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April 25, 2018

Mr. Mark E. Ojakian  
President  
Connecticut State System Office  
61 Woodland Street Rm 302  
Hartford, CT 06105

Dear Mr. Ojakian:

At its meeting on April 19, 2018, the Commission on Institutions of Higher Education considered the report *Students First: Securing Connecticut's Future through Excellence in Higher Education* submitted by the Connecticut State College and University System and took the following action:

that the report *Students First: Securing Connecticut's Future through Excellence in Higher Education (Students First)* submitted by the Connecticut State College and University System (CSCU) be received for consideration;

that, given the magnitude of the change, the proposed Community College of Connecticut be considered as a new institution, not as a substantive change to the current twelve accredited community colleges;

that the proposed Community College of Connecticut be declared eligible to apply for candidacy for accreditation;

that, following the preparation of a self-study, a comprehensive evaluation be scheduled no sooner than Spring 2019 to determine if the institution will meet the Commission's requirements for candidacy;

that the CSCU System inform the Commission no later than July 30, 2018 if it plans to pursue candidacy for the proposed institution as outlined in this letter, if it wishes an extension of time before the candidacy visit, or if it decides to pursue other alternatives to address the financial challenges and improve student outcomes as outlined in the *Students First* report;

that if the CSCU System decides to pursue candidacy for the proposed Community College of Connecticut, the System along with the Presidents of the community colleges work with Commission staff to develop an appropriate schedule for transition and the process for an appropriately participatory self-study;

that the twelve separately accredited community colleges be continued in accreditation, with the previously determined requirements for scheduled monitoring in place.

The Commission gives the following reasons for its action.

The report was received for consideration because it addressed two important issues facing the Connecticut Community Colleges: significant financial challenges and low graduation rates at several of the institutions. As acknowledged in the report, the Commission has expressed its concerns on these matters in recent actions.

The Commission appreciates that the proposed institution will not reduce the number of faculty or other student-facing positions. Also, we are gratified to learn of the commitment to the Guided Pathways model as a way of promoting student success, along with the proposed provision of an academic plan for each student.

Given the magnitude of the proposed change, combining twelve separately accredited institutions into a single institution, the Commission determined that rather than being a substantive change, the Commission was instead being asked to consider a (proposed) new institution. The Commission has not seen, and is not aware of, a proposed change of this magnitude in New England or elsewhere in the U.S. While there are other states with a single community college – Rhode Island and Vermont in New England, and Indiana and Wisconsin elsewhere – these other institutions were created as single institutions with multiple campuses rather than by combining a significant number of existing institutions into one. Given the magnitude of the proposed change, the Commission determined that to ensure minimal disruption for students, planning, including the investments needed to support the proposed changes, would need to be demonstrated at a high level.

The Commission did not approve the proposed Community College of Connecticut as an accredited institution because, based on the *Students First* report and as explicated below, it did not find that the institution will have “assembled and organized those resources necessary to achieve its purposes” (Preamble, *Standards for Accreditation*) at the time of its initial operation. Further, the Commission finds that the proposed institution does not now meet the following two of four Criteria for Candidacy (enclosed):

2. has, with the intention of meeting the Commission’s *Standards for Accreditation*, effectively organized sufficient human, financial, learning, and physical resources into educational and other activities so that it is accomplishing its immediate educational purposes;
3. has established and is following realistic plans to acquire, organize and appropriately apply any additional resources needed to comply with the Commission’s *Standards for Accreditation* within the candidacy period.

The Commission declared the proposed Community College of Connecticut as eligible to apply for candidacy because we believe that the proposed institution will meet the Commission’s Requirements of Affiliation (enclosed). As is standard practice, one purpose of the visit for candidacy is to confirm that the institution does meet the eligibility requirements.

Eligibility is the first step in becoming accredited. Candidacy is attained through a comprehensive evaluation. Eligibility does not guarantee candidacy, and candidacy does not assure accreditation. By federal regulation, an institution may remain in candidacy status for no longer than five years. Students at candidate institutions that are approved by the Department of Education to participate in Title IV grants and loans may be eligible for federal aid. Institutions that are eligible but are not candidates or accredited institutions may not participate in Title IV.

While the Commission notes that some significant action is needed given the financial situation in Connecticut and applauds the emphasis on increasing student success through the use of Guided Pathways and individualized student plans, it finds that planning to transition to a single institution is in its early stages. Further, while institutionally centralized fiscal operations are relatively easy to accomplish and consistent with community college practices elsewhere, centralizing the academic functions will be a complicated process requiring time and investment beyond what is demonstrated in the report. The Commission's concerns relate to our standards on *Planning and Evaluation*; *Organization and Governance*; *The Academic Program*; *Students*; *Teaching, Learning, and Scholarship*; and *Institutional Resources*.

The Commission is not persuaded that planning for the new Community College of Connecticut is realistic. Because of the magnitude of the proposed changes, the proposed timeline, and the limited investment in supporting the changes, the Commission is concerned that the potential for a disorderly environment for students is too high for it to approve the proposed Community College of Connecticut as a candidate for accreditation based on the *Students First* proposal. Many of the matters needed to assure a smooth transition, including alignment of academic programs, are in the early stages of development, and the Commission does not yet have confidence that sufficient progress will be made on implementation in the proposed two-year timeframe to ensure the College will be able to provide a clear and orderly environment necessary to support students. We further note the considerable time and effort that will be required to accomplish the proposed consolidation of 434 current degree programs into 225-250 degree programs, providing a way to ensure that identically named programs are in fact identical, while retaining certain unique programs at individual locations. We believe that this program rationalization, while necessary for a single community college, will take longer and require greater investment to support faculty and administrator time than is reflected in the current proposal. We are further concerned that consolidating the institutional research functions into the System office rather than at the institutional level will not provide the institution and the campuses with sufficiently responsive information and feedback to support planning and evaluation. Overall, we find that the investment of time and resources required to achieve the stated outcomes under the timeline described not to be realistic. Our standards on *Planning and Evaluation*; *The Academic Program*; *Teaching, Learning, and Scholarship*; and *Institutional Resources* provide this guidance:

The institution. . . identifies its planning and evaluation priorities and pursues them effectively. The institution demonstrates its success in strategic, academic, financial, and other resource planning and the evaluation of its educational effectiveness (*Planning and Evaluation*, Statement of the Standard).

Institutional research is sufficient to support planning and evaluation. The institution systematically collects and uses data necessary to support its planning efforts and to enhance institutional effectiveness (2.2).

The institution plans for and responds to financial and other contingencies, establishes feasible priorities, and develops a realistic course of action to achieve identified objectives. Institutional decision-making, particularly the allocation of resources, is consistent with planning priorities (2.4).

The institution works systematically and effectively to plan, provide, oversee, evaluate, improve, and assure the academic quality and integrity of its academic programs and the credits and degrees awarded. The institution sets a standard of student achievement appropriate to the degree or certificate awarded and develops the systematic means to understand how and what students are learning and to use the evidence obtained to improve the academic program (*The Academic Program*, Statement of the Standard).



The institution undertakes academic planning and evaluation as part of its overall planning and evaluation to enhance the achievement of institutional mission and program objectives. These activities are realistic and take into account stated goals and available resources. Additions and deletions of programs are consistent with institutional mission and capacity, faculty expertise, student needs, and the availability of sufficient resources required for the development and improvement of academic programs. The institution allocates resources on the basis of its academic planning, needs, and objectives (4.7).

There are an adequate number of faculty and academic staff, including librarians, advisors, and instructional designers, whose time commitment to the institution is sufficient to assure the accomplishment of class and out-of-class responsibilities essential for the fulfillment of institutional mission and purposes. Responsibilities include instruction, accessibility to students, and the systematic understanding of effective teaching/learning processes and outcomes in courses and programs for which they share responsibility; additional duties may include, e.g., student advisement, academic planning, and participation in policy-making, course and curricular development, research, and institutional governance (6.2).

The institution has sufficient human, financial, information, physical, and technological resources and capacity to support its mission. Through periodic evaluation, the institution demonstrates that its resources are sufficient to sustain the quality of its educational program and to support institutional improvement now and in the foreseeable future (*Institutional Resources*, Statement of the Standard).

While the Commission is gratified to learn of plans to use the Guided Pathways model to improve measures of student success, providing an academic plan for each student will take additional time and significant investment in training and professional development for the faculty and staff who will develop these plans and use them to support and increase student success. In addition to the standard on *Planning and Evaluation*, cited above, our standard on *Students* is pertinent in this regard:

[The institution] endeavors to ensure the success of its students, offering the resources and services that provide them the opportunity to achieve the goals of their educational program as specified in institutional publications. The institution's interactions with students and prospective students are characterized by integrity (*Students*, Statement of the Standard).

The institution ensures a systematic approach to providing accessible and effective programs and services designed to provide opportunities for enrolled students to be successful in achieving their educational goals. The institution provides students with information and guidance regarding opportunities and experiences that may help ensure their educational success (5.7).

The institution provides advising and academic support services appropriate to the student body. The institution's faculty and professional staff collectively have sufficient interaction with students outside of class to promote students' academic achievement and provide academic and career guidance (5.10).

A clear description of the nature, extent, and availability of student services is readily available to students and prospective students. Newly enrolled students are provided with an orientation that includes information on student services as well as a focus on academic opportunities, expectations, and support services (5.11).

The institution ensures that individuals responsible for student services are qualified by formal training and work experience and organizationally placed to represent and address the needs of students effectively. Personnel, facilities, technology, and funding are adequate to implement the institution's student services policies and procedures (5.17).

In addition, we are concerned that the proposed institution does not appear to have sufficient support for academic administration to plan, oversee, and evaluate the hundreds of academic degree and certificate programs, given that the chief academic officer will also be the chief student affairs officer and have only three other staff in the office (an administrative assistant, an executive director of retention and completion, and a registrar). At the campus level, department chair and division director positions will be eliminated, to be replaced with program coordinators and academic discipline coordinators, with one academic officer per campus (which position, on the smaller campuses, will also serve as the chief student affairs officer). It is not clear how faculty can act in concert across up to twelve campuses to oversee the quality of the academic program. While this concern applies to all academic programs, it can be illustrated by the lack of clarity on how the specialized accreditation process would be overseen for multi-campus programs, such as nursing. Further, given the lightly staffed office of the provost, we are not persuaded that the institution's chief academic officer will have the capacity to provide the important academic leadership required of what would be one of this country's largest community colleges. We encourage the CSCU System to benchmark its plans for academic administration at the central, disciplinary, and campus levels against the support provided at other large community colleges. Our standard on *Organization and Governance* specifies that the institution "demonstrates administrative capacity by assuring provision of support adequate for the appropriate functioning of each organizational component" (*Organization and Governance*, Statement of the Standard) and further specifies that:

The chief executive officer assures that the institution employs faculty and staff sufficient in role, number, and qualifications appropriate to the institution's mission, size, and scope (3.12).

The institution's chief academic officer is directly responsible to the chief executive officer, and in concert with the faculty and other academic administrators, is responsible for the quality of the academic program. The institution's organization and governance structure assure the integrity and quality of academic programming however and wherever offered. Off-campus, continuing education, distance education, correspondence education, international, evening, and weekend programs are clearly integrated and incorporated into the policy formation, academic oversight, and evaluation system of the institution (3.14).

The institution places primary responsibility for the content, quality, and effectiveness of the curriculum with its faculty. Faculty have a substantive voice in matters of educational programs, faculty personnel, and other aspects of institutional policy that relate to their areas of responsibility and expertise (3.15).

The timing of the visit for candidacy was set for no sooner than Spring 2019 both to provide time to prepare the self-study, as discussed in this letter, and to give the Commission sufficient time to develop a team equipped to consider the proposed institution. Should the CSCU System proceed with this option, the Commission will consider the results of the comprehensive evaluation at one of its meetings during the semester following the visit; i.e., if the visit takes place in Spring 2019, the Commission will make its determination about the candidacy status of Community College of Connecticut in Fall 2019.

The Commission realizes that in pursuing candidacy, the CSCU System may decide to make changes in the plans outlined in this report. Indeed, the Commission believes that some changes

are necessary, including increasing the capacity of academic administration and providing the realistic investment to make the proposed changes. We also realize that the CSCU System may decide to pursue alternative plans, and the Commission and its staff are prepared to work with the System, its board, and the twelve institutions should that be the case. As noted above, we ask that you inform the Commission of your decision no later than July 30, 2018.

If the CSCU System decides to pursue candidacy for the proposed Community College of Connecticut, the System along with the Presidents of the community colleges are asked to work with Commission staff to develop an appropriate schedule for transition and the process for an appropriately participatory self-study. Commission staff are prepared to be helpful to you.

The twelve community colleges in Connecticut will continue in accreditation until the Community College of Connecticut becomes a candidate institution, at which time the Commission will determine a date for the current community colleges to relinquish their accreditation, based on the date of transition after which students will graduate from the Community College of Connecticut.

As you know, the Commission asked for a review of the plan by the National Center for Higher Education Management Systems, and our analysis is generally consistent with theirs, which we will make available to you at your request.

The Commission expressed appreciation for the report submitted by the Connecticut State College and University System and hopes that its preparation has contributed to further planning. We appreciate your cooperation with the effort to provide public assurance of the quality of higher education in New England.

You are encouraged to share this letter with all of the System's constituencies. It is Commission policy to inform the chairperson of the institution's governing board of action on its accreditation status. In a few days we will be sending a copy of this letter to Mr. Matt Fleury. The System and the twelve community colleges are free to release information about the report and the Commission's action to others, in accordance with Commission policy.

If you have any questions about the Commission's action, please contact Barbara Brittingham, President of the Commission.

Sincerely,



David P. Angel

DPA/jm  
Enclosures

cc: Mr. Matt Fleury, Chair  
Dr. James P. Lombella, Asnuntuck Community College/Tunxis Community College  
Dr. Wilfredo Nieves, Capital Community College  
Dr. Paul Broadie, Gateway Community College/Housatonic Community College  
Dr. Gena Glickman, Manchester Community College  
Dr. Steven Minkler, Middlesex Community College  
Dr. Daisy Cocco De Filippis, Naugatuck Community College  
Dr. Michael Rooke, Northwestern Community College  
Dr. David L. Levinson, Norwalk Community College  
Dr. Carlee Rader Drummer, Quinebaug Valley Community College  
Dr. Mary Ellen Jukoski, Three Rivers Community College