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Office of the College President

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June 15, 2009

Wendy Macias
U.S. Department of Education
1990 K St. NW Rm. 8017
Washington, DC 20006

Re: Negotiated Rulemaking and Persistence/Completion Forum, Philadelphia session of June 22-23.


Dear Ms. Macias:

Attached are my comments with special emphasis on persistence and completion and additional comments on the topics under consideration in the negotiated rulemaking session.

I appreciate the opportunity to contribute to these important topics and look forward to the Department of Education's continued support for our institutions.

Sincerely,

[Redacted Signature]



Department of Education Forum
June 23, 2009

It is with great satisfaction that I submit testimony on the topic of persistence and completion in higher education. That the Department of Education is hosting public forums on the topic is very gratifying for an educator who has spent an entire career addressing the challenges of access, persistence and success in college. In my estimation, it is the most glaring and essential challenge we face, one that confronts every level of American education.

But it is a challenge that transcends the strategies we employ. Today, the alarming reality is creeping into public awareness: barely 70% of our students graduate from the nation's public high school, with only half gaining a diploma in our 50 largest cities. Less than half of those who enter college are not prepared for college level work, with upwards of 75% needing remedial support in our urban colleges. The reasons are many and complex but the bottom line is that too many of our students have been allowed to lose touch with the value of learning, and in that sense, they have lost touch with themselves. At epidemic proportions, this is a condition of utter gravity for the nation.

So this is our challenge: to remind our students that learning is their birthright. And to be successful, we must acknowledge to ourselves that we are in remedial mode, and bring to bear the resources necessary to significantly improve student success.

Public awareness

Success in college is a two way responsibility. If institutions become better able to support student success, then students - and their families - need to understand the importance of gaining a postsecondary credential and, just as important, the required preparation in pre-college years and the hard work and rigor of college study. Estimates suggest that as many as 80% of new jobs in the U.S. requiring postsecondary learning. Lifetime income swells with a college education, outpacing a high school

diploma's value by \$400K and \$1.2 million, respectively, for 2-year and 4-year degrees. The low-income and minority students who have fallen by the wayside in too large numbers need to recognize that a lifetime of low-income jobs and perhaps, worse outcomes, await those who forego a college education.

Recommendation: Commensurate with additional funding and capacity to support enrollment and student success, develop a nationwide promotional program to introduce and elucidate the possibilities in going to college, be it for short-term occupational training, 2-year or 4-year degree completion. A "Yes You Can" campaign for American education.

Support for America's community colleges

The nation's nearly 1,200 community colleges are home to 46% of all undergraduate students, among them the overwhelming majority of African American and Hispanic students in our colleges and universities. Three out of five students attend part-time and the average age is 29, though close to half are traditional college-going age. Approximately 80% of community college student hold jobs as they study. Average annual costs are approximately \$2,300, about one-third of the average costs for public four-year institution.

These are the facts but what doesn't fit in a statistical survey is the range of possibility offered to these students, both in academic programs and necessary student support. These are gateway institutions - to the workforce, the mainstream economy, the middle class and four-year institutions of every ilk. These are the institutions - perhaps the only institutions - that are primed to significantly increase access to a college education and provide the necessary support toward successful program completion.

Additional facts, however, clarify that community colleges do not receive adequate support at the state level. In Florida, community colleges student FTE allocation is less than one-third of the state universities' funding per FTE for the same freshman and sophomore students.

Recommendation: Recognize community colleges' contribution to community and national economic stability and growth. Do so via a

Title 1 type of funding approach that recognizes the many challenges that community colleges and their students face (see “Completion” recommendations). Support should be directed to the community college mission, specifically innovation in academic programs that support the economy and extensive student support initiatives to improve persistence and completion. Ensure a system of support that encourages gradual institutionalization of successful programs.

Persistence

We need to attend to the developmental needs of many students. Unlike the majority of students who attend the nation’s universities, large percentages of community college students face economic and personal challenges that directly affect their academic performance. Persistence efforts must recognize these realities and provide the necessary support. In many colleges, innovative programs of support have been instituted with clear success, verified by research data. However, the resources to expand these programs and additional innovations are not available.

Recommendation: Provide federal support for a full range of innovative academic approaches and student support that improve persistence. Program elements include: 1) robust first-year-in-college program that integrates students into the college community and establishes a supportive environment; 2) expanded college entry assessment that identifies specific academic and non-cognitive needs, drilling well beyond the mere categories of “remedial” or “college ready”; consider encouragement for mandatory college entry assessment and mandatory placement into required remedial courses; 3) systems of early and ongoing intervention and advisement; 4) additional faculty and support staff to lower class/lab and advisement ratios; 5) student life skills seminars and courses that address time and stress management, study skills, self confidence and other success factors.

Recommendation: Develop a national registry/database of persistence and completion strategies that detail the various initiatives and assign them to recognizable categories of institutions, disciplines, teaching methodologies and other searchable key words.

Recommendation: Establish a national “Developmental Teaching Institute,” expanding significantly on the present teaching methods available for developmental teachers. Borrow from the best of community college strategies and the database indicated above. Locations could be spread across the country, perhaps in community colleges, to train teachers to serve in school systems and colleges.

Recommendation: Support collaborative efforts between community colleges and public school systems to more effectively prepare students in high school for college level work; export successful developmental strategies to high schools via a collaborative approach.

Completion

Level the playing field. This must be the operative understanding in defining completion and establishing practical criteria for support. As indicated in the *Persistence* section, community colleges and many urban institutions and their students confront extreme challenges born of poverty, cultural diversity and other factors. Performance assessment must take into consideration these factors. Without such consideration, support and success will be limited to those institutions that meet, heretofore, largely gross, inarticulate standards of completion.

Recommendation: Establish a success index for higher education institutions; index would be weighted according to a range of criteria including: 1) poverty/income; 2) # and volume of Pell grants; 3) # of first generation students; 4) # of entering students underprepared for college level work; 4) standardized test scores; 5) English proficiency and more. Institutions that demonstrate the least amount of challenges as per the criteria would be expected to achieve high completion rates, while those confronting steeper challenges would be afforded flexibility in completion expectations. The question would then be: how well is a particular institution performing given the challenges its students face?

Recommendation: Establish a new set of completion criteria that support the notion of a level playing field, including: 1) degree attainment (AA, AS, & bachelor’s); 2) retention, including traditional measure of fall to fall and fall to spring; 3) retention in good

standing, including graduation, transfer to another institution prior to completion and retained in good standing; 4) remedial program and ESL success; 5) Gateway course completion; 6) occupational certification; 7) workforce credit, including obtaining employment in a field of study, earning higher wages; effective tracking is essential, possibly via state and national employment, military and educational databases.

Other topics for Negotiated Rulemaking

Definition of a credit hour

The following is applicable to both Pell Grant eligibility and just as importantly, acceptance of transfer credits by one institution from another.

Recommendation: *Regional accreditation and all that implies with regard to faculty quality, student support initiatives (for both online and place bound institutions), full-time/part-time faculty ratios and additional acknowledged criteria should stand as the foundation for defining credit hours for Pell eligibility and acceptance of transfer credits by one institution from another institution.*

Verification of information for student aid applications

This can be a cumbersome responsibility for institutions, for which remedies are available in existing databases.

Recommendation: *Develop tie-in with IRS and Social Security databases to provide verification information. If discrepancies are apparent between submitted information and these databases, a personal interview with the student and further exploration can be initiated.*

Note: *Previous documentation has been forwarded to Secretary Duncan and Undersecretary Kanter regarding The Benefit Bank, a comprehensive platform that integrates numerous state and federal benefits, with a tie-in to the FAFSA.*