FCMAT

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM

San Diego Community College District

Review of Continuing Education Noncredit Program

January 31, 2020

Michael H. Fine
Chief Executive Officer

FCMAT

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January 31, 2020

Bonnie Ann Dowd, Ed.D, MBA, CMA
San Diego Community College District
3375 Camino del Rio South
San Diego, CA 92108

Dear Executive Vice Chancellor Dowd:

In June 2019, the San Diego Community College District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement to provide a review of the district's noncredit program. Specifically, the agreement states that FCMAT will perform the following:

1. Provide fiscal management assistance for an independent review of the district's noncredit program at San Diego Continuing Education (SDCE) and its five educational centers and make recommendations for fiscal efficiencies, if any.

This final report contains the study team's findings and recommendations in the above area of reiew.

FCMAT appreciates the opportunity to serve you and extends thanks to all the staff of the San Diego Community College District for their cooperation and assistance during fieldwork.

Sincerely,

Michael H. Fine
Chief Executive Officer

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About FCMAT

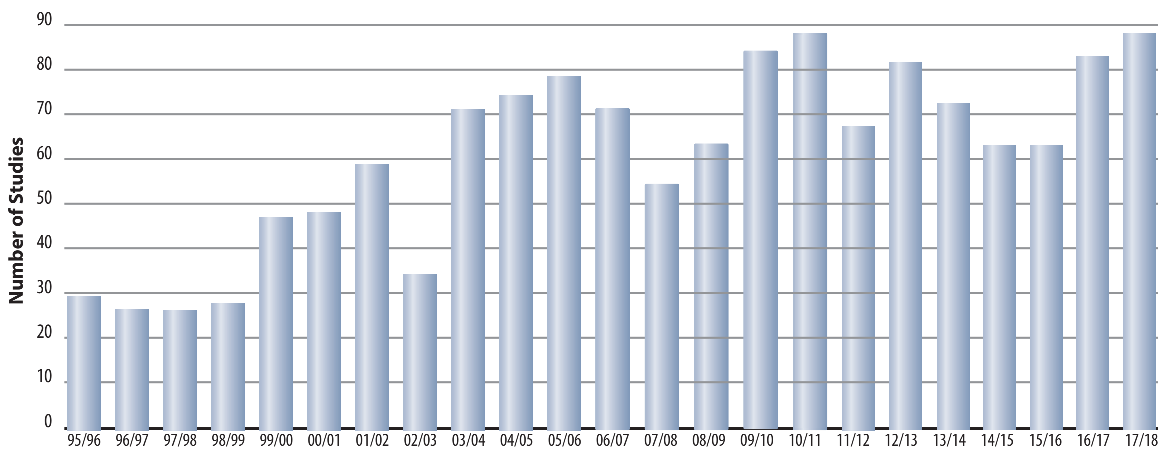
FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related school business and data services. FCMAT's fiscal and management assistance services are used not just to help avert fiscal crisis, but to promote sound financial practices, support the training and development of chief business officials and help to create efficient organizational operations. FCMAT's data management services are used to help local educational agencies (LEAs) meet state reporting responsibilities, improve data quality, and inform instructional program decisions.

FCMAT may be requested to provide fiscal crisis or management assistance by a school district, charter school, community college, county office of education, the state Superintendent of Public Instruction, or the Legislature.

When a request or assignment is received, FCMAT assembles a study team that works closely with the LEA to define the scope of work, conduct on-site fieldwork and provide a written report with findings and recommendations to help resolve issues, overcome challenges and plan for the future.

FCMAT has continued to make adjustments in the types of support provided based on the changing dynamics of K-14 LEAs and the implementation of major educational reforms.

Studies by Fiscal Year



FCMAT also develops and provides numerous publications, software tools, workshops and professional development opportunities to help LEAs operate more effectively and fulfill their fiscal oversight and data management responsibilities. The California School Information Services (CSIS) division of FCMAT assists the California Department of Education with the implementation of the California Longitudinal Pupil Achievement Data System (CALPADS). CSIS also hosts and maintains the Ed-Data website (www.ed-data.org) and provides technical expertise to the Ed-Data partnership: the California Department of Education, EdSource and FCMAT.

FCMAT was created by Assembly Bill (AB) 1200 in 1992 to assist LEAs to meet and sustain their financial obligations. AB 107 in 1997 charged FCMAT with responsibility for CSIS and its statewide data management work. AB 1115 in 1999 codified CSIS' mission.

AB 1200 is also a statewide plan for county offices of education and school districts to work together locally to improve fiscal procedures and accountability standards. AB 2756 (2004) provides specific responsibilities to FCMAT with regard to districts that have received emergency state loans.

In January 2006, Senate Bill 430 (charter schools) and AB 1366 (community colleges) became law and expanded FCMAT's services to those types of LEAs.

On September 17, 2018 AB 1840 was signed into law. This legislation changed how fiscally insolvent districts are administered once an emergency appropriation has been made, shifting the former state-centric system to be more consistent with the principles of local control, and providing new responsibilities to FCMAT associated with the process.

Since 1992, FCMAT has been engaged to perform more than 1,000 reviews for LEAs, including school districts, county offices of education, charter schools and community colleges. The Kern County Superintendent of Schools is the administrative agent for FCMAT. The team is led by Michael H. Fine, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

Introduction

Background

San Diego Continuing Education (SDCE) is the adult education division of the San Diego Community College District (San Diego CCD) and is the largest provider of noncredit education in California. SDCE was one of the first continuing education institutions in California to meet the standards for independent accreditation from the Western Association of Schools and Colleges, and leads the state in many areas of noncredit, including awarding more certificates of completion than any other noncredit organization in the state. The program also leads the state in noncredit career training options available for adult students, many of whom are among the most diverse in California culturally, ethnically, and educationally. Nearly 45,000 full-time equivalent students (FTES) are served per academic year at San Diego CCD, with approximately 7,500 FTES in SDCE. Noncredit classes are available at no cost, including online options.

In June 2019 the San Diego CCD requested that FCMAT assist the district by reviewing the district's noncredit program.

Study and Report Guidelines

FCMAT visited the district July 24 through 26, 2019 to conduct interviews, collect data and review documents. Following fieldwork, FCMAT continued to review and analyze documents. This report is the result of those activities and is divided into the following sections:

- Executive Summary
- Administrative Structure
- Full-Time Faculty
- Minimum Average Class Size
- Faculty Scheduling
- Hours for Classes and Curriculum Approval Procedures
- Use of Adjuncts and Substitutes
- Specialty Classes at Multiple Sites
- Contract Anomalies
- Appendices

FCMAT's reports focus on systems and processes that may need improvement. Those that may be functioning well are generally not commented on in FCMAT's reports. In writing its reports, FCMAT uses the Associated Press Stylebook, a comprehensive guide to usage and accepted style that emphasizes conciseness and clarity. In addition, this guide emphasizes plain language, discourages the use of jargon and capitalizes relatively few terms.

Study Team

The study team was composed of the following members:

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*As members of this study team, these consultants were not representing their respective employers but were working solely as independent contractors for FCMAT.

Each team member reviewed the draft report to confirm accuracy and achieve consensus on the final recommendations.

Executive Summary

Noncredit or adult education programs include various segments of higher education and are generally designated as extension, extended-day, part-time, adult, evening classes, or continuing education. The California Community Colleges Chancellor's Office Program and Course Approval Handbook, 6th Edition, states that noncredit instruction in the California community colleges is an important contributor to open access for students with diverse backgrounds and is one of several educational options offered in the system.

Noncredit instruction offers students access to a variety of low and no cost courses, and often serves as a first point of entry for those who are underserved, as well as a transition point to prepare students for credit instruction and the workforce. The benefits of noncredit curriculum for California community college students include that noncredit courses:

- Are free and provide options for students who do not qualify for financial aid.
- Focus on skill attainment, not grades or units.
- Are repeatable and not affected by the 30 unit basic skills limitation.
- Can provide flexible scheduling and can be open entry/open exit for students who are working and managing college at the same time.
- Are accessible to nearly all students and serve as elementary level skill building courses leading to pre-collegiate curriculum.
- Can serve as a bridge to other educational/career pathways.
- Provide preparation, practice, and certification in career and technical education.
- May be a point of entry into college-level courses for students who are not yet ready to enroll in a credit program.

The combined numbers of administrators, deans, faculty program chairs, assistant program chairs, and program coordinators at SDCE are excessive compared to the industry standard for efficient management of similar size programs. Many faculty have significant release time, raising concerns that the noncredit program cannot sustain such a heavy ongoing administrative expense, especially in light of declining enrollment. Over the last 10 years, noncredit has seen significant variation in enrollment, but projections reflect declines over the next few years.

San Diego CCD's current faculty obligation number (FON), which is calculated using full-time credit faculty, is 564.0. The district exceeds that amount by 43.3. In addition to this overage, the noncredit program employs an additional 135 full-time faculty, an expensive way to staff compared to similar programs statewide. While full-time faculty provide leadership in curriculum and pedagogical advancements, the high number of noncredit full-time faculty exceeding the FON represents an annual estimated cost of $10,403,505 above the requirement.

Inefficient practices such as small class sizes, specialty classes at multiple sites, excessive use of adjuncts and substitutes, classes scheduled based on faculty preference, criteria lacking for the number of hours assigned to courses, and the lack of a clear distinction between lab and lecture hours result in excessive costs to the district.

The district's negotiated pay rate for continuing education faculty as well as other contractual provisions have led to higher than usual costs for noncredit instruction. Most notably, the district agreed to pay noncredit faculty the same hourly rate as credit faculty effective January 1, 2015, a practice not found elsewhere in California. The higher hourly rate, in addition to the higher number of hours (25 vs. 15) needed to comprise a full-time equivalent faculty (FTEF), exacerbates the cost of this noncredit program.

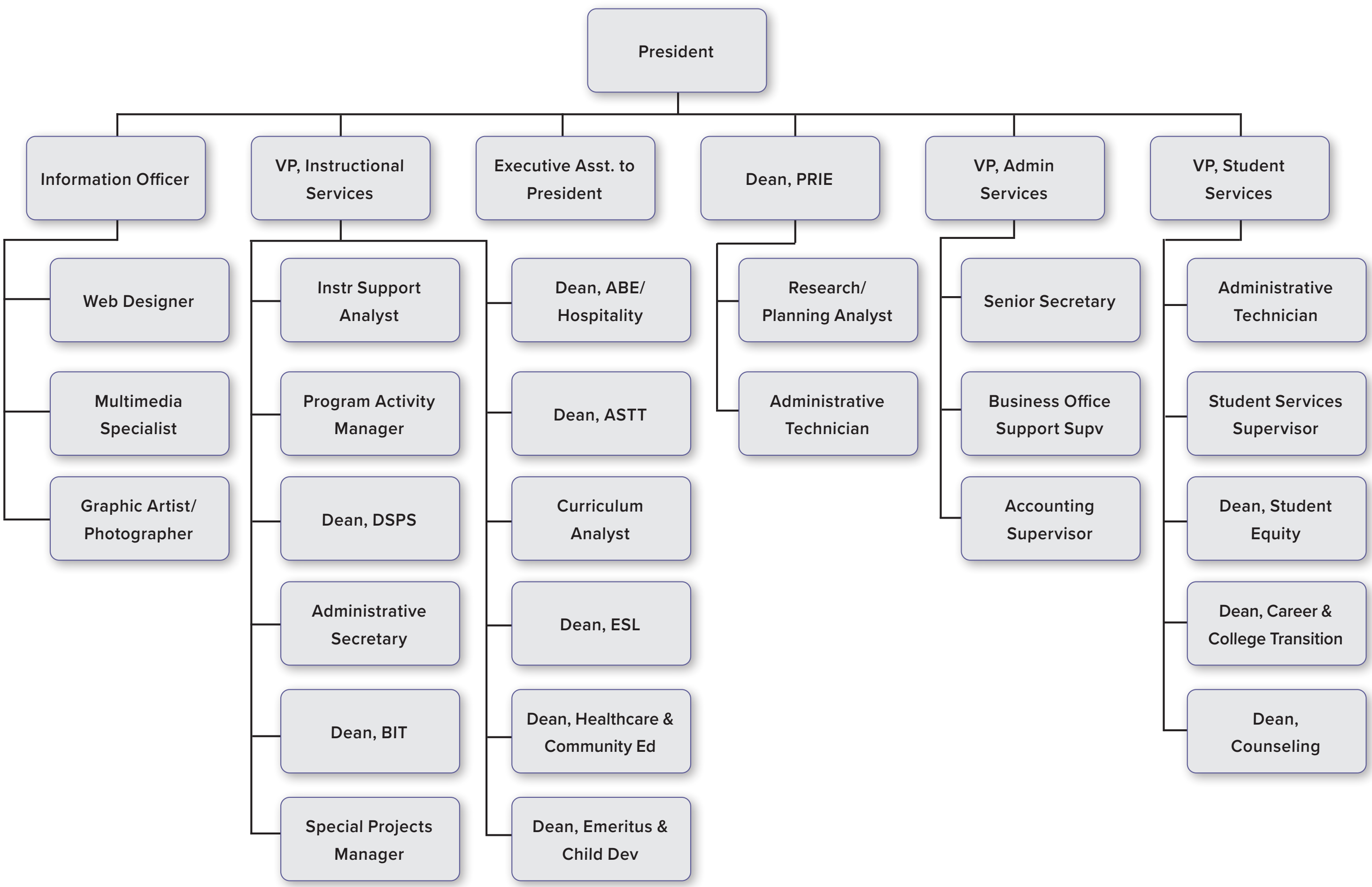
San Diego CCD's Priority of Assignment (POA) criteria contained in the collective bargaining agreement makes it difficult to reduce the load for current POA faculty. The most restrictive provision requires that POA faculty receive a load equal to their average load over the last two semesters, resulting in almost a guarantee that they will maintain their FTEF. Combined with the high number of full-time faculty who must be given 100% load, this clause seriously limits the ability of continuing education to reduce the number of scheduled classes or change the composition of its course offerings since POA faculty attach to specific disciplines. These and other contract obligations taken together result in POA faculty essentially having permanent positions of up to 67% load.

Class scheduling practices basically give student needs a lower priority than the preferences of both full-time and adjunct faculty based on their completed preference forms that indicate what, when and where they would like to teach.

Findings and Recommendations

Administrative Structure

The Continuing Education (CE or noncredit) program at San Diego CCD serves approximately 7,500 full-time equivalent students (FTES) per the 2018-19 Principal Apportionment Report issued by the Chancellor's Office. It is not designated as a college within the district, although the noncredit program is led by a president and supported by three vice-presidents and 11 deans. Eight of the deans are funded by general fund, three by categorical funds. Noncredit provides instruction at seven primary sites; each site has an instructional dean who serves as an area of study expert (e.g., English as a second language or health care) and as site supervisor.



During meetings with district and college leadership, the noncredit administrative structure was described as similar to designs found in both college and high school systems. It is typical for a college to assign deans an area of specialization, such as humanities and social sciences, arts, or math and science, allowing the deans to establish strong working relationships with discipline faculty and develop an in-depth understanding of each discipline's scheduling needs. This promotes good schedule development practices that meet the needs of students and faculty and maximize productivity. In the public high school sector, principals are typically assigned to a single school and serve as site supervisors responsible for facility maintenance, interaction with parents, development of the master instructional schedule, supervision of staff, instructional leadership, and interaction with district leaders. At the college level, deans do not normally serve as site supervisors. While they typically manage buildings or rooms where most of their faculty have offices, classes are scheduled, and programs are housed, they are not the sole support for that building or site. At San Diego CCD noncredit, instructional deans also are asked to serve as site supervisors, with limited support from centralized district functions.

Of the 11 deans, eight are instructional deans and three are student services deans, each with a specific assignment (college and career transition, counseling, and student equity) and a dean of planning and research. Growth in student services has been supported by categorical funds. While each individual college's student services program is unique, given the size of the noncredit population and based on industry standards, effective programs could be maintained with fewer deans. This would release more dollars for direct service to students. The FTES generated do not support the current number of academic and student services administrators.

During on-site interviews, many individuals commented on the expansion of the administrative ranks, concerned that the program could not sustain an administrative expense this large over time, especially in light of declining enrollment in noncredit. Over the last 10 years noncredit enrollment has varied significantly, but the trend remains on a downward slope and interviews confirmed projected continued decline in enrollment over the next few years.

*FTES reported for all San Diego CCD noncredit centers**

Year	FTES
2010-11	9,040.84
2011-12	8,163.61
2012-13	8,101.03
2013-14	8,091.53
2014-15	8,467.16
2015-16	8,285.59
2016-17	8,517.82
2017-18	8,104.60
2018-19	7,498.64

Source: San Diego Community College District

*Includes the flexible time adjustment (F) factor for courses offered under a flexible calendar.

In 2015-16, San Diego CCD noncredit reported a total of 13.3 educational and classified managers. The organizational chart provided by the district dated August 1, 2019 identifies 18 educational and classified managers, an increase of 35%. The large number of faculty with significant release time reinforces the concern that the administrative and faculty leadership structure is oversized. Eleven program chairs lead their discipline's work in curriculum and schedule development. Several program chairs at multiple campuses have assistant program chairs with release time. Faculty also have release time for program coordinator assignments. While the faculty contract gives general guidelines for determining release time based on program FTES, it appears the practice has been to go beyond the contract recommendations and add release time for assistant chairs whenever a program is added at a new site. This practice has resulted in inflated release time assignments rather than the development of good practices that create strong lines of communication among program chairs, deans, and faculty at multiple sites.

Given the relatively low number of FTES generated by each site, the number of individuals required to develop schedules and manage the sites appears excessive. The combined numbers of deans, faculty program chairs, assistant program chairs, and program coordinators are excessive compared to the industry standard for efficient management of a program this size. Leadership work can be streamlined by increased communication between instructional sites. If the number of deans is reduced, classified site supervisors can handle specific needs of the facilities, releasing deans to focus on instructional issues. It is typical for a single dean and program (department) chairs to develop and plan schedules for divisions of up to 6,000 FTES. The dean's assignment usually also includes special/unique programs, such as tutoring centers or open labs, all requiring devoted attention. Program chairs communicate with faculty regardless of assignment location or time of day. There is no need for site-specific assistant chairs if the dean and program chairs develop effective planning protocols and communication tools.

The chart below lists the academic administrators assigned to similar sized noncredit programs throughout the state for comparison purposes.

Administrative positions at similar sized noncredit programs

College	FTES	Academic Administrators
Mt. San Antonio College School of Continuing Education	7,872.97	1 Associate Vice President of Instruction 1 Academic Dean 1 Associate Dean
San Diego Noncredit	7,540.28*	1 President 3 Vice Presidents 11 Deans
North Orange Continuing Education	5,105.88	1 Provost 3 Academic Deans

Source: 2018-19 Second Principal Apportionment (P2), Exhibit C, cccco.edu

* Includes approximately 30 noncredit FTES being earned at the colleges for tutoring.

San Diego FTES by campus

San Diego CCD Noncredit Center	FTES*
Cesar E. Chavez Campus	1,061.72
Educational Cultural Center	1,497.76
Mid-City Campus	1,590.53
North City Campus	2,231.29
West City Campus	968.39
Total	7,349.69

Source: 2018-19 Apportionment Attendance Report, period: annual, cccco.edu

* FTES are unfactored.

Mt. San Antonio College (Mt. SAC) School of Continuing Education, a similar continuing education program of approximately 7,800 FTES, is managed by one associate vice president, one dean and one associate dean, with program coordinators, some faculty and some classified, in the largest programs. Programs and courses are at one primary site and multiple smaller sites throughout the community. North Orange Continuing Education is managed by a provost and three academic deans. The largest site is in Anaheim, with courses also taught on the two credit college campuses and at multiple community sites. Neither Mt. SAC nor North Orange has a student services manager at the dean level, yet similar services are provided for students.

During multiple interviews, staff commented that no clear criteria exists for adding management positions. Approvals are ultimately the chancellor's purview; however, some positions come to cabinet for review while others move directly to the chancellor. This prevents comprehensive analysis by all members of cabinet of the relative need, existing campus support structure, ability of the district to provide the requested service or support, determination of the most appropriate funding source (general fund or categorical), and related implications.

Recommendations

The district/SDCE should:

1. Reduce the administrative staffing in Continuing Education.
2. Reduce the amount of release time provided to faculty for program leadership.
3. Require deans and program chairs to collaborate in schedule development based on student demand.
4. Develop a student-centered schedule.
5. Offer classes to full-time and adjunct faculty in compliance with the contract.
6. Develop communication tools that support deans' and program chairs' connection with faculty teaching at centers other than the chair's assigned location.
7. Increase coordination among sites to maintain current level of faculty engagement.
8. Develop policy and procedure for adding new management positions, including a template for analysis of fiscal impact.

Full-Time Faculty

San Diego CCD noncredit includes 135 full-time faculty, far exceeding the full-time faculty numbers at similar sized noncredit programs. By comparison, Mt. SAC has six full-time faculty and eight full-time counselors, serving a student population of nearly 7,800 FTES. Full-time faculty typically have program coordination and curriculum responsibilities and a small classroom assignment.

The practice of hiring full-time faculty for assignments in noncredit raises multiple concerns. First, one of the major strengths of noncredit programs is the ability to rapidly make structural and curricular changes to meet new and emerging student needs. These may include changes in schedule (e.g., day, night, weekend, online) or emerging areas of study requiring new and different faculty expertise. Commitment to tenured, full-time faculty limits program development and flexibility. In addition, the practice of building a schedule based on faculty choice rather than student interest and the time they are available to attend typically results in smaller class size.

The need to provide load to full-time faculty further inhibits management from cancelling low enrollment courses. Courses run with minimum rather than maximum enrollments. In 2016-17, San Diego CCD noncredit reported 6,403.46 enhanced Career Development and College Preparation (CDCP) FTES in 3,819 course sections, with an average per section of 1.6 FTES. North Orange reported 2,665.69 CDCP FTES in 867 course sections, with an average per section of 3.0 FTES. Mt. SAC reported 5,095.1 CDCP FTES and 1,268 course sections, with an average per section of 4.0 FTES. This difference translates to significantly higher instructional program costs and highlights one cost of full-time faculty.

District	2016-17 Enhanced Noncredit FTES	Number of Course Sections	FTES Average/ Section
San Diego	6,532.02	3,819	1.7
Mt. SAC	5,095.10	1,268	4.0
N. Orange	2.665.69	867	3.1

Every California community college district has a full-time Faculty Obligations Number (FON) determined and assigned by the Chancellor's Office. While the source and calculation of the final number is often controversial, all community colleges are required to maintain the published number of full-time faculty. Failure to maintain the district's FON results in a fine. In fall 2018 the fine was $77,063 per missing position. This is equal to the replacement cost for a faculty member. The calculated average cost is the difference between the cost of an adjunct and a full-time faculty member.

When a district determines whether or not it has met the FON, only credit faculty are included in the calculation. Faculty teaching full-time in noncredit programs are not included in the district's numbers. This means that when districts decide to hire full-time noncredit faculty, they do not receive state funding to support these hires.

The San Diego CCD's current FON is 564.0 and the total number of full-time credit faculty equals 607.3, an overage of 43.3. This means the district employs 43.3 more full-time credit faculty than required. While most districts maintain their full-time faculty numbers slightly above the FON, to avoid the chance of penalty, few can sustain a large overage. Using the state's calculations, if the replacement cost is $77,063 and San Diego CCD is over by 43.3 that represents an expenditure of approximately $3,336,827.90. In addition to this overage in credit faculty, an additional 135 full-time faculty are employed in noncredit. Using the state average salary, this represents a cost of $10,403,505. While full-time faculty provide leadership in curriculum and pedagogical advancements, the high number of full-time noncredit faculty is costly to the district. Similar large districts do not employ full-time faculty numbers above the FON, other than minimal amounts to avoid the chance of a penalty being charged.

Recommendations

The district/SDCE should:

1. Reduce the number of full-time faculty teaching in the noncredit program.
2. Develop a robust pool of adjunct faculty able to teach current and emerging curriculum on a schedule that maximizes student access.
3. Create a protocol for the deans to lead class schedule development in a manner that is grounded in student need.
4. Maximize student access and program flexibility to increase productivity.

Minimum Average Class Size

The San Diego CCD noncredit program should publish and adhere to clear guidelines regarding minimum class size to increase class productivity. During interviews, both administrators and faculty expressed a lack of clarity about guidelines. A June 2018 communication from the vice president to CE deans was provided to FCMAT that stated the minimum average class size (ACS) had been increased to 26. In addition, the need to increase class productivity was highlighted during the Instructional Day and Convocation in 2017-18.

The SDCE faculty handbook references ACS with the following guidelines should a class fall below an ACS of 26:

- If 18 to 25 students at any session, the class may continue with program dean approval.
- If 15-17 students at any session, meet the full class hours on that day but inform students that future class sessions may be cancelled. Program dean approval is required to continue holding class with an ACS of 15-17 students.
- If 14 or less, meet the full class hours and notify program dean. Again, inform students that future class sessions may be cancelled. Program dean approval is required to continue holding class with an ACS of 14 students or less.

Although leadership indicated they have consistently evaluated ACS and made decisions to determine if a lower ACS class should remain open, that evaluation and discussion does not appear to be communicated among faculty.

Deans noted in interviews a lack of information about whether the minimum was in force as well as criteria to use when deciding to cancel a class. In addition, the information system does not provide timely and accurate class size data at the start of the term. FCMAT was also told that in classes with a high number of hours, students often skip or drop the class more frequently, meaning that the class must start with a higher number of students to remain fiscally viable until the end of the term. Staff reported that classes with a higher number of hours are sometimes allowed to run with fewer students, which can result in cost overruns since the faculty member is still paid for the total hours despite fewer students generating FTES. Contract provision 5.3.1 restricts the ability to cancel low-enrollment classes, stating that no CE class can be cancelled while the instructor is on sick leave and must continue for at least two weeks or five class sessions after the instructor returns.

Because noncredit classes are not funded using census data, but rather by actual weekly student contact hours (WSCHs), FTES change as the course progresses. A historical analysis of WSCH is needed for each section or for each course because of variances each year to better understand overall trends, especially at the start of each class, the halfway point and at its conclusion.

Recommendations

The district/SDCE should:

1. Determine a minimum class size based on expected instructor costs and apportionment.
2. Institute a written process by which deans are informed about and accountable for minimum class sizes.
3. Conduct a historical analysis of WSCH for each section or for each course for the past five years.

Faculty Scheduling

Adult noncredit education as part of the community colleges is included as a secondary mission to its primary mission of academic and vocational instruction. According to Education Code Section 66010.4, “The provision of remedial instruction for those in need of it and, in conjunction with the school districts, instruction in English as a second language, adult noncredit instruction, and support services which help students succeed at the postsecondary level are reaffirmed and supported as essential and important functions of the community colleges.”

While the provision of adult noncredit education curricula in areas defined as being in the state’s interest is an essential and important function of the community colleges, it is also true that the provision of these courses and programs must be compatible with an institution’s ability to meet its obligations in its primary missions. It is critical for San Diego CCD noncredit to schedule based on student needs and other data indicating that students will attend or benefit from a class, rather than scheduling based on faculty preference and load needs.

Interviews found that the scheduling process starts with both full-time and adjunct faculty filling out preference forms, which indicate what they would like to teach, when and where. College administration stated that the forms are only taken into consideration to assign courses after the class schedule is prepared. To change the perception that faculty preference is taken into consideration and thus affects how classes are scheduled, thereby placing student needs as a lower priority, FCMAT is recommending that the forms not be completed until after the schedule is set. Administrators noted that it can be challenging to build a student-based schedule when so many full-time faculty need to have full loads. The district also negotiated a generous POA policy for adjuncts that leads to many adjuncts receiving maximum loads each term regardless of student interest. Deans also reported that “rolling” the schedule without changes from one term to the next is a common practice.

Recommendations

The district/SDCE should:

1. Request that staff complete preference forms after initial schedules are set.
2. Reduce the number of full-time faculty in areas of low student interest through attrition or other method.
3. Renegotiate POA provisions to avoid scheduling classes to maximize loads.

Hours for Classes and Curriculum Approval Procedures

Noncredit courses are classified into legislated instructional areas and curriculum is governed by the state Education Code and the California Code of Regulations. The placement of a course in a given instructional area is driven by the course objectives and the target population. To be eligible for funding, the noncredit courses must be approved pursuant to Title 5, Sections 55002, Standards and Criteria for Courses, and 55150, Approval of Noncredit Courses and Programs, and must fall into one of the nine noncredit instructional categories eligible for state apportionment, which include:

1. English as a second language (eligible for CDCP-enhanced funding, in accordance with Education Code 84760.5 and CCR Title 5, Section 55151)
2. Immigrant education (which includes citizenship and workforce preparation) (CDCP courses)
3. Elementary and secondary basic skills (eligible for CDCP enhanced funding, in accordance with Education Code 84760.5 and CCR Title 5, Section 55151)
4. Health and safety
5. Programs for adults with disabilities
6. Parenting
7. Home economics
8. Older adult programs (designed for residents over 55 years of age)
9. Short-term career technical education (eligible for CDCP enhanced funding, in accordance with Education Code 84760.5 and CCR Title 5 Section 55151)

Once approved by the Chancellor's Office, some CDCP courses are eligible for enhanced funding to increase student success and completion; specifically, those designed to prepare students for employment and to be successful in college level credit coursework. Senate Bill 361 (Scott/Chapter 631, Statutes 2006) authorized these enhanced funding courses, which have a higher rate of funding for contact hours and are beneficial to the college, as well as emphasizing the vocational training and college preparation aspects of noncredit programs overall.

Attendance reporting is required for the institution to calculate its apportionment. Attendance reporting is based on contact hours. Contact hours of enrollment in noncredit courses are based on the count of students present at each course meeting.

Title 5, Section 55002(c) outlines the basic standards and criteria needed for noncredit courses, which include, at a minimum:

- Recommended by the college and/or district curriculum committee
- Approved by the district governing board as a course meeting the needs of enrolled students

Once a course proposal is approved locally, it is sent to the Chancellor's Office for approval, which occurs within 60 days of submittal, although the time frame could take longer based on the total number of proposals received.

The SDCE has a catalog of several hundred courses that is stored electronically. A review of a number of courses shows that most have not been reviewed within the past five years and some seem duplicative of each other (e.g., ACCT 503 and ACCT 511 both prepare students for entry-level employment in accounting). FCMAT could not find any criteria for assigning a number of hours to courses nor for distinguishing between lab and lecture hours. Some courses simply identify the course hours as “lecture/lab.” At least one course identified 24 lecture hours and 576 lab hours. A number of courses are more than 200 hours, which is more than 10 hours a week in an 18-week semester, such as:

- ACCT 503: 216 hours
- AGRI 600: 100 lecture, 450 lab
- AUTO 414: 50 lecture, 200 lab
- ELRN 405: 227 lecture, 225 lab
- ESLA 421, 422 and 423: 270 hours each
- FDNT 680: 450 lecture/lab
- Welding courses: most are 600 hours

While hands-on career technical courses often require many lab hours, the number of hours identified in the course outline of record (COR) is often 450 (the equivalent of one FTEF) or some multiple of that number. Therefore, many full-time faculty will teach one or possibly two courses per semester. Credit courses in similar areas – such as economics, welding, and ESL – often comprise fewer hours than those identified as noncredit.

Administrative Procedure (AP) 5022, Course Approval, states that the district will rely primarily on the Academic Senate for all recommendations for new courses, changes or revision of courses, or other modifications of curriculum. These recommendations must be approved by the Curriculum and Instructional Council (CIC) prior to approval by the board of trustees and submission to the CCCCO as required.

AP 5020, Curriculum Development, states that an annual timeline for submission of new curriculum proposals and modifications is published prior to the start of each academic year. For noncredit curriculum proposals, faculty (contract and adjunct) may initiate curriculum proposals, and students; administrators; college, continuing education and district councils and committees; members of the board of trustees; and members of the community may suggest curriculum. Mandatory curriculum review shall occur by the tech review liaison at the originating college, the curriculum chair, and the CIC chair, with optional curriculum review by discipline faculty that offer a course in the subject area, the department chair that offers a course in the subject area, the appropriate dean at all colleges that offer a course in the subject area, and the vice president of instruction. The board of trustees shall review and approve new course proposals. The CCCCO is to approve new courses in accordance with the requirements in the current edition of the Program and Course Approval Handbook, as well as the appropriate accrediting agency. All courses shall be reviewed at least once every six years.

The noncredit curriculum approval process should be reviewed to ensure that there are checks on the number of hours added based on the content of the course. The process for new curriculum requires new courses to be approved by the SDCE Curriculum Committee, then the San Diego CCD Curriculum Instructional Council, before moving to the board of trustees and the CCCCO. By contrast, the process for course revisions only requires approval from the SDCE Curriculum Committee prior to submission to the Chancellor’s Office. Both flowcharts are in the appendix to this report and are dated 9/5/2018. The SDCE Curriculum Committee consists of the vice president of instruction for CE, one classified staff, and faculty appointed from the various CE areas. FCMAT was informed by administrators that courses in some areas were undergoing revision to add more hours. From documents provided to the team, it was not clear what criteria are used to determine course hours, whether courses are normed against similar CE or credit courses, and what role the deans and other administrators play in ensuring an appropriate number of hours is allocated to a course.

Recommendations

The district/SDCE should:

1. Establish criteria for the assignment of hours to course outlines while preserving faculty primacy over COR approval.

2. Compare the number of hours per course to comparable credit and noncredit courses in other districts.

3. Review the CE curriculum approval processes for both new courses and revised courses to ensure there are criteria and steps to assign an appropriate number of course hours to each COR.

Use of Adjuncts and Substitutes

Since at least 2013-14, SDCE has overspent its annual adjunct faculty budget by more than $1 million and its substitute budget by $100,000. At the same time, it has added more full-time faculty, equaling 135 in 2018-19. As a general industry rule, when a college adds full-time faculty, the adjunct budget should decrease. At SDCE, both have increased over the years even as FTES production has fallen.

Although substitute costs are a small part of the budget, SDCE has consistently spent up to 200% of its budget in this area. FCMAT was told that the process for providing substitutes entails a faculty member submitting a form and often identifying a sub; it was inconsistent at various CE sites and not clear that deans have a role in approving the sub request. Without a clear process and controls in place, it is likely that some sub requests are based on absences for reasons not approved in the collective bargaining agreement.

Recommendations

The district/SDCE should:

1. Ensure that annual adjunct and substitute faculty budgets are not overspent.
2. Examine why SDCE's full-time faculty as well as adjunct budgets are increasing.
3. Implement a process for substitute approval that ensures the provisions of the collective bargaining agreement are met.

Specialty Classes at Multiple Sites

SDCE should minimize the replication of classes that have limited audiences and/or specific facility or equipment requirements at multiple CE sites. At the sites visited by the team, some rooms could not be used for multiple types of classes and therefore sat empty a large percentage of the time. Several non-CDCP courses, such as beginning guitar, were offered at multiple locations, adding to the non-CDCP percentage and potentially dividing one large class into several smaller ones, adding to adjunct costs and lack of efficient FTES production.

Recommendations

The district/SDCE should:

1. Offer non-CDCP and limited audience courses at single sites.
2. Whenever possible, design classroom facilities to accommodate multiple course types.

Contract Anomalies

The district's negotiated pay rate for CE faculty as well as some other contractual provisions have led to higher than usual costs for noncredit instruction. As noted elsewhere, the district agreed to pay noncredit faculty the same hourly rate as credit faculty, effective January 1, 2015. FCMAT is not aware of any other district in the state negotiating a similar pay rate; most often noncredit instructional hours are paid at a rate between 75% and 90% of credit instruction. The rationale provided to FCMAT for the increase was to equalize apportionment for CDCP FTES, but CE FTES is currently only 75% CDCP. In addition, because the Education Code requires a noncredit FTEF to have 25 hours assigned in the classroom versus 15 for credit faculty, a much higher number of hours (25 vs. 15) is needed to comprise an FTEF.

The San Diego CCD's POA criteria have created a situation in which it would be difficult to reduce the load for current POA faculty. SDCE faculty have POA for all CE sites that teach courses in their discipline (contract provision 5.2.2.1), and many were grandfathered in if they had taught at least 10 semesters with no break of 18 months or more (contract provision 5.2.3.3). The most restrictive provision requires that POA faculty receive load equal to their average load over the last two semesters (contract provision 5.2.3.5), resulting in almost a guarantee that they will maintain their FTEF. Combined with the high number of full-time faculty who must be given 100% load, this clause seriously limits the ability of CE to reduce the number of scheduled classes or change the composition of its course offerings since POA faculty attach to specific disciplines. Other limiting clauses allow POA faculty to bump other non-POA and retired adjuncts to maintain their POA status. Finally, if a POA faculty member has a substandard evaluation, he or she must be given a remediation plan and allowed to teach another semester before termination (contract provision 5.2.10.3). These contract obligations taken together result in POA faculty essentially having permanent positions of up to 67% load.

The district should carefully consider the long-term costs of health benefits for CE adjuncts. Effective January 1, 2016, CE adjuncts with a load of 60% were granted a contribution by the district toward benefits (contract provision 10.3.2.2). FCMAT was told that the district is considering negotiating parity on this issue with credit faculty, who receive benefits at 50%. The district should analyze the cost of this change, particularly in light of the number of CE adjuncts it may add to the pool and in light of the POA provisions that make it difficult to reduce an adjunct's load.

The district should clarify the negotiated rules for use of sick leave for CE faculty and managers to avoid overuse of leave. Sections 7.2.3 and 11.2 of the contract specify the approved circumstances for use of sick leave and the requirement of manager approval. However, CE managers indicate that faculty sometimes inform them that they are taking sick leave without obtaining approval. Faculty also identify subs for themselves, although it is clear that ultimately managers must approve subs (contract provision 7.2.3). Training staff and faculty on these provisions could mitigate the annual cost overruns in the sub budget.

Release time for program chairs, assistant program chairs and others has a significant impact on the instructional adjunct budget. Release time is paid at the rate equal to credit faculty hours but is by definition nonproductive since it does not generate FTES. The team was told that 11 program chairs receive anywhere from 20% to 80% release time, dependent on total FTEF in their area (contract provision 9.2), and the number of assistant program chairs is not specified. For example, English as a second language has six assistant program chairs, each with 20% release time, while the Older Adult Program chair received 67% release time and has three assistant program chairs. In some cases, calculating release time based on FTEF creates an incentive to hire more adjuncts rather than create a streamlined and efficient schedule. Release time also adds to the adjunct budget as more faculty are hired to fill in the gaps left by the full-time faculty with release time. Other examples of release time are directors for categorical programs, such as Workforce Innovation and Opportunity Act Director at 80% release.

In addition, the district must increase the ratio of CDCP noncredit courses to offset the cost of the negotiated parity in pay. The team was informed in interviews that the district goal is to have 80% CDCP courses. Based on district supplied documents, in 2017-18, 6,114 FTES out of a total of 7,956 FTES were CDCP, or 77%. In 2018-19, CDCP FTES had fallen to 5,489 out of a total of 7,349, or 75%. In the last two years, the district has not met its goal of 80% CDCP FTES and therefore is not generating full apportionment for up to 25% of noncredit FTES. Even if the district meets its own 80% CDCP goal, there must be other cost-saving or revenue-generating measures to make up for the lower apportionment for non-CDCP courses, since non-CDCP courses are paid at a lower rate.

Recommendations

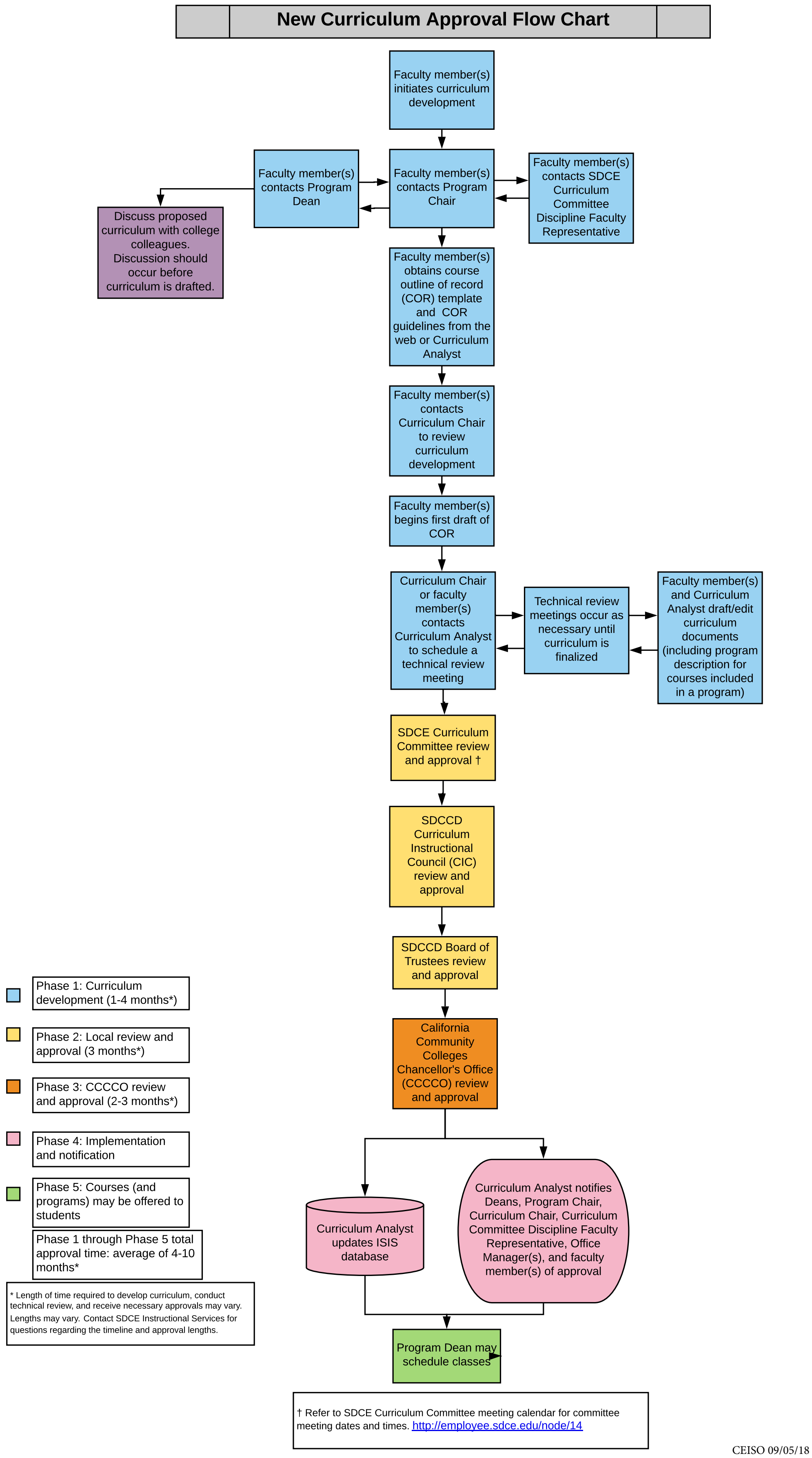
The district/SDCE should:

1. Consider renegotiating the pay structure for noncredit faculty, both full-time and part-time.
2. Consider renegotiating the POA provisions, which are more extensive than required by statute.
3. Analyze the long-term health care costs for adjuncts before altering the current provisions.
4. Set criteria for program chair and assistant chair positions that minimize release time and do not incentivize hiring more adjuncts regardless of student need.
5. Determine what percentage of CDCP courses is necessary to offset the lower apportionment generated by non-CDCP courses.
6. Recalibrate the percentage goals for both CDCP and non-CDCP courses based on what percentage of CDCP courses are necessary to offset the lower apportionment generated by the non-CDCP courses.

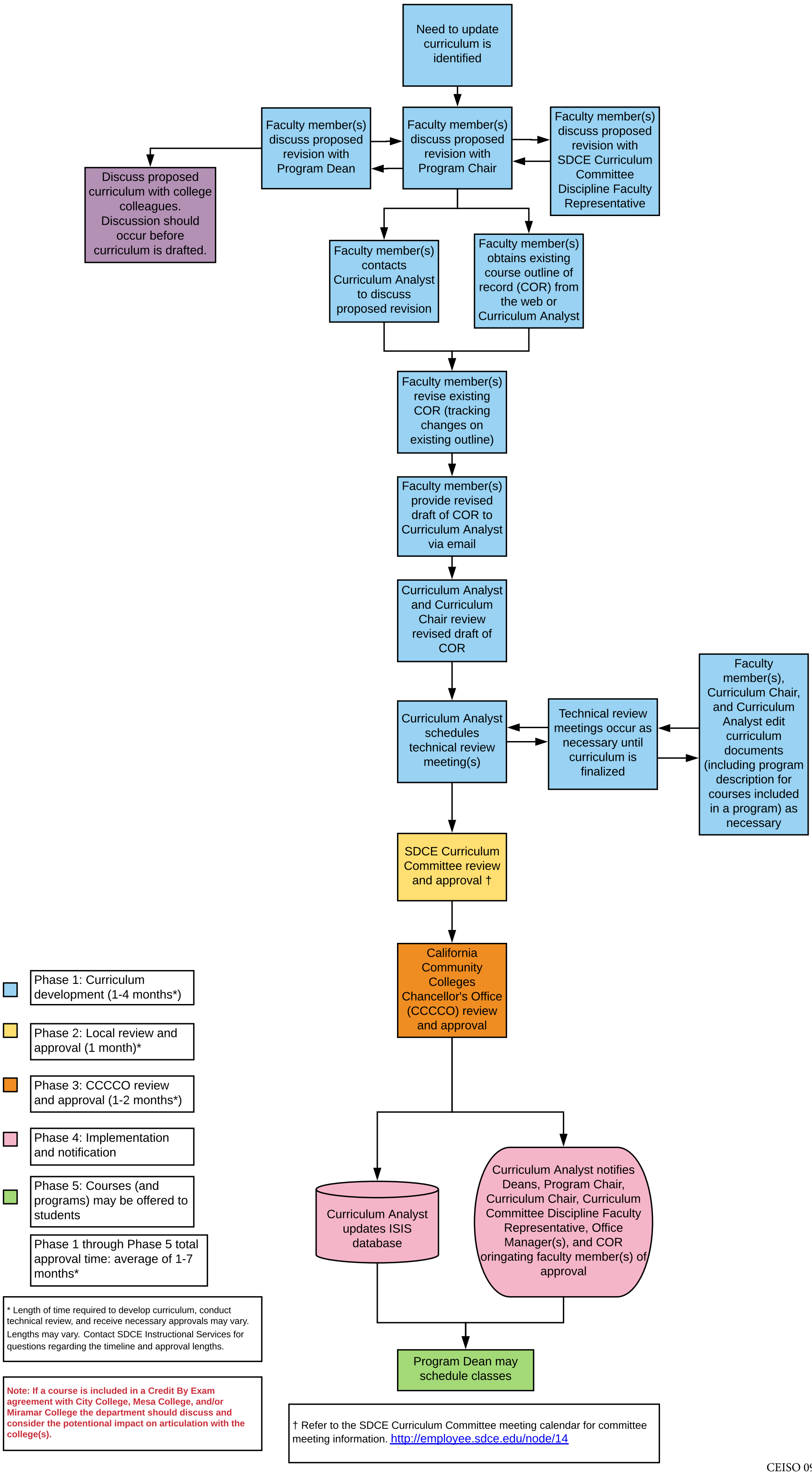
Appendices

Appendix A – New and Revised Curriculum Approval Flow Charts

Appendix B – Study Agreement


New Curriculum Approval Flow Chart
Faculty member(s) initiates curriculum development
Faculty member(s) contacts Program Dean
Faculty member(s) contacts Program Chair
Faculty member(s) contacts SDCE Curriculum Committee Discipline Faculty Representative
Discuss proposed curriculum with college colleagues. Discussion should occur before curriculum is drafted.
Faculty member(s) obtains course outline of record (COR) template and COR guidelines from the web or Curriculum Analyst
Faculty member(s) contacts Curriculum Chair to review curriculum development
Faculty member(s) begins first draft of COR
Curriculum Chair or faculty member(s) contacts Curriculum Analyst to schedule a technical review meeting
Technical review meetings occur as necessary until curriculum is finalized
Faculty member(s) and Curriculum Analyst draft/edit curriculum documents (including program description for courses included in a program)
SDCE Curriculum Committee review and approval †
SDCCD Curriculum Instructional Council (CIC) review and approval
SDCCD Board of Trustees review and approval
California Community Colleges Chancellor's Office (CCCCO) review and approval
Curriculum Analyst updates ISIS database
Curriculum Analyst notifies Deans, Program Chair, Curriculum Committee Discipline Faculty Representative, Office Manager(s), and faculty member(s) of approval
Program Dean may schedule classes
Phase 1: Curriculum development (1-4 months*)
Phase 2: Local review and approval (3 months*)
Phase 3: CCCCO review and approval (2-3 months*)
Phase 4: Implementation and notification
Phase 5: Courses (and programs) may be offered to students
Phase 1 through Phase 5 total approval time: average of 4-10 months*
* Length of time required to develop curriculum, conduct technical review, and receive necessary approvals may vary. Lengths may vary. Contact SDCE Instructional Services for questions regarding the timeline and approval lengths.
† Refer to SDCE Curriculum Committee meeting calendar for committee meeting dates and times. http://employee.sdce.edu/node/14
CEISO 09/05/18

Revised Curriculum Approval Flow Chart



FCMAT

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
June 24, 2019

The Fiscal Crisis Management and Assistance Team (FCMAT), hereinafter referred to as the team, and San Diego Community College District, hereinafter referred to as the (District), mutually agree as follows:

1. BASIS OF AGREEMENT

The team provides a variety of services to local educational agencies (LEAs). The District has requested that the team provide for the assignment of professionals to study specific aspects of the San Diego Community College District operations, based on the provisions of Education Code (EC) section 84041. These professionals may include staff of the team, county offices of education, the California State Department of Education, school districts, charter schools, community colleges, or private contractors. All work shall be performed in accordance with the terms and conditions of this agreement.

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

The scope and objectives of this study are:

Provide fiscal management assistance for an independent review of the district's non-credit program at San Diego Continuing Education (SDCE) and its five educational centers and make recommendations for fiscal efficiencies, if any.

B. Services and Products to be Provided

1) Orientation Meeting - The team will conduct an orientation session at the District to brief District management and supervisory personnel on the team's procedures and on the purpose and schedule of the study.

2) On-site Review - The team will conduct an on-site review at the District office, the SDCE campus and its educational centers, if necessary.

3) Exit Meeting - The team will hold an exit meeting at the conclusion of the on-site review to inform the District of significant findings and recommendations to that point.

4) Exit Letter - The team will issue an exit letter approximately 10 days after the exit meeting memorializing the topics discussed in the exit meeting.

5) Draft Report - Electronic copies of a preliminary draft report will be delivered to the District administration for review and comment.

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6) Final Report - Electronic copies of the final study report will be delivered to the District following completion of the review. The final report will be published on the FCMAT website.

3. **PROJECT PERSONNEL**

The FCMAT study team may include:

A.	Michelle Giacomini	FCMAT Deputy Executive Officer
B.	Shayleen Harte	FCMAT Deputy Executive Officer
B.	Irene Malmgren	FCMAT Community College Consultant
C.	Meridith Randall	FCMAT Community College Consultant

4. **PROJECT COSTS**

The cost for studies requested pursuant to EC 42127.8(d)(1) shall be:

A. $1,100 per day for each FCMAT staff member while on site, conducting fieldwork at other locations, presenting reports, or participating in meetings. The cost of independent consultants will be billed at the actual daily rate for all work performed based on the provisions of EC 84041

B. All out-of-pocket expenses, including travel, meals, lodging, etc. The District will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon acceptance of the final report by the District .

Based on the elements noted in section 2A, the total not-to-exceed cost of the study is $35,000.

C. Any change to the scope will affect the estimate of total cost.

Payments for FCMAT's services are payable to Kern County Superintendent of Schools - Administrative Agent located on 1300 17th Street, City Centre, Bakersfield, CA 93301.

5. **RESPONSIBILITIES OF THE DISTRICT**

A. The District will provide office and conference room space while on-site reviews are in progress.

B. The District will provide the following (if requested):

1) Policies, regulations and prior reports addressing the study request
2) Current or proposed organizational charts
3) Current and two prior years' audit reports
4) Any documents requested on a supplemental listing
5) Any documents requested on the supplemental listing should be provided to FCMAT in electronic format; if only hard copies are available, they

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should be scanned by the District and sent to FCMAT in an electronic format.

6) All documents should be provided in advance of fieldwork; any delay in the receipt of the requested documentation may affect the start date and/or completion date of the project. Upon approval of the signed study agreement, access will be provided to FCMAT's SharePoint document repository and all requested documents shall be uploaded by the District.

C. The District administration will review a draft copy of the report resulting from the study. Any comments regarding the accuracy of the data presented in the report or the practicability of the recommendations will be reviewed with the team prior to completion of the final report. The final report will be published on the FCMAT website.

6. PROJECT SCHEDULE

The following schedule outlines the planned completion dates for key study milestones and will be established upon the receipt of a signed study agreement:

Orientation:	***July 24, 2019***
Staff Interviews:	***July 24-26, 2019***
Exit Meeting:	***July 26, 2019***
Draft Report Submitted:	***To be determined***
Final Report Submitted:	***To be determined***

7. **COMMENCEMENT, TERMINATION AND COMPLETION OF WORK**

FCMAT will begin work as soon as it has assembled an available and appropriate study team consisting of FCMAT staff and independent consultants, taking into consideration other jobs FCMAT has previously undertaken and assignments from the state. The team will work expeditiously to complete its work and deliver its report, subject to the cooperation of the District and any other parties from which, in the team's judgment, it must obtain information. Once the team has completed its fieldwork, it will proceed to prepare a draft report and a final report. Prior to completion of fieldwork, the District may terminate its request for service and will be responsible for all costs incurred by FCMAT to the date of termination under Section 4 (Project Costs). If the District does not provide written notice of termination prior to completion of fieldwork, the team will complete its work and deliver its report and the District will be responsible for the full costs. The District understands and agrees that FCMAT is a state agency and all FCMAT reports are published on the FCMAT website and made available to interested parties in state government. In the absence of extraordinary circumstances, FCMAT will not withhold preparation, publication and distribution of a report once fieldwork has been completed, and the District shall not request that it do so.

8. **INDEPENDENT CONTRACTOR**

FCMAT is an independent contractor and is not an employee or engaged in any manner with the District. The manner in which FCMAT's services are rendered shall be within its sole control and discretion. FCMAT representatives are not authorized to speak for, represent, or obligate the District in any manner without prior express written authorization from an officer of the District .

9. **INSURANCE**

During the term of this agreement, FCMAT shall maintain liability insurance of not less than $1 million unless otherwise agreed upon in writing by the District, automobile liability insurance in the amount required under California state law, and workers' compensation as required under California state law. FCMAT shall provide certificates of insurance, indicating applicable insurance coverages upon request.

10. **HOLD HARMLESS**

FCMAT shall hold the District , its board, officers, agents and employees harmless from all suits, claims and liabilities resulting from negligent acts or omissions of its board, officers, agents and employees undertaken under this agreement. Conversely, the District shall hold FCMAT, its board, officers, agents and employees harmless from all suits, claims and liabilities resulting from negligent acts or omissions of its board, officers, agents and employees undertaken under this agreement.

11. CONTACT PERSON

Name: Bonnie Ann Dowd
Telephone: 619-388-6975
E-mail: bdowd@sdccd.edu

Bonnie Ann Dowd June 24, 2019

Bonnie Ann Dowd, Ed.D, MBA, CMA, Executive Vice Chancellor Date
San Diego Community College District

Michael H. Fine June 24, 2019

Michael H. Fine Date
Chief Executive Officer
Fiscal Crisis and Management Assistance Team

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