On April 24, 2018, the New England Association for Schools and Colleges (NEASC) sent a letter to President Ojakian and the Board of Regents stating that the Substantive Change Request submitted by CSCU to consolidate Connecticut's 12 community colleges into a single institution was not approved.

NEASC argued that the plan was "not realistic" and "that the potential for a disorderly environment was too high." The CSU Faculty Leadership Group agrees with NEASC's determination of the problems with "Students First."

- We believe that the changes in the "Students First" plan would be massively disruptive for more than 50,000 students and thousands of staff and faculty. It, and the uncertainty surrounding it, already has led to the demoralization of employees throughout the system and has negatively affected the ability of institutions to function optimally.
- The plan underestimates the difficulty of creating a common catalog (which requires 760 programs to be consolidated and nearly every course description be rewritten) and a common General Education program, both of which are necessary if one community college is to result.
- The plan does not guarantee that the quality of the education will be maintained with centralization and uniformity. The plan neither makes any provision nor sets any expectation that the program consolidations be based on determinations of the quality of programs.
- The plan's centralization will make the institutions and system, as a whole, less able to respond rapidly to unique local needs, to changing economic conditions and student interests, or to changes in academic fields.
- The plan will not save enough money to be worth the disruption and potential problems. Many university systems have found that a move to similar centralized structures overestimated savings and underestimated costs. NEASC similarly concluded that the plan did not allocate sufficient resources to maintain a functional administration, nor did it provide sufficient resources for planning and evaluation.
- The plan strengthens an already inefficient and expensive state bureaucracy that is run by people without higher education experience.

We are disappointed that Ojakian has broken his promise to respect NEASC.

Before submitting his "Students First" plan to NEASC, President Ojakian said he would respect their expertise and would not pursue a plan that would endanger the accreditation of the community colleges. Yet, when NEASC rejected the substantive change request, Ojakian accused them of being politically motivated and said that he would go ahead with his plan despite their misgivings. We are deeply concerned that the continuing pursuit of the community college consolidation has little chance of success, will continue to waste time, money, and attention, and will further risk the accreditations of the community colleges.

The rejection of "Students First" is the latest in a series of failures since Connecticut's Higher Education governance structure was changed in 2011.

In 2011, three systems were merged into one centralized system. The 4 state universities, 12 community colleges, and the online school Charter Oak were combined into the CSCU system. This merger has had negative consequences.

• There has been a revolving door of presidents -- 4 in less than 8 years.

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- The System Office has consistently sought to extend its authority and control into the day-to-day operations of the local institutions.
- The System Office is expensive; operating costs on average are \$35 million per year since 2011, adding up to over ¼ of a billion dollars in total (\$280,000,000). It also has spent roughly \$10 million on contracts with outside companies because of its lack of expertise in higher education and lack of faith in its own employees.
- None of the initiatives of the previous BOR presidents has achieved significant success. The only positive achievement was the Transfer and Articulation Policy (TAP), which was done on local campuses with the support of faculty and staff, not by system office personnel.
- Since its inception, the Board of Regents assumed the model of a controlling board, rather than
 a coordinating board, as was the case under the previous system.¹ Rather than coordinating
 policy and developing long-term plans for the entire state, the new BOR has taken decision
 making power over day-to-day operations away from the institutions and put it into their own
 hands.
- Further, the BOR is largely structured to be in the service of the system office, rather than to the institutions and the Presidents of the campuses. Although the BOR hires the Presidents of the colleges and universities, it plays no role in evaluating their performance, or even engaging in dialog about the life of the campus.
- "Students First" is just the most recent example of the undue deference given to the system office at the expense of the colleges and universities. Faculty, staff, presidents, administrators, and foundation boards were not adequately consulted about "Students First" when it was designed. The consolidation plan itself was written in haste and in secret by a small cadre of state bureaucrats, with no opportunity for public review, comment, or deliberation.
- We believe NEASC's rejection of "Students First" ought to give the Board pause to consider and reconsider its role in relation to both the system office and the colleges and universities.

We have in the past, and continue to, recommend alternatives to "Students First."

1.) Return to a previous governing structure.

We recommend following higher education systems in states like Oregon and Virginia that, in the face of reduced state funding, have moved in the direction of a reduction in outside financial and administrative controls.² We can do this by returning to a coordinating model of governance as existed before 2011.

- Individual institutions will be responsible for their own management, while the BOR is
 responsible only for the strategic direction and policies for the system as a whole, and
 interaction with the state and federal government.
- Controlling boards, like our current BOR, are problematic because they tend to evolve into large bureaucracies that are "slow to respond to institution and public needs," get "mired in hands-on management," and are "too focused on micro-level, institutional issues to devote attention to statewide planning."³
- Coordinating boards are preferable because they accept that "decisions are best made at a level that is the closest to where they impact operations."⁴ They also give institutions sufficient

¹ Legislative Program Review & Investigations Committee, Connecticut General Assembly, "Higher Education Governance Structure, Findings and Recommendations," December 16, 2010, 7.

² James A. Hyatt, "Restructuring Public Higher Education Governance to Succeed in a Highly Competitive Environment" (UC Berkeley: Berkeley Center for Studies in Higher Education, June 1, 2015), 8,

³ Legislative Program Review, 16 & 17.

⁴ Hyatt, 9.

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autonomy to be flexible and to respond quickly to the changing needs of their communities and students, to partner with the private sector, and to empower "local action and innovation."⁵

2.) Look for savings at the system office.

- Reduce managers with high salaries.
- Return administrative functions and staff to campuses.
- Avoid outside contracts or outsourcing of work.

3.) Look for savings through a regional consortia model.

- We agree with the TIAA Institute conclusion that mergers are unnecessary, and that "consortia have achieved economies of scope and scale through shared provision of a broad range of academic and student service-oriented programs, resources and experiences."⁶
- Connecticut has different regions, so a consortia of each four-year university with the community colleges within the same region might be most effective.

4.) Actively pursue investment by the state at same time.

Savings are not enough. The legislature must make a commitment to invest in higher education to ensure the well-being of individual residents, to promote the economic competitiveness of the state, and to develop the cultural and civic vibrancy of the state. Everyone agrees that Connecticut needs an educated workforce and citizenry.

CSU Faculty Leadership Group

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⁵ Hyatt, 6.

⁶ Michael K. Thomas, "Between Collaboration and Merger: Expanding Alliance Strategies in Higher Education" (TIAA Institute, November 2015), 5.