

Notes on Proposed Title 5 Changes to Repeatability

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Overview

After many months of discussion, we now have a draft version of proposed changes to Title 5 regulations regarding repeatability. These draft changes, if accepted, will have an effect on every one of our departments offering credit courses. Some departments in particular will be significantly affected. The purpose of this document is to provide a summary of the proposed changes, so that we can be informed and provide response through the various means we have available.

In terms of process, these proposed changes have been distributed to Chief Instructional Officers and Chief Student Services Officers throughout the state, and they have been asked to provide initial feedback. There will be a series of meetings related to these proposed changes:

April 13 - Review by the System Advisory Committee on Curriculum (SACC)

April 19 - Review by Consultation Council

May 7-8 - First Reading by the Board of Governors (and 45-day public comment period)

Changes to Title 5 regulations require two readings at the Board of Governors, and then a 180-day period before going into effect, so it's likely that the earliest these changes could take place is Spring 2013. However, it is likely that any enrollments that students are in now will count towards future limitations.

What about Noncredit?

There are no proposed changes to repeatability for noncredit classes.

Repetition vs. Repeatability

The changes deal with two related concepts: course repetition and course repeatability.

- Course repetition applies when some, but not all, of the students qualify to re-enroll in a course. Examples of situations that allow for course repetition include alleviating substandard coursework, legal training requirements, and extenuating circumstances.
- Course repeatability is a feature of the course, in which any student can re-enroll in the course, up to a certain limit.

Changes in Repeatability

The proposed changes would significantly curtail our ability to designate courses as repeatable. We would only be able to designate as repeatable courses that meet one of the following criteria:

- Intercollegiate academic or vocational competition where the course is part of a district sanctioned competitive activity
- Intercollegiate athletics
- Courses that are part of a sequence of transfer courses required by CSU or UC for completion of a bachelor's degree

At City College of San Francisco, the first two of these three criteria are straightforward:

- The first criteria would apply to SPCH 37 and 38.
- The second would apply to our PE Athletics courses.

Determining courses to which we'd be able to apply the third criteria would require some homework, and raises some questions.

The proposed regulations would require us to maintain supporting documentation that verifies the CSU or UC sequence of transfer courses requirement, and makes that documentation subject to audit. We do not know what the form of that documentation would be.

At the very least, I would imagine that we would no longer be able to designate as repeatable courses in the following areas:

- Auto/Moto/Construction
- Broadcasting
- Child Development
- CNIT
- Culinary Arts
- English
- Fashion
- Health Care Technology
- Horticulture
- Learning Assistance
- Welding

I think that further exploration about the applicability of repeatability would be needed for the following areas:

- Cinema
- Design
- Floristry
- Graphic Communications
- Photography

As for courses in Visual and Performing Arts (e.g., Art, Dance, Music, Theater), this change would restrict our ability to have repeatability to just those courses where we could show transfer applicability. This could leave out some of our more esoteric courses, which may not have specific transfer applicability.

Course Repetition

There are still many ways that students can qualify to repeat a course. The ones that would be applicable to City College of San Francisco are:

- Alleviating substandard coursework
- Significant lapse of time since the last enrollment
- Extenuating circumstances
- Occupational work experience courses
- Legally mandated training requirements
- Related activity courses

(there is also language about variable unit open-entry/open-exit credit courses, but we don't have any of those)

Much of the language surrounding these repetition situations remains unchanged. Two areas bear further mention:

Area I: Related activity courses

The proposed regulations define “activity courses” and “related activity courses” as follows:

55000(a) “Activity course” means a physical education course or a visual or performing art course in music, fine arts, theater or dance, in which active participatory experience in individual study or group assignments is the basic means by which learning objectives are obtained.

55000(v) “Related activity courses” are those courses with similar primary educational activities in which skill levels or variations are separated into distinct courses with different student learning outcomes for each level.

The definition of “activity courses” is narrower than what we have historically used, and is the basis for the removal of repeatability from the longer list of disciplines on the previous page (e.g., Auto, Broadcasting, etc.).

The definition of “related activity courses” would seem to apply to many courses in:

- Dance (e.g., DANC 130A/B/C Beginning/Intermediate/Advanced Jazz Dance)
- Fine Arts (e.g., ART 140A/B/C Beginning/Intermediate/Advanced Painting)
- Physical Education (e.g., PE 242A/B/C Beginning/Intermediate/Advanced Volleyball)

While we would no longer be able to designate those courses as “repeatable” per se, we are allowed to let students enroll in these related activity courses a maximum of four times, with each enrollment that culminates in a grade or a W counting towards that limit.

The practical effect would seem to be that, while we can't designate the courses as repeatable, we would use the "repeatability" feature of Banner to implement the four-enrollment limit. We should ask for clarity on this.

There's also a lack of clarity about whether we would be allowed to let students re-enroll in activity classes that are not broken into multiple levels, or what would happen if a student placed directly into the intermediate level. It's also unclear what would be considered "related".

While the language also covers courses in music (e.g., MUS 10A/10B Beginning/Intermediate Voice), it is likely that we will be able to designate those courses as repeatable based on transfer applicability. The language also discusses courses in Theater, but it does not appear that we have these courses broken into multiple levels.

Area II: Significant Lapse of Time

Our current policy allows students to petition to repeat a course based on a "significant lapse of time", and empowers department chairs to determine what would constitute "significant". The proposed policy would significantly curtail this policy, in several ways:

- In most situations, the significant lapse of time would need to be at least 36 months
- We would need to have one of the following specific justifications for the repetition:
 - The district has properly established a recency requirement, or
 - Another institution of higher education to which the student seeks to transfer has established a recency requirement which the student will not be able to satisfy without repeating the course in question, or
 - If an employer mandates an employee repeat a course as a direct result of a substantiated change in industry standards, such repetition may occur more frequently than every 36 months.

Apportionment Limits

The proposed regulations would limit the apportionment we could claim as follows:

Situation	Apportionment Limitation
Student enrolls, gets satisfactory grade	One enrollment, unless covered by one of the following situations
Student enrolls, gets unsatisfactory grade or withdraws, and re-enrolls	Maximum of 3 enrollments, any combination of grades and W's.
Student allowed to re-enroll based on significant lapse of time or extenuating circumstances	1 additional enrollment

Situation	Apportionment Limitation
Student allowed to re-enroll based on: <ul style="list-style-type: none"> • Legally mandated training requirement • Special course for students with disabilities • Cooperative work experience • Military Withdrawal (MW) • Students withdrawing as a result of discriminatory treatment 	All enrollments
Students enrolling in repeatable courses	Four enrollments
Students enrolling in related activity courses	Four enrollments
Intercollegiate athletics	350 hours per fiscal year: 175 hours for the sport, and 175 hours for conditioning or skill development

We have some ability to allow students to enroll beyond these limits, but we could not claim apportionment for those enrollments.

Additional Questions

1. The proposed regulations state that we must “retain supporting documentation that verifies the CSU or UC sequence of transfer courses requirement.” What would be the nature of this documentation? Would this documentation need to show that repetition of the course is required, or would the transfer applicability of the course be sufficient to justify repetition?
2. Would there be a documentation requirement for the employer-mandated clause for significant lapse of time?