Date: October 22, 2010

To: Dr. Andreea Serban
805.966.3402

From: Kathy Carroll for Dr. Barry Russell
California Community Colleges Chancellor’s Office

Subject: Compliance of Noncredit Courses

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October 22, 2010

Dr. Andreea Serban
Superintendent/President
Santa Barbara City College
721 Cliff Drive
Santa Barbara, CA 93109

Dear Dr. Serban:

I am writing to re-iterate my support for the work of the Santa Barbara City College (SBCC) administration over the past year to bring noncredit courses in compliance with California Code of Regulations, title 5.

On April 4, 2005, the Chancellor’s Office issued Legal Advisory 05-03 Requirements for Claiming Apportionment for Noncredit Courses, delineating applicable statutes and regulations for offering noncredit courses. I distributed to community college administrators on January 22, 2010, a memorandum on “Avocational, Recreational, and Personal Development Courses.” In addition, I distributed on April 26, 2010, a memorandum to community college administrators, curriculum committee chairs and the Association of Community and Continuing Education (ACCE), in which I stated the following:

"Returning to the priorities identified in the January 22, 2010 memo, please examine your noncredit course offerings for the 2010-2011 academic year in the 0835.xx (Physical Education) or 1008.xx (Dance) T.O.P. codes. If you choose to offer these courses, even though they may have been approved by the Chancellor’s Office, you may not include those courses in your noncredit attendance calculations for the Apportionment Attendance Reports (CCFS-320) submitted to the Chancellor’s Office...and therefore you may want to review the fiscal efficacy of such a decision.”

It is my understanding that the Santa Barbara City College administration, under your direction, continues to conduct an extensive review of noncredit courses. The SBCC Continuing Education Division administration has been in ongoing communication with staff in the Chancellor’s Office regarding specific courses under review, and whether they meet the criteria for claiming state apportionment. These include, but are not limited to, courses in various funding categories for noncredit, such as Family and Consumer Sciences, Parenting Education and Education Programs for Older Adults. A summary of the review of noncredit courses in these categories is provided below.

The process for claiming apportionment for noncredit courses has two components:

1. Colleges must ensure that each noncredit course meets the basic standards and criteria for noncredit offerings, and
2. Colleges must ensure that the additional standards for claiming apportionment are met.
Family and Consumer Sciences (Home Economics) Category

A July 21, 2004 communication to the SBCC Continuing Education Division administration from LeBaron Woodyard, Dean, Academic Affairs, Chancellor’s Office, informed SBCC that many cooking recipe style courses (e.g., Sushi for Singles) submitted for approval were denied because courses that mainly focus on learning a particular recipe are primarily recreational in character and are more appropriate to be offered through community service.

It is my understanding that during spring 2010, after a curriculum review of noncredit cooking courses, SBCC converted a number of recipe style cooking noncredit courses to fee-based courses because they did not meet minimum conditions for claiming apportionment (state funding). Such courses are more appropriate as community services offerings, which are offered for a fee paid by students to cover the cost of instruction. This was an appropriate and wise decision by SBCC to ensure compliance with state regulations.

Parenting Education Category

Another review of parent education courses determined that a course titled Parent Child Workshops did not meet minimum standards for claiming apportionment. The SBCC administration worked with faculty and submitted two new course outlines for review and approval. On September 29, 2010, the Chancellor’s Office informed SBCC that the two revised courses still were not appropriately designated under the Parenting Education Category and should be withdrawn. These courses, as described in the course outlines of record, would be more appropriately categorized as Short-term Vocational courses. Parenting courses should be designed with content and objectives that focus on necessary skills for parents and not on skills that prepare child care workers for employment. Courses in the Parenting Education Category should include instructional activities that are appropriate for training parents to care for their own children.

It is my understanding that the SBCC administration is working with faculty to revise these courses to meet the criteria of Parenting Education. When this work has been done, the courses will be re-submitted through the Curriculum Inventory and will be reviewed again.

Education Programs for Older Adults Category

An ongoing review of courses for older adults in the area of music revealed that Concert Band, Concert Choir, Symphony Orchestra, and Big Band Jazz Performance did not meet the guidelines for funding as noncredit courses. Stephanie Low, Dean of Curriculum and Instruction, confirmed that the Chancellor’s Office did not accept SBCC’s documentation of local approvals without proper signatures showing that the courses were approved by the college curriculum committee and district governing board as required by title 5, section 55002. Dean Low agreed that it is appropriate for SBCC to remove these courses from the noncredit schedule and inventory until documentation of local approval can be provided.

Numerous inquiries from SBCC students, faculty, local attorneys, and community members have been received by staff in the Chancellor’s Office regarding curriculum, course outlines of record, and questions related to the determination of whether to offer noncredit courses as state-supported courses. The Chancellor’s Office does not interfere with local district and/or college administrative decisions related to specific courses. Rather it is each college’s responsibility to examine their noncredit courses to ensure compliance with state regulations. Therefore, the staff at the Chancellor’s Office have repeatedly conveyed to such individuals that what SBCC is doing is correct and appropriate and that these individuals need to consult with the SBCC administration on these topics if there are questions or concerns.
The Chancellor's Office expects and relies on all community colleges in our system to take appropriate steps to ensure compliance, as we understand that you have done and continue to do. Attempts to try to find workarounds to avoid compliance are not appropriate and we hope that members of the Santa Barbara community will support your work and efforts in ensuring that SBCC's Continuing Education Program is in full compliance now and in the future.

I wish you and Santa Barbara City College the best in your endeavor to offer classes which meet the needs of your students. If there is anything I can do to assist you, please do not hesitate to ask.

Sincerely,

Barry A. Russell, Ph.D.
Vice Chancellor of Academic Affairs

BAR/kc

cc: Dr. Jack Scott, Chancellor
    Erik Skinner, Executive Vice Chancellor
    Dean Stephanie Low, Academic Affairs
    Joanne Vorhies, Academic Affairs