



January 20, 2023

To: Shemia Fagan, Secretary of State
Kip Memmott, Audits Director
Oregon Secretary of State's Office

CC: Ben Cannon, Executive Director
Donna Lewelling, Director, Office of Community College & Workforce Development
Higher Education Coordinating Commission

From: Morgan Cowling, Executive Director
Oregon Community College Association

Oregon Community College Association (OCCA) and the 17 community college presidents received the Secretary of State's audit report of the Higher Education Coordinating Commission (HECC), "Oregon Must Improve Community College Performance, Student Support, and Sustainability Amid Persistent Enrollment Declines," on Dec. 19, 2022. OCCA and the 17 community college presidents have diligently reviewed and discussed the report and its findings. Here is a summary of our feedback.

GENERAL FEEDBACK ON REPORT & RECOMMENDATIONS

- The report brings to light a variety of issues within the HECC that OCCA and the colleges have been aware of for some time, and we look forward to working with HECC to improve outcomes and student success.
- **The audit report appears to be more about how the colleges are (or are not) performing as opposed to an audit of the HECC as an agency, which is what the audit was supposedly intended to examine.**
- The recommendations themselves are, for the most part, appropriate but should be handled carefully. **Colleges each represent different demographic and economic communities around the state, and as such strong consideration should be given to the value of community in community colleges.** If student success metrics, for example, don't take this into account, they will fail to impact those who need the colleges the most.
- **There is a lack of awareness in the report of the unique challenges community colleges face in regard to the students we serve as part of our commitment to being open access institutions and how we serve those students to achieve student success.**
- **More staffing at the HECC to address issues brought up in the audit is not necessarily the answer.** It may be more appropriate to increase institutional effectiveness staffing at colleges to meet these data needs.
- **Colleges already work together for some consolidated services to reduce costs.** More effort from HECC to support these initiatives is needed. *[In response to Recommendation #6]*

HECC Authority

- **The HECC and Legislature need to maintain their role of broad policy/strategy and goal setting, not get into the operations of the colleges.** The Oregon way has been to allow for local control to account for the many differences in communities throughout the state, so colleges should continue to operate in ways that best serve their individual communities. The conclusion that community colleges need more oversight from the HECC would create the impression to communities that community colleges are not responsible and that their elected boards and the NorthWest Commission on Colleges & Universities (NWCCU) are not responsible governing bodies. It also would create the impression that community

colleges are not accountable or transparent. To be characterized in this manner in the audit is highly disappointing and discouraging, particularly to our faculty and staff who have just weathered COVID-19 and its many stresses, which included the closing of our campuses to most face-to-face instruction.

- The report states on page 12 that “Given its limited statutory authority, HECC cannot force colleges to make operational changes; college boards are responsible for college operations.” The community college boards, in fact, are not responsible for college operations; they are responsible for policy, strategic direction, and budgetary oversight. As the NCHEMS higher education landscape study recommended in Fall 2022, our institutions would like to see HECC take a broader role in setting strategic priorities, advocate for the resources to meet those priorities, and hold the colleges accountable by standards upon which we can all agree.

FUNDING

- The audit finds that efforts to support systemically marginalized students are neither well-funded nor particularly well assessed at the state-level. **Colleges need adequate and stable funding for these efforts.** *[In response to Recommendation #6]*
- The audit recognizes reforms the colleges have been undertaking in effort to improve student outcomes such as redesigning developmental education and implementing Guided Pathways. It also points out that **colleges have been relying on grants rather than ongoing state funding to support this work. Colleges need state-level support to continue this work.** *[In response to Recommendation #6]*
- Existing financial aid does not cover the full cost of attending a community college in Oregon and the Oregon Promise grant focuses only on students who have recently graduated from high school. **Financial aid programs should be authorized and designed to better serve older students, part-time students, and non-credit/short-term certificate seekers who are often ineligible for aid under the current systems and structures.** *[In response to Recommendation #5]*

DATA

- The audit finds state and college-level data is urgently needed to help colleges in strategic planning to improve student outcomes. **There is a critical need for consistent, meaningful state-level data and analysis, and the need to develop common metrics and definitions in collaboration with the colleges.** *[In response to Recommendation #2a-2e]*
- Numerous data points within the audit were incorrectly reported. This misinformation can threaten colleges’ abilities to recruit and retain students and maintain trust and transparency within their communities.
- The HECC and SOS’s Office should have verified data with the colleges prior to the audit’s publication to ensure its accuracy and that appropriate context was provided.
- Community college enrollments are not equitably represented by IPEDS, and use of IPEDS in reports such as the audit results in inaccuracies. **The HECC should work with the colleges to identify a data system that meets accreditation standards and equitably represents enrollments. There needs to be clear statewide definitions and metrics for data use and to report outcomes on student success and enrollment.**
- **The HECC and colleges need to work together to reevaluate what data is collected and why so that the data can be meaningful for examining outcomes.** There is currently a disconnect between the data collected and the context and action to utilize the data for continuous improvement. If the HECC needs different data for a particular reason, the colleges are happy to provide that information – just ask.
- **Appropriate context was not always provided in the audit regarding data, particularly enrollment.** For example, Oregon’s community college enrollment was down significantly more than in other states



because the state shut down our ability to provide in-person programming during COVID-19, which severely impacted CTE programs/enrollment. This context was not provided in the audit report.

- In addition, non-credit programming and enrollment was not included in the vast majority of this report, missing an entire part of the community college story.
- The limited staff the colleges do have strive to meet the myriad of data collection requirements they face from numerous entities and to be as transparent with the data as possible.

NEXT STEPS

- **Community colleges must be an integral partner in any initiative implementing next steps or recommendations.** The recommendations outlined in the audit report need further discussion and OCCA and the colleges hope to be a part of the conversation moving forward.
- **The colleges and OCCA want HECC to be a more collaborative and engaged partner.** OCCA and the colleges want to be a strong partner with HECC to support students, and to be accountable to our communities and transparent with data and funding. HECC should support and leverage existing affinity groups of experts at the colleges (i.e., CIA, CSSA, OCCIRS) to create, garner support for, and move recommendations forward.
- The Secretary of State Audit along with the report by NCHEMS and work of the Joint Task Force on Underrepresented Student Success in Higher Education, there is a significant amount of energy and effort going into improving outcomes for students and accountability among the colleges. We look forward to working with the HECC, legislators and the Governor to help make the best strategic decisions that will drive continually improving outcomes for students.