Shared governance is enshrined in the CSU-AAUP/BOR Collective Bargaining Agreement and the governing documents of our university. In his October 17 letter to the CSCU community, President Ojakian suggests that the requirements of shared governance were satisfied with regard to Students First by the selection of individuals from the campuses from a pool nominated by campus leadership to serve on the planning teams. But this is at best a partial understanding of the requirements of shared governance. These campus representatives did not consistently report to or seek input from campus governance bodies as shared governance would require. Nor, once the reports were written, were they presented to campus governance bodies for response. Placing individuals from the campuses on planning teams and providing a feedback portal after the reports are released neither fulfills the requirements of genuine shared governance nor enables its benefits to all parties involved.

Shared governance assigns sole responsibility for academic matters including curriculum, policy, and admission and graduation standards to the faculty. Any Students First proposals that involve these areas of faculty authority (e.g. enrollment management) should have been submitted to faculty governance bodies for approval.

Shared governance also gives to faculty governance bodies the right and obligation to advise on all matters pertaining to the university not under the direct control of the faculty. Virtually every aspect of Students First should have been provided to faculty governance bodies with adequate time and information for discussion.

The timing of the release of the reports and the request for input via the portal demonstrates either an ignorance of or a disregard for the nature of campus culture and the functioning of shared governance. To be given roughly a month to comment does not allow the necessary time to read carefully six complicated reports, research and evaluate their claims, gather testimony from experts (including the campus representatives that served on the planning teams), discuss in open fora, formulate responses, and approve them through established governance procedures.

Many of the proposals themselves would shift decision-making from the individual campuses to the System Office. This would deprive campus governance bodies of their ability and right to conduct meaningful discussion and offer meaningful advice on matters of significance to their campuses.

The six reports contain dozens of suggestions. We are told that some will be presented to the Board of Regents for approval, some are merely “administrative” and require no such approval prior to implementation, and some may already be in the process of implementation. If some recommendations need no approval and some are in effect already approved, the call for feedback appears to be either a sham or a waste of time.
• Given that the purported impetus for Students First was to save money, the financial accounting associated with the reports is woefully inadequate. In some instances savings and other gains are asserted with no evidence of how they were calculated (e.g. the $2M to be had from increased enrollment by outsourcing financial aid verification); in some cases savings are asserted without being specified, or even estimated, numerically; in some proposals that combine costs and savings, the latter are listed but the former are not (e.g. the “right-sizing” of maintenance staffs, which would seem to require not only reductions through attrition but also additional hiring at under-staffed campuses). Most of the reports do not offer clear summaries of expected costs and savings (much less evidence to support the latter), and there is no overall balance sheet for the totality of the six plans. There is no evidence—indeed, not even an assertion—that the various proposals will produce anything like the savings initially promised by President Ojakian. To implement a plan of this magnitude and of such disruptive potential without evidence that it will fulfill its stated goal is unconscionable.

• This lack of financial clarity is troubling in two areas in particular: personnel and software.

  o Personnel is a particularly sensitive area, as it directly affects individuals’ livelihoods and lives. Any proposal to eliminate positions, even by attrition, requires special scrutiny and careful justification. Yet too often in the planning team reports’ plans for staff reductions are vague, with justification or anticipated savings missing or unclear and impact on the campuses unexplored. And too often reductions on the campuses are offset at least in part by hiring at the System Office, often without an accounting or even an estimation of the associated costs. Nor are the practical consequences of this shift for the affected campuses adequately explored (this is a prime example of the need to genuinely and formally consult with the campuses through their governance bodies, rather than relying on individuals to provide feedback).

  o Too often savings are asserted to be available through the purchase of third-party software that will be implemented system-wide to standardize, streamline, or automate functions. Rarely is there any evidence that the applicability or efficacy of such software has been studied; in some cases there is no evidence that such products even exist. This enthusiasm for the ability of software to solve complex problems across multiple campuses, coupled with a lack of careful research or scrutiny and an absence of cost data (including maintenance and updates), is all the more troubling given the system’s unhappy experience with such purchases in the past.

• The lack of genuine consultation with the campuses after the release of the plans creates another important problem: because each campus is different, a proposal that might benefit some may harm others, and these harms are rendered invisible by the lack of consultation. For instance: the proposal to outsource financial aid verification asserts (without evidence) an average wait of up to 21 days and claims (also without evidence) that the time saved by outsourcing will keep students from going elsewhere and thus raise
enrollment and revenue. But at CCSU the average wait time for verification is closer to 1-2 days, and can often be done on-the-spot while students are still in the financial aid office. This is faster than the turnaround expected through outsourcing. Have the enrollment and revenue losses that will be suffered because of increased verification time at CCSU been calculated into the projected system-wide revenue and enrollment gains? Will campuses that would be harmed by this or other proposals be permitted to opt out of system-wide proposals that will negatively impact them? Is it either ethical or practical to penalize high-achieving campuses for their success in order to aid other campuses?

- NEASC has, in its letter of August 11, 2017, expressed significant concerns about the impact of Students First on the ability of CSCU campuses to meet accreditation standards. President Ojakian’s response commits to providing NEASC with a formal proposal and the Substantive Change report required before implementing an undertaking as significant as Students First, but it appears that implementation of elements of Students First has begun in the absence of NEASC review. As CCSU prepares its accreditation self-study in anticipation of a NEASC site visit in September 2018, we have grave concerns about the impact of the ongoing implementation of Students First on our accreditation.

The sum of these concerns clearly indicates that in their current form the proposals that comprise Students First and thus Students First itself is unclear, underdeveloped, delivers fewer benefits than promised, threatens harms both foreseen and unforeseen, and runs contrary to the governance, evidentiary, and ethical foundations of the institutions it would govern. By way of remedy, we suggest that the Board of Regents take the following steps:

1. Immediately halt the implementation of any Students First proposals, including those said to not require Board approval, until
   a. The campuses can conduct the evaluative and advisory processes required by genuine shared governance and share their findings with the Board
   b. The Board itself can scrutinize the proposals with the care required of such a momentous change to the institutions it oversees

2. Perform its fiduciary duty to the CSCU system by requiring a thorough accounting of the savings and other financial gains to be had through the Students First proposals as well as the offsetting costs, supported by plausible evidence that this accounting is accurate.
   a. Make this accounting available to the campuses.
   b. Pay particular attention to the impact of personnel losses and movement
   c. Require clear evidence that plans to acquire and implement third-party software are cost-effective and likely to produce the promised results

3. Commit to holding harmless any campus that would be harmed by system-wide standardization by allowing that campus to opt out of any such standardization.
   a. Consider, in such cases, encouraging the adoption of the successful campus’ systems and strategies by other campuses instead of forcibly implementing a one-size-fits-all plan.
4. Prohibit the implementation of Students First until we have a reasonable assurance from NEASC that it will not negatively affect the accreditation of any of the CSCU institutions.