

HARTNELL COMMUNITY COLLEGE DISTRICT

AP 4021 Establishing, Revitalizing, or Discontinuing Academic Programs

References: Education Code Section 78015(a)(1), Title 5, Section 51022, 53200, 53203(d)(1), 55130, : *ASCCC Program Discontinuance: A Faculty Perspective, Revisited*; ACCJC Standard II.A.15, BP/AP 2510

Hartnell College is committed to supporting programs that fulfill its mission, vision, and support the educational needs of its students and the community. Pursuant to Title 5, Section 51022(a), the governing board shall adopt and carry out policies for the initiation, modification or is continuance of programs. Because of the impact of initiating or discontinuing a program, procedures must follow a careful and extensive review of the program's status in relation to the overall educational mission of the Hartnell Community College District. The initiation of a new program or the discontinuance of an existing program shall not be driven merely by budgetary considerations.

The recommendations of the ASCCC and Hartnell Board Policy 2005 states that the Governing Board and the administration of Hartnell College will "consult collegially" by relying primarily upon the advice and judgment of the Academic Senate when developing policies and procedures on academic and professional issues. These recommendations are reflected in the development of the procedures to follow.

Definitions:

An academic program is defined as an organized sequence of courses leading to a defined objective, a degree, certificate, diploma, license, or transfer to another institution of higher education (Title 5, Section 55000). For the purposes of these procedures, "program" shall refer to organized sequences of courses leading to the following transcribed awards: AA, AS, AA-T, AS-T, and Certificate of Achievement.

For sequences of noncredit courses leading to Certificates of Completion or Certificates of Competency and for other non-transcribed, locally defined certificates, the impact of initiation or discontinuance is much less; Curriculum Committee review processes are sufficient for initiation or discontinuance in these instances.

Program discontinuance is the termination of an existing BS, AA, AA-T, AS, AS-T or Certificate of Achievement when doing so will leave no degree or certificate offered in that discipline. Curriculum Committee review processes are sufficient for initiation or discontinuance in the instance when deleting a degree or certificate will not result in the discipline having no degree or certificate offered in that discipline. These procedures are not intended to include the replacement of an existing degree with an approved (C-ID/Transfer Model Curriculum) degree for transfer (AA-T or AS-T). In these instances, Curriculum Committee review processes are sufficient for initiation and/or discontinuance. For example, the deletion of an AS degree in Chemistry after the addition of an AS-T degree would be proposed by the department and reviewed by the Curriculum Committee without invoking the program discontinuance process. Likewise, the deletion of an outdated

Certificate of Achievement in Computer Science when an Associate Degree and/or other Certificates of Achievement will remain in existence would be proposed by the department and subject to Curriculum Committee review without invoking the program discontinuance process.

Program establishment refers to the process of proposing and developing a new **Associate** Degree or Certificate of Achievement. These procedures do not apply to modifications of existing programs or development of programs (such as Associate Degrees for Transfer) where a large body of the curriculum already exists and little or no additional outlay of funds is anticipated. The procedures also do not apply to noncredit Certificates of Completion or Certificates of Competency or to non-transcribed, locally defined certificates.

Program revitalization is an alteration to an existing program (**Associate** Degree or Certificate of Achievement) that includes a written plan documenting intervention strategies designed to improve the viability and responsiveness of the program. Such strategies may include specific outreach projects including: activities designed to recruit new students, the development of articulation agreements with transfer institutions, alterations in the scheduling of program courses, curriculum revisions and/or development, faculty retraining, investment in updated equipment, or other changes supported by annual or comprehensive program review and college strategic planning processes. These procedures do not apply to noncredit Certificates of Completion or Certificates of Competency or to non-transcribed, locally defined certificates.

Program evaluation committee is a College ad hoc committee tasked with reviewing data and making recommendations relevant to the establishment, modification, revitalization, or discontinuance of an academic program.

Program viability and vitality: A program is *viable* if it demonstrates itself to be capable of functioning adequately in terms of serving sufficient numbers of students effectively and *vital* if it shows the capacity to continue serving students at the same or increased levels of production, effectiveness, and relevance as compared to standards set by the institution.

De facto discontinuance is the unofficial discontinuance of a program, intended or unintended, that is caused from actions that result in the reduction of course sections within that program or from any other institutional or administrative action, thereby rendering program completion impossible or improbable. Such actions may result from the loss of appropriate faculty, staff, facilities and/or resources that affect critical courses or services for a program.

Program suspension is the suspending of courses and services related to the program for a period of one semester to two years.

ESTABLISHING NEW PROGRAMS (**Bachelor's Degrees**, Associate Degrees and Certificates of Achievement)

In order to ensure an orderly and coordinated development of instructional programs that will serve the needs of students and the community, a process for developing new programs is necessary especially when additional college resources will be required to support the new program. Included in this discussion are grant-funded programs that create new academic programs that may be funded initially by outside resources but eventually requiring funding from

the college general fund.

Initial ideas for new programs may come from a variety of sources including faculty, grant- seeking activities, community outreach, environmental scanning, and the annual and comprehensive Program Review and Assessment process. Special attention must be given to the impact of program initiation on existing programs, support services, staff and overall college functions. The need for a new academic program should be reflected in the college strategic planning processes.

Program Establishment Process for Associate Degrees and Certificates of Achievement

The process for establishing a new program typically includes four phases: 1) program proposal and concept development, 2) internal review, 3) curriculum development, and 4) local, state and regional program approval leading to implementation.

1) Program proposal and concept development is the initial stage of development intended to help the program initiator to develop a clear and comprehensive *Program Proposal Request and Narrative*. The program initiator works in collaboration with faculty, the area dean, community experts and potential employers. The curriculum committee chair, articulation officer, dean of Institutional Planning and Effectiveness and other college resources may contribute to this primary planning process. The resultant *Program Proposal Request and Narrative* should contain a clear description of the proposed new academic program and include the following elements:

- description of program, background and rationale, community need
- appropriateness to College Mission, Vision and strategic planning goals
- the program's position within the College
- a comprehensive cost-benefit analysis that includes impact to existing faculty and programs, need for resource allocations, capital outlay, space, and facilities including library and learning resources
- staffing issues (projected faculty needs, classified support, designation of program director, availability of qualified individuals)
- identification of minimum qualifications and faculty service area(s) for faculty teaching in proposed program
- local market data and/or industry and community needs
- industry and advisory committee recommendations and support (CTE programs)
- creation of an advisory committee (CTE programs)
- program support issues (articulation, availability of transfer programs, student support services)
- need for regional or state accreditation or approval and laws/regulations that pertain to the program
- similar programs within the state and near to college service area
- anticipated enrollments and completion rates; student selection criteria and fees
- external funding sources, principal investigator or project director, duration of funding (if grant-funded)
- program goals and student learning outcomes
- proposed catalog description, program requirements and proposed list of courses (create a catalog page and proposed sequence of courses)

- research describing the structure and content of similar programs at other college institutions and their enrollment trends
- any challenges that must be addressed for the program to be successfully launched

2) **Internal review:** At this stage, the faculty initiator(s) present(s) the *Program Proposal Request and Narrative* to the Academic Senate for initial evaluation and recommendation for advancement. If the Academic Senate recommends advancing the program for comprehensive evaluation, it will inform the Vice President of Academic Affairs. The Vice President of Academic Affairs will convene a program evaluation committee to evaluate the impact of the program upon the College.

a) **Convening a Program Evaluation Committee (PEC) for a New Bachelor's Degree, Associate Degree or Certificate of Achievement:** Upon the recommendation of the Academic Senate, the Vice-President of Academic Affairs will convene a program review committee with the following membership:

- The Vice-President of Academic Affairs as co-chair
- Academic Senate President or designee as co-chair
- 1 Dean from the program discipline area
- 1 Dean from another discipline area
- 1 faculty member who teaches in the discipline area or a related discipline area recommended by the program initiator and appointed by the Academic Senate
- The program initiator (non-voting member)
- 1 student selected by the Student Senate

In addition, the following resource personnel may attend when requested (non-voting):

- Articulation Officer or academic counselor
- Dean, Institutional Planning and Effectiveness
- Vice-President of Student Affairs or Designee
- Vice-President of Administrative Services or designee
- Other college personnel as deemed necessary

The responsibilities of the co-chairs of the program review committee for a new academic program will include the following:

- Maintenance of objectivity and integrity during the entire process
- Consultation with college resource personnel and other appropriate referral sources
- Minutes recording decisions for each meeting
- The production of a written recommendation report that will specify the outcomes of the committee's decisions and make specific recommendations for action

b) **Program Evaluation Committee Review:** The faculty initiator(s) will present the proposed program to the Program Evaluation Committee. Following a presentation by the faculty initiator(s), the Program Evaluation Committee will conduct a thorough review of the *Program Proposal Request and Narrative*. The considerations for program initiation must include qualitative and quantitative components in order to have a fair and complete review leading to an informed recommendation about the program. These components are

detailed below:

Qualitative Components are based upon the mission, vision and strategic goals of Hartnell College and on access and equity for students. These include (but are not limited to):

- the balance of college curriculum to include an appropriate mix of basic skills, career-technical and transfer courses appropriate to the community college mission and community needs
- the development of the “whole student”
- the perceived quality of the program
- any constraints that have affected enrollments in other similar programs in the state
- the duplication or uniqueness of the program within the College service area and the existence of equivalent programs in the surrounding area
- support and recommendations of the advisory committee (CTE programs)
- the ability of students to complete their degrees or certificates in a timely fashion and transfer to universities

Quantitative Indicators include, but are not limited to:

- projected enrollment trends
- number of faculty and support staff needed
- capital outlay and supplies needed
- frequency of course/section offerings
- projected demand for the program in the future and labor market demand (as applicable)
- potential employment placement rate of students in the job market over the next 3-5 years as estimated by market analysis for the college service area and state

c) **Program Evaluation Committee Recommendation Report:** The Program Evaluation Committee will issue a written report and recommendation to the faculty initiator(s), Academic Senate, Curriculum Committee, Academic Affairs Council, College Planning Council, and Vice President of Academic Affairs based upon the analysis of the *Program Proposal Request and Narrative* and consideration of the qualitative and quantitative factors outlined above. The evaluation committee’s report must include the following:

- a recommendation to proceed or discontinue steps to establish the new program
- a summary of the reasons for the recommendation
- an assessment of the recommendation’s impact on the balance of the college curriculum, budget, and consideration of the impact on students, faculty and staff (if a positive recommendation results)
- community and industry partnerships established as a result of program implementation

3) **Curriculum development:** If the Program Evaluation Committee recommends the program be advanced for curriculum development, faculty initiator(s) complete the development of program curriculum. With guidance from the curriculum chair and dean, the faculty initiator(s) complete(s) all course outlines and catalog materials for review and approval by the curriculum committee. The curriculum chair also guides in the development of materials needed for

submission to the Chancellor's Office and (for CTE programs) the Regional Occupational Consortium. A CTE Program may be submitted to the Regional Occupational Consortium prior to or at the same time as submission to the Curriculum Committee. Upon successful approval of all program elements by the Curriculum Committee, and recommendation by the Regional Occupational Consortium, the program and courses will be submitted by the Office of Academic Affairs to the Office of the Superintendent/President. Provided adequate resources have been identified to support the implementation of the program, the program and courses will be placed on the agenda of the Board of Trustees for approval consideration.

- 4) Local, State and Accrediting Body Approval:** Once governing board approval is obtained, program application materials may be forwarded to the Regional Occupational Consortium (for CTE programs) and Chancellor's Office for approval. Upon Chancellor's Office approval, notification of the Accrediting Commission for Community and Junior Colleges (ACCJC) may take place.

The Evaluation Process for Existing **Bachelor's Degree**, Associate Degree or Certificate Programs
The purpose of the program evaluation process is to perform a critical review of a program, considering all relevant data and research, and provide a summative evaluation of the program's viability. Based upon this comprehensive review, the program evaluation process will generate a recommendation for a further course of action: (1) Program continuance, with no significant recommendation for change, (2) steps that may be considered to revitalize the program, (3) suspension of the program or (4) discontinuation of the program. The procedures for modifying or discontinuing existing programs are separate from but reliant upon the annual and comprehensive program review process and college strategic planning.

When a program's vitality and/or viability are in question due to trends noted through the annual or comprehensive program review process and has demonstrated the need for further review for possible revitalization or discontinuance, the following steps will be taken:

- 1) Identification:** An at-risk program may be identified by a member of the discipline, the program's academic Dean, the Vice President of Academic Affairs, or the Academic Senate through the annual and comprehensive program review process. An at-risk program may also be identified when co-chairs of the College Planning Council become aware of long-term planning that may severely impact a program. On the basis of the criteria listed below, a *Request to Initiate Program Revitalization, Suspension, or Discontinuance* will be presented to the Academic Affairs Council and the Academic Senate.

Criteria (multiple indicators are required):

- Declining market/industry demand
- Advisory Committee or external state regulatory agency recommendation
- Decreasing enrollment trends (low or decreasing WSCH/FTEF)
- Poor term-to-term persistence for those students in the program major
- Outdated curriculum
- Outdated equipment and/or facilities and replacement creates a financial hardship for the College
- Poor rate for student achievement of program goals (e.g. completion rate,

- numbers of degrees and certificates, job placement)
- Decline in importance of program outcomes to related disciplines (applies primarily when discipline does not offer a degree or certificate)
- Change in transfer requirements and/or declining university transfer trends
- Insufficient frequency of course offerings to assure reasonable opportunity for completion of the program
- Lack of available resources including qualified program faculty
- Poor success and retention within program courses
- Unavailability of the transfer major
- Program creates a financial hardship for the College

The Request to Initiate Program Revitalization, Suspension, or Discontinuance must be informed by the content and data analysis of annual and/or comprehensive Program Planning and Assessment Review and Action Plans or other objective data analysis that supports the cited criteria. Criteria are compared with statewide norms for the discipline and local data over the last three to five years.

2) Review of Request to Initiate Program Revitalization, Suspension or Discontinuance: The request form will be presented as an agenda item to the Academic Affairs Council and Academic Senate for consideration. If the Request to Initiate Program Revitalization, Suspension, or Discontinuance is supported by either body, a Program Evaluation Committee will be convened to further evaluate the program, review the analysis and data presented at the Initiation of the Request and make recommendations for the continuation, revitalization, or discontinuance of the program. In the event that either Academic Affairs Council or Academic Senate fails to support the request, that body should present its decision, along with supporting evidence, to the Program Evaluation Committee, for consideration. The initial review by the Program Evaluation Committee will determine whether to move forward with the process or, if it is determined that there is no cause for further action, to stop the process and allow the program to continue, without intervention.

3) Convening a Program Evaluation Committee. Following a decision to move forward with the request for program revitalization, suspension, or discontinuance, the Vice-President of Academic Affairs will convene a program evaluation committee with the following membership:

Member	Voting	Non-voting
The Vice-President of Academic Affairs as co-chair	X	
Academic Senate President or designee as co-chair	X	
1 Dean from the program discipline area		X
1 Dean from another discipline area	X	
1 faculty member who teaches in the program (or academic director)		X
Curriculum Chair or designee	X	
1 faculty member who teaches in a related discipline area*	X	
1 faculty member who teaches in a non-related discipline area*	X	
1 student selected by the Student Senate	X	
*appointed by Academic Senate		

In addition, the following resource personnel may attend when requested (non-voting):

- Articulation Officer or Academic Counselor
- Dean, Institutional Planning & Effectiveness
- Vice-President, Student Affairs or designee
- Vice-President of Administrative Services or designee
- Other college personnel as deemed necessary

The responsibilities of the co-chairs of the Program Evaluation Committee include the following:

- maintenance of objectivity and integrity during the entire process
- consultation with college resource personnel and other appropriate referral sources
- minutes recording decisions for each meeting
- the production of a written Recommendation Report that will specify the outcomes of the committee's decisions and make specific recommendations for action and timelines

4) Program Evaluation Committee Review: The Program Evaluation Committee will conduct a thorough review of the program that addresses, but is not limited to the criteria listed above. The discussions concerning any specific program considered for discontinuance must include qualitative and quantitative components in order to have a fair and complete review leading to an informed recommendation about the program. These are detailed below:

Qualitative components are based on the Mission, Vision, and goals of Hartnell College and on access and equity for students. These include (but are not limited to) the following:

- the balance of college curriculum to include an appropriate mix of basic skills, career-technical and transfer courses appropriate to the College mission and community needs
- the development of the "whole student"
- the quality of the program and how it is perceived by students, articulating universities, local businesses and industry, and the community
- the program's curriculum, teaching and evaluative methods as compared with other programs outside the District or industry standards
- previous steps taken by program faculty to strengthen the program
- constraints that have affected program enrollment and other productivity measures
- the duplication or uniqueness of the program within the College service area and the existence of equivalent programs in the surrounding area
- employer satisfaction and information on "job-outs"
- the effect of potential discontinuance on students and other programs
- the ability of students to complete their degrees or certificates or to transfer to universities
- the potential for a disproportionate impact on diversity at Hartnell College

Quantitative Indicators are based upon sufficient institutional research capability to provide longitudinal data about student enrollments, student success, and, if appropriate, work force needs. Data used should be based on trends over time (typically three to five years) and should relate to program goals as well as the mission of Hartnell College. The quantitative indicators reviewed to inform the discussion on program discontinuance may include but are not limited to:

- enrollment trends over a sustained period of time
- productivity (WSCH/FTEF) data over the past 3-5 years
- retention and success rates (significantly below the college average) of students within the program
- term-to-term persistence (significantly below state-wide averages for the discipline and the college average) of students within the program
- number of degrees or certificates awarded (where applicable) as compared with state-wide averages for the discipline over the last 3-5 years
- number of actual transfers to UC, CSU or private 4-year institutions
- number of transfer-ready students
- frequency of course/section offerings
- placement rate of students in the job market over the past 3-5 years
- projected demand for the program in the future and labor demand (as applicable)

Discussion Guidelines: The discussion of program discontinuance must consider all parties potentially affected by the decision: faculty, staff, administrators, students, advisory committee members, employing businesses and industry, and the community. Discussion of program discontinuance will be conducted in public, open meetings for which the dates, times, and locations will be published in advance. Discussions will be conducted using the best practices for meeting facilitation (including the establishment of voting procedures for the committee in reaching a recommendation). Minutes will be published to reflect outcomes of discussions.

- 5) **Program Evaluation Committee Recommendation Report:** The Program Evaluation Committee will issue a written report and recommendation to the Academic Senate and Academic Affairs Council based upon the analysis of qualitative and quantitative program data. The Committee's report must include the following:
- a recommendation for the program's continuance, revitalization, suspension, or discontinuance
 - a summary of the reasons for the recommendation
 - a summary of the process used by the program evaluation committee
 - an assessment of the recommendation's impact on the balance of the college curriculum, budget, and consideration of the impact on program students, faculty and staff
- 6) **Possible Recommendations of the Program Evaluation Committee:**
- a) **Program continuance:** the program may be recommended to continue without any qualifications or modifications
 - b) **Program revitalization:** the program may be recommended to continue with a plan for revitalization. The plan may include specific interventions designed to improve the viability and vitality of the program. Specific goals and a schedule set for review of the progress towards these goals will be developed jointly by the program faculty and the administrator responsible for the program. Examples may include:
 - i) A plan of action to enhance the performance and effectiveness of the existing program (for example, establishing training/professional development for faculty and/or curriculum changes or updates).
 - ii) A recommendation to restructure the existing program for greater effectiveness, including expanding or reducing the program.

- iii) A recommendation to develop a new program from the existing program.

In order to ensure the greatest chance of success, the revitalization process will be allowed to run its full course, per the timeline developed by the PEC and program faculty: No new Request to Initiate Program Revitalization, Suspension, or Discontinuance will be entertained, while a program is currently undergoing revitalization. Any program in revitalization is still subject to annual program planning and review processes.

- c) **Program suspension:** A program suspension plan must include actions to be taken during the identified period of suspension with expected outcomes and an implementation timeline. The plan must include provisions for students already enrolled to complete their education in a timely manner with a minimum of disruption. The period of suspension may range from one semester to a maximum of two years. If the program cannot be reinstated at the end of the specified time period, the program must be reviewed again in accordance with criteria established for program discontinuance.
 - d) **Program discontinuance:** A recommendation to discontinue a program will occur when, after a full evaluation study, it is concluded that it is no longer in the best interest of the College, its students, and the larger community for the program to continue. With few exceptions, a recommendation for discontinuance will not be made without first recommending actions to revitalize the program. In most cases, a recommendation to discontinue would only follow failed attempts at modifying or strengthening the program or compelling evidence to indicate that this is not the best use of College resources. Any recommendation for program discontinuance must include the criteria used to arrive at the recommendation. The Program Evaluation Committee recommendation report for program discontinuance will include the following:
 - i) A detailed plan and recommended timeline for phasing out the program for discontinuance with the least impact on students, faculty, staff and the community.
 - ii) A comprehensive cost-benefit analysis that includes impact to existing faculty and programs, including resources, space/facilities, and the program's position within the College.
 - iii) An impact report explaining how phasing out the program for discontinuance will affect students, faculty, staff, and the community based upon program analysis data.
 - iv) Non-monetary impacts on the college (community and industry partnerships)
 - v) Recommendations for how currently enrolled students may continue their program of study or a plan for students to meet their educational objectives through alternative means. Students' catalog rights will be maintained and accounted for in allowing them to finish the program.
 - vi) The requirements of collective bargaining for faculty and staff, including policies for reduction in workforce and opportunities for retraining of faculty and staff.
- 7) **Implementation of Program Evaluation Committee Recommendations:** The co-chairs of the Program Evaluation Committee will present the report and recommendation to the Academic Senate.
- a) The Academic Senate will make a recommendation to either support or not support the recommendation of the Program Evaluation Committee. Recommendations to strengthen and

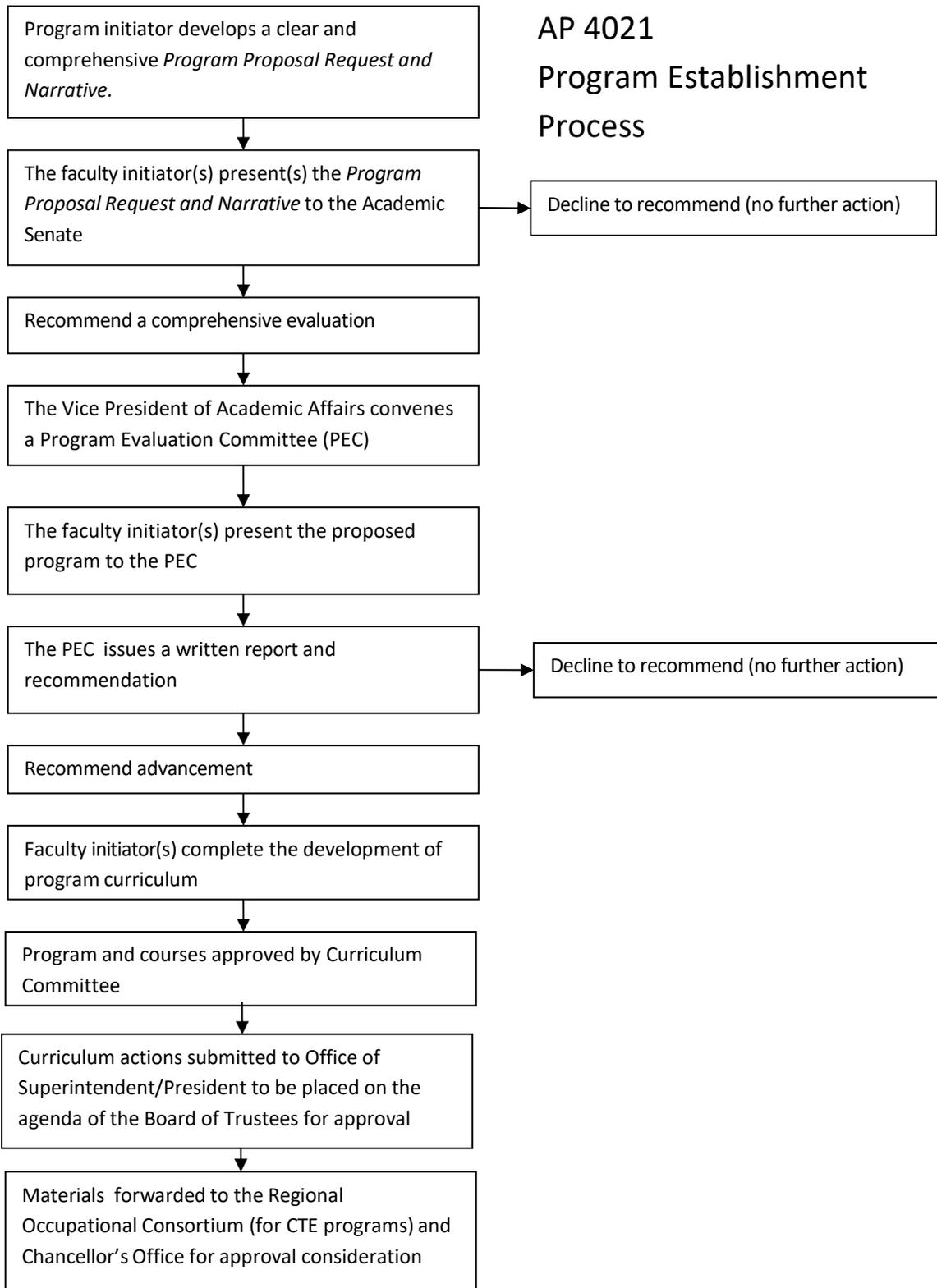
revitalize a program will be implemented provided resources are identified for any recommendations that require expenditure of District funds. The recommendation of the Academic Senate will be forwarded to the Vice President of Academic Affairs, the Dean responsible for the program, and the faculty members assigned to the program.

- b) The Superintendent/President will take forward the recommendation to the Board of Trustees. Unless there are compelling reasons or extenuating circumstances, the Board of Trustees will accept the recommendation of the Academic Senate. If the Board of Trustees does not accept the recommendation of the Academic Senate, the Board of Trustees, upon request, will provide a written explanation for not accepting the recommendation of Academic Senate.

De Facto Program Discontinuance and Program Suspension: De facto program discontinuance is the unofficial discontinuance of a program that may be caused from actions that result in the reduction or elimination of course sections within that program or from any other institutional or administrative action that makes program completion impossible or improbable. Such actions may result from the loss of appropriate faculty, staff, facilities, program accreditation and/or loss of other resources that affect critical courses or services for a program. De facto program discontinuance will be determined by the Superintendent/President in consultation with the Academic Senate and the Vice President of Academic Affairs and a recommendation will be placed before the Board of Trustees for approval consideration.

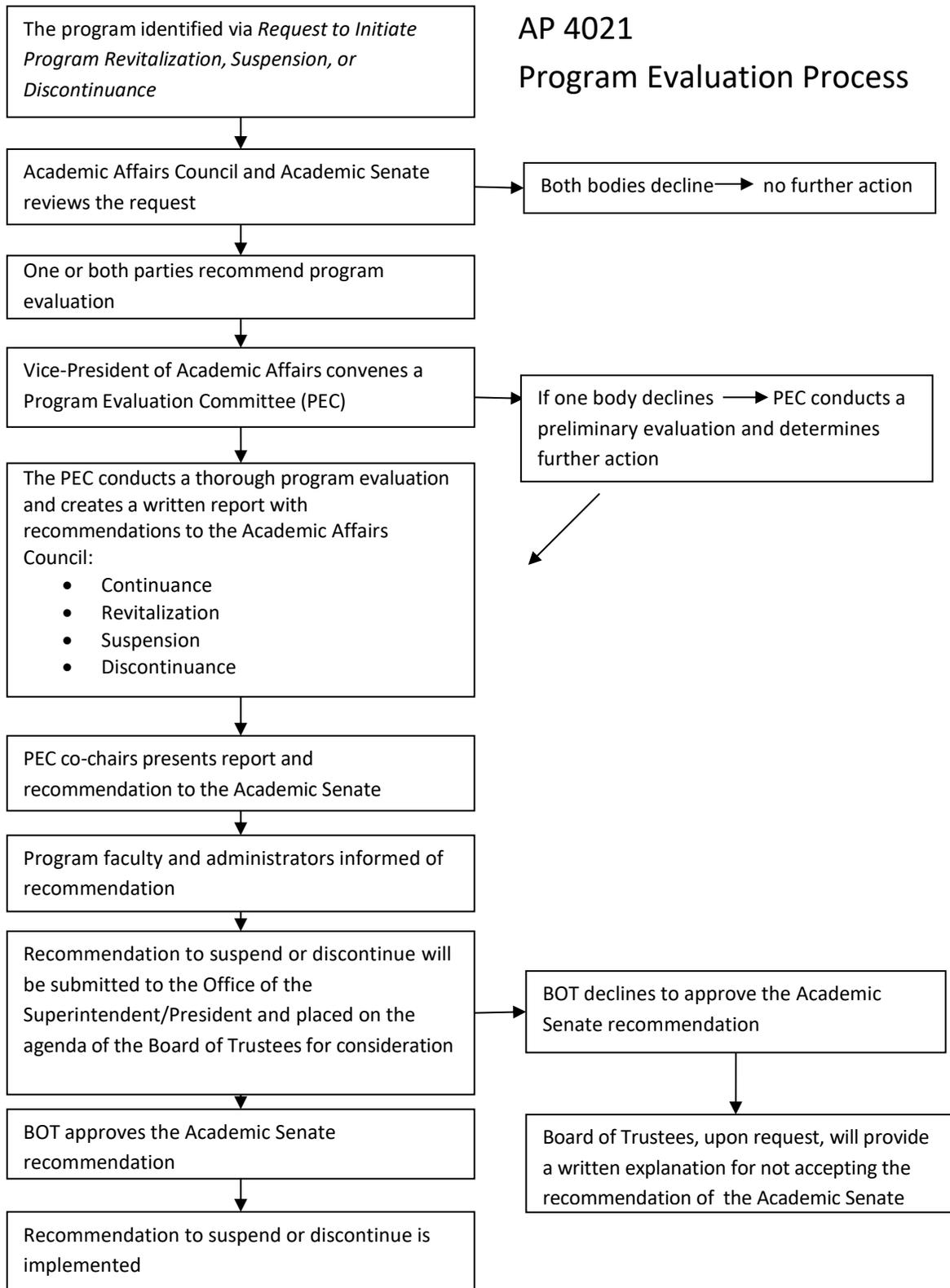
Approved by Superintendent/President: November 11, 2014
Rev: 5/15/18; 12/2/20

AP 4021 Program Establishment Process



Note: Program initiation will also depend upon identifying appropriate levels and sources of funding.

AP 4021 Program Evaluation Process



Note: Program modification will also depend upon identifying appropriate levels and sources of funding if needed.

**HARTNELL COMMUNITY COLLEGE DISTRICT
BOARD POLICY AND PROCEDURE
ROUTING/TRACKING FORM**

Review and consideration to approve by the various governance groups is requested Yes No Courtesy Review

Policy/Procedure # _____ Policy/Procedure Name _____

New Revised Replaces existing policy/procedure: _____

New policy/procedure or revisions initiated/proposed by: _____

Reason for new policy/procedure or revisions: _____

Reviewing Group	Date Out	Forward by
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Routed to

Academic Senate President _____

HCFA President _____

CSEA President _____

L-39 Chief Steward _____

Hartnell College Faculty Association

Date of Action: _____

Recommend approval Recommend approval with changes Do not recommend approval

Comments:

Academic Senate

Date of Action: _____

Recommend approval Recommend approval with changes Do not recommend approval

Comments:

CSEA

Date of Action: _____

Recommend approval Recommend approval with changes Do not recommend approval

Comments:

L-39

Date of Action: _____

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Comments:

_____ **Council** Date of Action: _____

Recommend approval Recommend approval with changes Do not recommend approval

Comments:

_____ **Council** Date of Action: _____

Recommend approval Recommend approval with changes Do not recommend approval

Comments:

_____ **Council** Date of Action: _____

Recommend approval Recommend approval with changes Do not recommend approval

Comments:

**Superintendent/President
Executive Cabinet** Date of Action: _____

Recommend approval Recommend approval with changes Do not recommend approval

Comments:

First Reading Second Reading

Board of Trustees _____

Approved Approved with changes Not approved

Comments:

ANTICIPATED TIMELINE
Board of Trustees first reading to occur on _____
Board of Trustees consideration to occur on _____

Additional Comments: