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November 27, 2017

Eloy Ortiz Oakley
Chancellor
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This letter is in response to your proposed initiative, called “Flex Learning Options for Workers” or Project FLOW ([link](#)) which is designed to meet Governor Brown’s request to create a fully online community college ([letter attached](#)). My comments are based on the FLOW draft which has three options as described in the [attached PowerPoint](#). They are:

- Option #1. FLOW unit with statewide mission within an existing campus
- Option #2. FLOW consortium of colleges hosted by an existing district
- Option #3. New FLOW district, operating under the CCCCCO and fully competency-based

Chancellor Oakley, you stated that the “target audience” for the fully online college is, “Adults with high school credential or some college and no certification-compatible with working and vocational needs” and the purpose is “To enable them to earn certifications that lead to better workforce outcomes.” Voices around our system, mine included ([see KPCC story—attached](#)), are skeptical that online vocational training for students who may not be college ready will produce the desired level of graduates. To that point, please review a summary ([attached](#)) of the recent Educause educational technology survey completed by 35,760 students who take online classes and 11,141 faculty who teach them. Some results that question the efficacy of a fully online college:

- 79% of students prefer hybrid offerings whereas fully online courses are preferred by only 6%.
- 49% of faculty do not agree that online learning is effective.
- Students want more lecture capture technology and early alert notification and less social media utilization.
- Faculty want clear evidence of online class benefits (37%) and release time for course design/redesign (34%).

Some of the elements in the design of the FLOW options have raised concerns as well.

- In Option #1, the existing college with the FLOW system would employ or contract with “instructional designers” who would “apply FLOW design criteria.” Concerns have been expressed about contracting out faculty work.
- Also in Option #1, the “hosting district” would provide student support with campus staff and “partners” plus providing “extended hours and alternative modes of delivery.” To have a single college expand its mission to serve tens of thousands of online students would take an unworkable number more campus staff to locate on a single campus. What would be the reaction of other colleges to siphoning off their local students taking online classes?
- In Option #1 as well, the mysterious “partner” reference needs clarification. To many, myself included, this option seems unnecessary given the multi-million dollar ongoing state investment in the

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Online Education Initiative ([link](#)) and the corresponding Online Course Exchange ([link](#)) that allows students at a participating college to take for credit any online course offered by another participating community college—with articulation back to the host college.

- In Option #2, “The collaborating colleges would all invest in the College Owners Association (COA). COA creates its own scope and mission.” Actually, such an association already exists; it is called the OEI Consortium ([link](#)). See also the FAQ ([link](#)). Colleges sign an agreement to adhere to the standards ([link](#)). In fact, the OEI Consortium is expanding ([link](#)), and a letter of interest ([attached](#)) was just sent to community colleges statewide.
- Also in Option #2, “District/COA would provide program oversight” and “Chancellor’s office would review activities to assure FLOW model adherence.” Having the COA do “program oversight” and the Chancellor’s Office “review activities” gives a level of centralized control that is currently not in state law and is problematic in complying with Education Code 70902(b)(7), “...ensure the right of academic senates to assume primary responsibility for making recommendations in the areas of curriculum and academic standards.”
- Option #3, calls for a new, autonomous, statewide California Community College district created by the state Chancellor’s Office under the oversight of the Board of Governors who would hire the CEO. As a state agency, the Chancellor’s Office is not eligible to receive Proposition 98 funds. A fully online college that operated with contract employees delivering instruction may find accreditation difficult to attain. A similar institution, Western Governors University, was found by a recent federal audit ([link](#)) to be a correspondence school and its students not eligible for federal financial aid. There may be constitutional issues under Article IX of the California Constitution related to formation of such a district, its boundaries, and election of its governing board members.

The goal of Governor Brown’s letter was “for our community colleges to increase even further the availability of online courses and degree programs -- and make college far more accessible and affordable.” While the governor asked the Chancellor “to establish a new community college that -- exclusively -- offers fully online degree programs,” a strong case can be made that the governor’s goal of accessible and available online courses and degrees can be achieved by taking the next leap forward with online education technology. I have already mentioned the Online Education Initiative and the companion Online Course Exchange. In addition, emerging initiatives such as Project Glue ([link](#)) and Data Governance ([link](#)) are being discussed in the system’s Telecommunication and Technology Advisory Committee—TTAC ([link1](#), [link2](#)). It has been my honor to be involved with TTAC from its inception in 1996 through most of its existence as the creative and operational nexus of California Community College innovation in educational technology. Extension of this established, successful, and collaborative work is the most effective and practical solution to Governor Brown’s challenge to expand the use of technology to improve student accessibility and affordability of our courses and program. Please consider this option.

Sincerely,



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