

Constituent Universities

Appalachian
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East Carolina
University

Elizabeth City
State University

Fayetteville State
University

North Carolina
Agricultural and
Technical State
University

North Carolina
Central University

North Carolina
State University
at Raleigh

University of
North Carolina
at Asheville

University of
North Carolina
at Chapel Hill

University of
North Carolina
at Charlotte

University of
North Carolina
at Greensboro

University of
North Carolina
at Pembroke

University of
North Carolina
at Wilmington

University of
North Carolina
School of the Arts

Western Carolina
University

Winston-Salem
State University

Constituent High School

North Carolina
School of Science
and Mathematics

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April 11, 2016

Mr. John W. Turcotte, Director
Program Evaluation Division
300 North Salisbury Street, Suite 100
Raleigh, NC 27603

Dear Mr. Turcotte:

Thank you for the opportunity to review and respond to the Program Evaluation Division's (PED) Review of the North Carolina Guaranteed Admission Program (NCGAP) Report. The UNC General Administration (UNC-GA) personnel involved in the review appreciated your staff's willingness to take the necessary time and effort to try and understand the complexity of the analysis. We are also grateful for the courtesy and professionalism they demonstrated throughout the time-restricted process.

Given the complexity of the analysis, UNC-GA and North Carolina Community College System (NCCCS) offices engaged the services of RTI International. As you and your team know, RTI International is one of the world's leading research institutes and provides research and technical services to government and businesses in more than 75 countries in such areas as health and pharmaceuticals, education and training, surveys and statistics, advanced technology, international development, and economic and social policy. RTI was critical to the analysis and the report team relied heavily on their expertise.

We acknowledge that important promising interventions have been made to improve transfer student success. We stand with our Community College partners to ensure the success of all students who desire a baccalaureate degree. We agree with your conclusion that calls on the General Assembly to monitor outcomes in both the NCCCS and UNC system going forward, in part because such effectiveness and outcomes data on several interventions mentioned in PED's review are not available, in part because some have been implemented within the last year and a half. Our commitment to rigorous analyses, using high quality data, is also demonstrated in one of our priority budget requests (\$3 million) for data-centric solutions for student success. If granted, this would substantially increase our capability to track how all students do and how different programs assist them in our ongoing goal of improved and timely degree completion.

Many shortcomings you highlighted in the joint study conducted by UNC-GA and the NCCCS office were well documented in the NCGAP report. As your team knows, all analytic approaches, identified variables, and available data were jointly determined in an iterative way with both System offices. As you noted, the only way to precisely estimate the impact of this policy is to conduct a randomized controlled trial (RCT), or random assignment research design. In an RCT, half of the participants are randomly assigned some intervention or service and the other half are not. These types of studies are most often used in medical research but are very rare in educational research due to ethical and other considerations. In the case of NCGAP, a RCT is/was not possible for ethical, feasibility and study duration (the study would be six years to assess the main outcome of interest – graduation rate) factors. Given both time and data limitations, the report's study design and statistical methods, vetted by two agency offices with RTI consultation, were the most appropriate.

The PED review cites flaws (summarized on page 1) that are presumed to affect the NCGAP report conclusions, but many of these flaws and the PED review's proposed improvements – ranging from inclusion of additional data information to impact of existing programs (e.g., career coaches, 2014 comprehensive articulation agreement [CAA]) – actually lack any data or analyses from PED to substantiate a positive impact from possible improvements. Some examples follow:

- In the category of flawed measures or exclusion of variables:
 - PED review points out that we could have included an additional 34 students who only had an ACT score (no SAT score) (p. 5), but does not report an analysis of the impact of including those 34 students.
 - PED review repeatedly states that important information not included in the NCGAP report limits the NCGAP report findings. Two examples include employment status of students and private loans (p. 6). The reason such information was not included is because the data were not available to us – e.g., UNC does not collect employment status on their applications. Again, no evidence is presented that inclusion of those two variables was actually possible or, if included, would indeed impact findings.
- Several comments in the PED review relate to the lack of consideration of NCCCS or joint NCCCS-UNC programs on the impact of those programs, but the PED review offers no data or analyses on those existing programs or impacts/costs of possible 'incentives' (e.g., access to university athletic events or university housing):
 - For example, several programs are stated in the PED review to have positive effects on students – NCCCS ACA course, Career Coaches, 2014 CAA – but no effectiveness or outcomes data/analyses are presented in the review to support those statements. In fact, on page 9, PED reports that the Career Coaches program is still 'under development'.
- Using different and unrelated metrics leads to different conclusions. For example, the PED review compares graduation rates of students who already completed community college work and transferred successfully to UNC with students just starting out as freshmen at UNC. That's like comparing the time of a runner in a half-marathon with another runner in a full marathon. In this case, PED argues that students graduate more quickly when they start as juniors rather than starting as freshmen, but that point is irrelevant to the NCGAP proposal, in which the relevant comparison is students starting as freshmen in one or the other system.

Finally, we understand your need, given time constraints, to divert from traditional protocol of allowing agencies to respond first to a review before releasing your review to a broader group. This, however, has limited our ability to engage fully our Board of Governors (BOG) since we received the review midday Friday, April 8th and asked for a response within 72 hours. We will continue our work with the BOG on this to provide them a more detailed response to your review at the Board meeting end week. Again, thank you for your staff's dedication and for the opportunity to review and respond to the Program Evaluation Division review.

Sincerely,



Junius J. Gonzales