordinated education;
- 4) Communication and collaboration is improved among K–14 faculty, staff and administrators;
- 5) Academic preparation and subsequent college success is increased for all K–12 students, and
- 6) The Bridge process begins in 6th grade.

The 2008-09 System Budget request included a request to expand the program statewide, but it was not funded.

**Recommended Student Success Strategies: INCREASED READINESS, CONT.**

*Criticism:* Extreme variation in process and standards for assessment of English and math skills.

**CC Potential Response:**

While some see this as a problem, it should be noted that this variation allows colleges to tailor their assessments to their actual student population and curriculum. This is an example of how community colleges serve their communities.

However, in March 2007, the Board of Governors directed the Chancellor “to begin the process of evaluating the implementation of a system-wide uniform, common assessment...” The Chancellor was also directed to “study policy strategies for consideration by the Board of Governors in the following areas: non-barrier access, student success, early assessment, orientation, prerequisites, failure to participate, funding, exemptions.” ASCCC President Mark Wade Lieu and Executive Vice Chancellor Steve Bruckman are co-chairing a new Strategic Action Planning Group (APG) on assessment and placement to:

- 1) Evaluate and present recommendations regarding the recent reports from the Legislative Analyst’s Office and the California Community College Assessment Association with particular attention to the LAO recommendation to use the K–12 California Standards Test (CST) or the questions contained therein as a potential placement tool.
- 2) Evaluate and, if appropriate, provide recommendations on changes in the law (Education Code or Title 5) that would require students to begin remediation in their first term and to complete remediation prior to or concurrently with enrollment in related degree applicable courses. The APG would be expected to complete these tasks by June 2009.

*Criticism:* The message is about open access without a complementary message about standards.

**CC Potential Response:**

We proposed amendments to, and supported, SB 946 (ch. 473/2008) which provides access to the CSU augmented CST results so colleges can start working with students still in high school to inform them about our standards and help them to meet them. In addition, we need to devise additional methods for clarifying our standards for the public.

*Criticism:* Colleges are funded almost entirely on the basis of enrollment in the third week of the term, giving a disincentive to emphasize college readiness for fear of discouraging enrollment.

**CC Potential Response:**

While there may be a case for funding reform, any change to the funding mechanism needs to be considered carefully as any change may incentivize other undesirable outcomes. For example, if funding is based solely on success/completion, the unintended consequence may be to limit access to students who are more likely to succeed in order to maximize such outcomes. A balanced approach is needed. In addition, simply moving funds from one funding mechanism to another does little to help the system. When funding is already so limited, changing the funding mechanism will have little impact overall.

*Criticism:* The state discourages concurrent enrollment of high school students in community colleges.

**CC Potential Response:**

We agree and have worked tirelessly to have the law changed, both through support of SB 1437 (ch. 718/2008 – Padilla, Portantino), and through plans for a long-term strategy to increase our ability to offer more concurrent enrollment classes.

**Recommended Student Success Strategies: EARLY SUCCESS**

*Criticism:* Many students are not assessed, with huge variations among colleges.

**CC Potential Response:**

We agree but do not have matriculation funding to assess more students. We welcome any efforts to assist us in obtaining these funds because there are also the concomitant costs of providing more courses should these students be assessed into pre-collegiate courses and mandatory enrollment be enforced.

*Criticism:* Students are often allowed to enroll in courses for which they are not prepared to succeed.

**CC Potential Response:**

We do not have mandatory course enrollment because we would have to assess each course and conduct expensive statistical tests to be able to do so without violating students’ rights. (It should also be noted that this ties in directly with the next item on prerequisites and our response to it.)

*Criticism:* The onerous process of establishing course prerequisites leads many colleges to allow open access resulting in high failure rates.

**CC Potential Response:**

We agree that research shows certain students benefit from required course-taking patterns, but mandatory enrollment is not the same as limits on enrollment. We must be careful about mixing the two. While full course prerequisites require statistical testing, common assessments and better course alignment would make such work feasible as greater portions of CCC students statewide participate.

**Recommended Student Success Strategies: EARLY SUCCESS, CONT.**

*Criticism:* The state's financing formulas encourage open enrollment into courses because colleges are funded for third-week enrollment...

**CC Potential Response:**

While this is true, it is no different from the funding formulas for K-12, CSU or UC. Of all these systems, community colleges are probably the least able to control the outcomes for our students since K-12 attendance is mandatory, and CSU and UC have more homogeneous populations, a single mission (achievement of a baccalaureate degree), more funding for counselors, and students who were higher in their graduating classes. Therefore, if this change were to be attempted in higher education, it would make more sense to pilot-test it at CSU or UC.

**Recommended Student Success Strategies: CLEAR GOALS AND PATHWAYS**

*Criticism:* Students in the community college system are provided minimal initial counseling to help them understand their options and set program goals.

**CC Potential Response:**

This is due to lack of adequate matriculation funding and the inadequate ratio of counselors to students (approximately 1:1800). Administrators also argue that the 50% law limits the number of counselors that can be hired.

*Criticism:* The colleges do not emphasize the importance of credentials, and do not structure their certificate and degree programs to allow students to earn lower credentials on the pathway toward higher credentials.

**CC Potential Response:**

The importance of certificates is being strongly stressed by the system, and certificates, contrary to this statement, are generally structured such that certificate requirements plus general education result in students receiving degrees.

Community colleges have a "career ladders project" to do just this – it is "a work in progress." Noncredit instruction in 2008 will begin to generate certificate award data based on passage of SB 361(2006) and the creation of Career Development and College Preparation Certificates of Competency and Completion in Education Code §84760.5(a); and in 2007, the subsequent adoption by the Board of Governors of California Code of Regulations, Title 5, §55151. Colleges are required to report student award data through the Chancellor's Office Management Information System (COMIS) annually in August. As of this report, which is prior to the reporting deadline, and because this is the first full reporting period since the passage of SB 361, there is no data to report pertaining to the number of awards granted by colleges in the Career Development and College Preparation Certificates of Completion and Competency. Of the 382 certificates, 341 (89.3%) were Certificates of Completion and 41 (10.7%) were Certificates of Competency. The largest single category of all approved certificates was the short-term vocational program category with 205 (53.6%) of the total 382 certificates. This category was followed by the ESL/VESL category with 116 (30.4%) of all approved certificates. The basic skills category followed with a total of 52 (13.6%) of all certificates. In the workforce preparation category, 9 (2.4%) certificates were approved.

In addition to noncredit certificates, our colleges have locally-approved and offered a significant number of low unit credit certificates that lead to Certificates of Achievement, most of which lead to a degree. With recent Title 5 changes that permit approval of 12-18 unit credit programs and CSU GE and IGETC as Certificates of Achievement, the colleges have submitted to the Chancellor's office requests to convert 405 of these locally approved low unit certificates to Certificates of Achievement and over 900 requests for offering CSU GE and IGETC as Certificates of Achievement. Conversion of locally-approved certificates to Certificates of Achievement will permit colleges to document and transcript these awards demonstrating that students do earn lower credentials on the pathway to higher credentials.

*Criticism:* The state has not developed 'transfer associate' degrees to lay out a clear transfer path to the UC or CSU.

**CC Potential Response:**

While there is no statewide standard for a "transfer degree," this is due to several factors, chief among them the fact that inconsistent requirements across the UC and CSU systems make the development of such degrees problematic, particularly for students. Individual colleges have established degrees specifically for this purpose, but they are not labeled as "transfer degrees."

One approach that does work is the development of a common general education core, such as IGETC and CSU GE Breadth. However, impacted majors, space at the CSU in general and other factors often limit CCC student ability to transfer despite clearly meeting all requirements. And, with the recent focus on Title 5, 96 colleges have submitted applications for approval of revised degrees that are more appropriately designed for students intending to transfer.

*Criticism:* Few students receive a full complement of the matriculation services that are intended to set them on a path to success...

**CC Potential Response:**

Colleges would prefer to provide more students with a full complement of matriculation services but have been unable to do so due to insufficient funding, which suffered a 29 percent reduction from its 2001-02 base allocation that has yet to be completely restored even though the California Community College System budget has requested restoration of matriculation funds every year.

**Recommended Student Success Strategies: EFFECTIVE ENROLLMENT PATTERNS**

*Criticism:* California has assumed that low fees and fee waivers would provide affordable access to community colleges, but fees account for only 5% of college costs. There has been too little focus on providing financial aid for the larger costs of attendance including books and supplies, transportation, and living expenses.

**CC Potential Response:**

While it is true that fees account for only a relatively small portion of student costs for attending college, it remains important to keep these fees low since students, especially the most disadvantaged, drop out of college at significant rates with even the slightest increase in fees. This was demonstrated quite clearly when fees of \$5 per unit were initially assessed in 1984, with an estimated 10,000 students dropping out for every \$1 increase in fees. In addition, the greatest percentage of lost students with fee increases was African-American males – one of the groups we most want to reach. As for the issue of needing financial aid for the “larger costs of attendance,” we agree, but the funding formulas for financial aid are often skewed against community college students and in favor of those attending four-year and/or private colleges. The California Community College System has assumed leadership in efforts to reduce textbook costs. The Board of Governors, in May 2008, adopted a set of principles that would significantly reduce textbook costs. The Osher Foundation donated \$50 million for student scholarships. The Foundation for California Community Colleges is leading the effort to raise matching funds for an additional \$25 million in scholarships.

*Criticism:* Because of limited financial aid, too many community college students work too many hours and attend college only part-time resulting in low persistence and completion rates.

**CC Potential Response:**

We share this concern but have not been able to alter the patterns of financial aid determination and distribution. There are also cultural barriers to acceptance of some types of financial aid. A *Los Angeles Times* article described how Latinos, in particular, were very resistant to assuming financial aid in the form of loans. This pattern was also found by The Institute for Higher Education Policy and Excelencia in Education in their study, *Student Aversion to Borrowing: Who Borrows and Who Doesn't*, December 2008, which found that:

*“Students from certain racial/ethnic or immigrant groups may have a cultural or familial perspective on debt that encourages them not to borrow. . . Asian and Hispanic students were less likely to borrow, even if they had substantial unmet need. The lower likelihood of borrowing held true across all types of institutions, income quartiles, and categories of attendance, including full time, part time and mixed enrollment.”*

*Criticism:* Restrictions on on-campus employment deny students the opportunity to earn needed money while staying engaged with the campus community.

**CC Potential Response:**

We agree and would welcome assistance in being able to offer more on-campus employment.

*Criticism:* Current funding mechanisms based solely on enrollment encourage colleges to allow students to register late for classes.

**CC Potential Response:**

The reason to allow students to register late for classes is often to prevent them from having to wait until the following semester for a course – not as a means to gain increased funding.

*Criticism:* In order to maximize enrollment, few colleges place limits on course drops or repeats.

**CC Potential Response:**

Limits on repeat enrollments were added to the Education Code as part of AB 1725 (1988). In 2008 Title 5 regulations were amended to place new limits on drops and repeats.

**Recommended Student Success Strategies: INTENSIVE STUDENT SUPPORT**

*Criticism:* Restrictions on the use of funds can prevent college leaders from directing resources to provide services student need, especially for the under-prepared.

**CC Potential Response:**

Yes, this is a problem and we would welcome assistance in changing legislation that has created these barriers. However, central to this issue is the fact that chronic underfunding has, in many ways, created this strain on resources, where programs must compete with each other. Capacity is also a problem.

*Criticism:* Budgetary and other processes erect unnecessary barriers to collaboration between academic and student services professionals and to other innovations that integrate student services with academics.

**CC Potential Response:**

Yes, and we welcome any assistance to remove these barriers.

**Recommended Student Success Strategies: INTENSIVE STUDENT SUPPORT, CONT.**

*Criticism:* Too little professional development is available to help faculty and support services staff understand how to develop innovative pedagogical approaches and service delivery structures for student success.

**CC Potential Response:**

Yes, we agree. All professional development funds were deleted from the community college budget several years ago...and they have never been restored to their former level. The Basic Skills Initiative contains \$1.6 million annually for professional development.

*Criticism:* Orientation courses are voluntary at California community colleges and few students take advantage of the opportunity that such courses offer to help them better understand the college process and develop strategies for success.

**CC Potential Response:**

While orientation, as a matriculation service, should be considered as vital to all students enrolling in a community college, there seems to be confusion here between the service and orientation courses. Many students do not need to enroll in orientation courses, and forcing all students to take such courses may not be useful to either the students or financially prudent for the state.

**Recommended Student Success Strategies: USING DATA TO INFORM DECISIONS**

*Criticism:* California has no comprehensive K-16 data system to monitor students across the public K-12, community college, and university systems.

**CC Potential Response:**

We fully support SB 1298 which would establish a governing board to create a state data repository and integrate data from other state, federal and local agencies with existing education data, and by January 2010, to develop a strategic plan and feasibility study report for connecting longitudinal records from pre-kindergarten through higher education and into the workforce.

*Criticism:* No data are available at the California Community College System level to identify students who need remediation of basic skills, so outcomes for such students cannot be monitored.

**CC Potential Response:**

We, too, would like to have greater ability to identify students in need of remediation since it is both a local and a state priority. Our colleges are working very hard on a basic skills initiative to determine the best ways to meet these needs. At the same time, data specific to basic skills is being generated, and new rubrics are being developed to provide increased data regarding student progress and success in basic skills.

A task force focused on assessment and placement has been discussing various strategies to ensure student enrollment in courses consistent with their skill levels (reading, writing, mathematics) early in their college experience. Such strategies will identify students in need of remediation. With these strategies and the efforts made through the Basic Skills Initiative, the goal is to enroll these students in appropriate basic skills courses early in their career and track their progress.

*Criticism:* The California community college accountability reporting system does not track or report the progress of students until they complete 12 units and attempt a threshold-level English, math, or occupational course – preventing attention to a major problem of early dropouts. The system also does not track student progress and success by race/ethnicity.

**CC Potential Response:**

We question why the system should report on students who do not complete at least 12 units; do CSU and UC report on such students? Why (and how) would the system track student progress and success by race/ethnicity? Community colleges have the most complete accountability system (AB 1417—ARCC) of any of the higher education segments, and the annual supplemental ARCC report on ESL and basic skills includes nine additional metrics focused on ESL and basic skills students by gender, age and ethnicity. The Student Success metric in the framework for this report will track and report the progress of a student cohort beginning two or more levels below transfer level in ESL/English/mathematics through the basic skills sequence, to courses beyond basic skills, to certificate and degree completion, and to transfer.

*Criticism:* Some additional data are available at the college level but many colleges lack the research capacity to use such data for institutional improvements.

**CC Potential Response:**

This is not true; most colleges are currently using research for institutional improvement. This is an Accrediting Commission for Community and Junior Colleges (ACCJC) requirement. A few, small impoverished districts are fiscally unable to do this. There's no question this is a strain on the resources of many colleges, but they are doing it and it is delivering tangible results. The Research and Planning Group, comprised of researchers within the system, is currently proposing three options to assist such colleges to meet these data needs.

*Recommended Student Success Strategies:* **INSTITUTIONAL CULTURE INHIBITS STUDENT SUCCESS**

*Criticism:* Many priorities compete with student success across the large, diverse system with multiple stakeholders and a consensus model of decision-making.

**CC Potential Response:**

Student success is a major focus within the system and there are important strategies underway at all levels and among various constituent groups within the system to increase student success. The consensus model of decision-making is a good one which results in better informed decisions with wider support. There is also a consistent lack of focus on the factors we know are associated with student success – smaller classes, active learning, full-time faculty and learning communities.

*Criticism:* “Entrenched assumption” – Students are treated most fairly when there are minimal requirements and maximal choices because requirements are barriers and choices are opportunities.

**CC Potential Response:**

Our college personnel are primarily interested in assisting the greatest number of students to achieve the greatest-possible success. It is true that community colleges try to maximize options to provide opportunities because our students represent more diversity in income, ethnicity, ability and goals than those in a four-year institution and they cannot be treated in a more uniform way as one might at CSU or UC.

*Criticism:* “Entrenched Assumption” – Countless statewide rules and regulations are needed to specify and monitor how each college uses its financial and human resources as a means of ensuring appropriate local decision making.

**CC Potential Response:**

Most of those “countless statewide rules and regulations” come from the Legislature or control agencies, rather than from within the system itself. In fact, we are often criticized, in the “Shulock” reports as well as others, for insufficient uniformity. (See our discussion above re: the differing standards for assessing math and English skills.)

*Criticism:* “Entrenched Assumption” – Equity in resource allocation is principally about equity to districts, not necessarily to students.

**CC Potential Response:**

Yes, this is true – just as equity in resource allocation at UC and CSU is based on student enrollments, not on level of instruction or discipline area. It would be nothing short of “mind-boggling” to try to adjust revenues based on student course-taking patterns.

*Criticism:* “Entrenched Assumption” – ‘Success’ in community college is not appropriately measured by completion of an academic program.

**CC Potential Response:**

This is true – we determine “success” by seeing if a student has met his or her goal -- not an arbitrary one set by a four-year college standard. As mentioned above, all undergraduate students at UC/CSU are there to earn a baccalaureate degree, while community college students have a variety of goals, including transfer, learning English to get a job, increasing one’s skill to be able to advance in a job, getting an occupational certificate, and others. Strategic Plan section D2 directs us to develop comprehensive measures of success appropriate for community colleges. We are currently designing a classification system to evaluate the success of students who are not seeking transfer, degrees or certificates. Once these classifications are established, success measures will be determined for each.

*Recommended Student Success Strategies:* **RECOMMENDED CHANGES IN FINANCE POLICY**

*Criticism:* Increase the state’s investment significantly in educating community college students seeking a credential, basic skills or workforce advancement.

**CC Potential Response:**

We agree; but this is a legislative decision which is beyond our control and which we continue to try to change.

*Criticism:* Allow districts to retain fee revenue on top of the state appropriation.

**CC Potential Response:**

This is a very contentious item for our system and many believe that retaining fee revenue in no way enhances funding for a system except perhaps in an initial year. The CSU and UC, both of whom retain fee revenue, are testaments to the fact that such an approach results in the state further abrogating its responsibility to fund higher education and putting the burden of costs increasingly on students.

*Criticism:* Adopt differential per-unit fees – with a lower per-unit charge for full-time course load.

**CC Potential Response:**

We would be very supportive of a lower per-unit charge for those taking a full-time course load; however, this is a legislative decision and it has never been proposed in any piece of legislation to date.

*Recommended Student Success Strategies:* **RECOMMENDED CHANGES IN FINANCE POLICY, CONT.**

*Criticism:* Increase the size of the Cal Grant Award to help students defray the non-fee costs of college.

**CC Potential Response:**

We agree and would appreciate assistance from any one or group who can help get this through the legislative process.

*Criticism:* Provide a budget for the Chancellor's Office consistent with its mission to lead the largest segment of higher education in the state.

**CC Potential Response:**

We agree – at last count, our Chancellor's Office had approximately 160 employees, compared with 600 and 2000 at CSU's and UC's central offices, respectively.

*Criticism:* Incorporate fiscal incentives for cooperation between K–12 and community colleges on college readiness into K–14 education.

**CC Potential Response:**

We agree – our faculty make consistent efforts at working with K–12 schools, and we are trying to increase our ability to do so through our support of SB 1437 – Padilla/Portantino (concurrent enrollment) and our amendments to SB 946 – Scott (which will give us the ability to obtain 11th-graders' CSU augmented California Standards Test [CST] so that we can work with the high schools and the students to engage and motivate them during their final years of high school.

SB 70 has also funded significant collaborations between K–12 and community colleges, particularly in the areas of student preparation and articulation of courses in the CTE (Career Technical Education) area.

*Criticism:* Reduce the portion of the base allocation to districts that comes from 3rd week enrollment and incorporate incentives for student progress and success.

**CC Potential Response:**

This could be workable if combined with adequate funding for programs and support – however, we would need more detail to understand what is intended by this recommendation.

*Criticism:* Provide enriched funding levels for serving under-prepared and low-income students with added incentive for graduating such students.

**CC Potential Response:**

If this recommendation were adopted, we would be able to better serve these students and graduate more of them. We know what works for these students, but simply don't have the financial resources to be able to provide the level of support services and categorical programs (such as Puente) which are known to significantly increase success but are underfunded year after year despite research evidence of their effectiveness.

*Criticism:* Change allocation formulas of categorical programs to encourage the outcomes that categorical programs are intended to achieve.

**CC Potential Response:**

It could be reasonable to provide colleges with extra incentive funds for these programs, but when categorical programs continue to be underfunded and there are so many other factors that affect student outcomes, it would be inappropriate to simply base any significant amount of funding solely on outcomes. The four-year segments have relatively low graduation rates but their funds are not reduced proportionately.

*Criticism:* Incorporate incentives for offering high-need, high-cost programs into the base funding model.

**CC Potential Response:**

This could be appropriate but would have to be very carefully done so as to not eliminate the equalization provisions in the current new funding model. This proposal also presents the issue of how to define "high-need." Both nursing and airplane technician programs are essential to public safety. Clearly nurses have a higher impact currently - but if funding for aviation technicians disappears, this might become the high-need. The cyclical nature of this definition is problematic.

*Recommended Student Success Strategies:* **MORE FLEXIBILITY IN COLLEGE USE OF RESOURCES TO MEET LOCAL NEEDS**

*Criticism:* Modify the 50% law to incorporate all but administrative and facility expenditures to allow colleges to find the best mix of academic, academic support, and student support services to promote student success.

**CC Potential Response:**

While administrative groups within the community college would find this a good recommendation, faculty groups disagree, especially in light of the chronic underfunding of the system. And, in recent years, no legislator has been willing to carry a bill which would significantly modify the 50% Law without the “buy-in” of all community college organizations. This shows that one cannot simply take these recommendations singly; rather, they must be implemented as a package which would provide adequate on-going funding so that administrators could commit to hiring a good complement of full-time instructors.

*Criticism:* In conjunction with an allocation formula that rewards student progress and success, minimize rules that prescribe how colleges are to spend their funds.

**CC Potential Response:**

We would need more information on how much funding is based on student progress and success, and if adequate funding is available before we could fully analyze this recommendation. To date, there are no allocation for performance methods that have resulted in increased student success without decreasing the number of students who are used to create the statistics. Look at Texas – eliminate the neediest students and you get **great** student success data.

*Criticism:* Eliminate or re-design categorical programs that create silos between academic affairs and student affairs and prevent colleges from adopting college-wide priorities for resource allocation and holistic approaches to education.

**CC Potential Response:**

This is an interesting recommendation – we would like to see more detail and work with the author to create these alternative “holistic” approaches to education.

*Criticism:* For remaining categorical programs, minimize requirements for how funds must be used and focus accountability on ensuring that program objectives are met.

**CC Potential Response:**

This is another interesting recommendation, but we would need additional detail to determine whether it would be workable.