

To President Mark Ojakian
From Dr. Mark Jackson, President of the Faculty Senate at Central Connecticut State University on Behalf of the Senate
RE Restructuring of the Office of Institutional Research and Assessment (OIRA) at CCSU
Date March 25, 2019

On March 25, the Faculty Senate at CCSU reviewed and voted to endorse this memo and the accompanying resolution. The Senate also charged Senate President Mark Jackson to facilitate communication with the system office on this matter.

The Faculty Senate at CCSU objects to the proposed restructuring of the Office of Institutional Research and Assessment (OIRA) that would assign personnel to functional areas and reallocate a portion of their time to engage in activities to support the CSCU system office or other institutions in the system.

We assert that the proposed change will not save money, will result in inefficiencies and inaccuracies, will unfairly distribute costs, will weaken the integrity of CCSU as an accredited institution and perhaps violate accreditation standards, and that any potential benefits associated with the restructuring do not outweigh the manifest costs. This memorandum outlines the rationale for this claim.

We request that CCSU be exempted from the proposed restructuring of our Office of Institutional Research and Assessment (OIRA).

If an exemption is not granted, then we request a written explanation that explains our errors in assessing the costs and benefits of the proposal, and request an opportunity to address this matter before the appropriate subcommittee of the Board of Regents prior to the start date of July 1, 2019.

Preliminaries

We understand that the system office has an obligation to abide by the policies and resolutions issued by the Board of Regents, and that the Students First initiative called for the consolidation and centralization of some “back office” functions, which included IR. We also understand that the principle justification for Students First is to save money by achieving economies of scale, eliminating redundancies, and leveraging expertise across the system. Nevertheless, we also believe it is our obligation to point out that the plan to achieve these aims will incur more costs than benefits.

We also accept the idea associated with the organizational drawing with a solid line between the CSU President and the OIRA and a dotted line between the system office and the respective IR offices. This merely repeats the status quo. The principle duties of OIRA personnel is to serve the institutional mission and institutional strategic planning under the guidance of the campus President, and that the system office often needs to make requests for data and analyses to meet its own reporting needs to which the OIRA is accountable. The restructuring, however, mandates “a new stronger dotted-line relationship,” which implies that the system office will become more directive over the time and the duties of OIRA personnel.

Rationale

1. No Savings. The *sine qua non* of Students First is to reduce costs. In the proposed restructuring, however, there is no indication that there will be any reduction in personnel, and so, no savings will be realized.

The CCSU OIRA office currently has three full time members, but is in the process of adding a fourth member. The OIRA office has been advocating for the additional position for some time, and President Toro has agreed to fill that position during FY19 based on a demonstration that the required workload exceeded the time capacity of the existing OIRA staff. The staff is larger at CCSU than at the other state universities because responsibilities for assessment are included in the office, which is not so everywhere else, and because the office plays a large role in monitoring all accreditation matters.

As the principle reporting line remains to the CCSU President, presumably CCSU will retain these four positions. At the other CSUs, the IR offices consist of one to one and a half individuals, which would seem to mitigate against personnel reductions at those institutions as well.

If reductions in IR staff are proposed for the Community College consolidation, surely those reductions can take place without drawing labor time from the CSUs to subsidize the community colleges.

2. Inefficiencies and Loss of Quality. The proposal to pull together IR staff at the system level and then redistribute work into cross-campus IR work teams or groups, such as a Policy Group, an Analytics Group, a Reporting Group, etc. will reduce efficiency. It will require a significant amount of monitoring at the system level to aggregate, disaggregate, and then reaggregate tasks between individuals and across campuses. The proposed structure will transform holistic, project-oriented tasks at the campus level into a series of coordinated, segmented tasks, in which, for example, the person who analyzes data is different from the person who writes the report. Such separations may result in errors because the report writer may not be aware of certain operationalizations, or may misinterpret the denominator that was used in the calculation of a percentage (e. g. was that percentage out of the total number of full-time students, or was it the total number of full-time equivalent students?).

Much of the work of the OIRA requires ongoing communication and coordination with other campus officers such as Admissions, the Registrar's Office, the Finance Office, the University Planning and Budgeting Committee, Academic Departments, and the President's Office. This close coordination is necessary to insure validity in the collection and interpretation of data. Disaggregating work and then spreading tasks across campuses will either create inefficiencies as IR staff will need to contact offices at other campuses for clarification, or misinterpretations because of a lack of awareness of some of the differences in processes and practices at other campuses. These types of problems will be especially acute when CSU IR personnel work with data from the CCs and vice versa.

In particular, OIRA staff responsibly assist university-accredited program directors,(currently we have 26 different accrediting bodies represented on our campus with a total of 70 programs that carry accreditation) such as CAEP, AACSB, ACCE, ATMAE and ABET (under ABET we have two different accreditation standards one is called EAC-ABET and the other is TAC-ABET--

these reflect the differences in programs that are ENGINEERING vs ENGINEERING TECHNOLOGY respectively as well as CAC-ABET for computer science).

The OIRA office also plays a critical role in our institutional strategic planning process, as well as providing critical service on CCSU's University Planning and Budgeting Committee (UPBC).

Unlike most of the other CSCU institutions where Institutional Research operations are in a dedicated office, CCSU's Office of Institutional Research and Assessment (OIRA) houses not only IR, but also the university's extensive Assessment initiatives - both Academic Program Assessment and the university-wide General Education Assessment Initiative. OIRA staff also work directly with all departments in offering advice on academic assessment, as well as provide a careful review with written feedback on assessment. This ongoing relationship is especially important in assisting academic departments undergoing program reviews.

The OIRA Director currently serves as the NECHE liaison, responsible for coordinating and overseeing the self-study, writing the subsequent follow-up response, and attending regional NECHE meetings. The Director is also the chair of the Student Success Team, coordinating a committee of faculty and administrative faculty from all divisions to develop initiatives aimed at student success, retention and graduation.

In sum, the vast majority of the work of the OIRA staff addresses specific institutional needs. We believe it is essential for both efficiency and accuracy that the work be produced through collaboration and in the context of direct relations between various CCSU departments and the OIRA staff.

The one task that might be regarded as relatively consistent across campuses is the production of the Integrated Postsecondary Education Data System (IPEDS) reports, although the four-year institutions have reporting requirements that are not shared with the two-year schools. There is, however, nothing to be gained by aggregating and disaggregating the production of IPED reports as the knowledge and skill to produce them is widely shared among all IR staff.

Finally, the underlying logic of breaking down staff into functional work groups is the obverse of what is being proposed in other areas of Students First. For example, the intent to expand the number of people in enrollment requires staff to be cross trained with more generalized skills, so that they can assist with advising, recruitment, admissions or graduation reviews. The hiring of deans that can bridge both academic affairs and student affairs is another example.

3. Lack of Basic Fairness. On the CSU campuses, the offices of Institutional Research are structured differently. The CCSU's OIRA houses not only IR, but also the university's extensive Assessment initiatives. We have three (soon to be four) full-time personnel while the other CSUs have one or one and a half. If the expectation is that all IR personnel will contribute 25 percent of their time to system defined activities, then CCSU will be contributing a much larger share than the other institutions.

4. Accreditation Standards. NECHE Standards of accreditation, especially standard 2, on planning and evaluation requires that the "institution demonstrates its success in strategic, academic, financial, and other resource planning and the evaluation of its educational effectiveness." Aside from the essential leadership from the President's office, no other department on CCSU's campus is more integrated into the planning and evaluation process than OIRA. We are of the firm opinion that the OIRA needs to be fully engaged in meeting this

requirement, and assert that the appropriation of the duties and responsibilities of the OIRA weakens and perhaps even jeopardizes the ability of CCSU to meet its accreditation standards.

The April 25, 2018 from NEASC in response to the Substantive Change Request for the community college consolidation specifically emphasizes the value and the importance of a campus-based IR office. CCSU just completed its ten-year review. In the projection for standard 2, the report identifies the uncertainties associated with the Students First proposal as potentially weakening the ability of CCSU to meet its accreditation standards. The report includes the following:

"Students First may negatively impact many offices involved with planning and evaluation, including OIRA, fiscal affairs, and information technology. Despite notification from NEASC not to consolidate institutional research in the letter, the latest proposal, as of June 21, 2018 includes that consolidation. These offices may be centralized within the system, impacting the level of service delivered to the campus community, as well as the University's ability to control processes and decision-making authority.

NECHE accreditation standards requires that IR and Assessment serve the institution in meeting its educational mission. That priority must remain.

5. Potential Costs Outweigh Benefits. We recognize that the "new stronger dotted-line relationship" may provide some benefits to the system office in its ability to analyze data and meet its reporting responsibilities, but from a CCSU perspective, the "benefit" side of a cost-benefit ledger is empty. We believe the system office should be marshalling resources to serve the institutions that educate students, and that the goal should not be for the institutions to serve the system office.

In the past, CCSU's Office of Institutional Research and Assessment has always stepped up to assist the CSCU Central office in their need for information specific to the campus, providing them with ad-hoc information for legislative requests as well as helping to establish reliable Assessment of Student Learning models - ones that have been regionally recognized by NEASC and nationally showcased by AAC&U and in The Chronicle of Higher Education. In fact, when the September 21, 2017 "*CCSU [CSCU] Assessment Initiative: A CSCU Assessment Council Activity*" memo was released outlining a system-wide GenEd Assessment initiative, it was a clear derivative of CCSU's well-established GenEd Assessment model. We anticipate a continuation of the current working relationship between CCSU's OIRA and the system office.