March 17, 2023

Joint Legislative Audit Committee
Legislative Office Building
1020 N Street, Room 107
Sacramento, CA 95814

Dear Chair Alvarez,

Thank you for your interest and commitment to increasing the transfer rates of California Community College students to our state’s public four-year universities. The Board of Governors, the students, faculty, and staff at our 116 California Community Colleges, and I all share your interest in increasing baccalaureate degree attainment, and your concerns about the current barriers our students face, particularly around equity and regional access to four-year universities in our state.

As the Joint Legislative Audit Committee seeks to support our students, on behalf of our 116 California Community Colleges, I ask that you consider two changes to the scope of this audit.

1. **Expand the scope of the audit to understand the impact of recent investments and policy changes adopted by the Legislature by making the start date of the audit June 2024.** Our system is in the midst of implementing key legislative changes, including AB 928 and AB 1111 (the Student Transfer Achievement Reform and Common Course Numbering), which are intended to transform transfer. A 2024 start date will yield updated structures for transfer and support your vision to positively impact it.

2. **Advance a timely and accurate audit that includes UC and CSU data.** By including UC and CSU, the number of California Community College students who apply, are accepted, enroll, and ultimately complete a bachelor’s degree will be transparent, and provide critical information about existing transfer barriers for Californians. That type of data is held by the UC and the CSU, and it is critical to understanding equity and regional gaps in transfer.

These additions will provide the Legislature with a full picture of the maze that our students face when they seek to transfer and complete degrees. Below, we share in
detail how these additions will result in an accurate analysis of transfer in the state of California and a path forward to achieve the committee’s goal of increasing baccalaureate degree attainment that meets California’s workforce needs.

**Existing Legislative Priorities to Transform Transfer**

Several recent pieces of legislation are already generating important changes in how our system approaches transfer and are aligned with your stated goals. They include:

(1) **Assembly Bill 928 (AB 928)**, the Student Transfer Achievement Reform Act of 2021, created the [Associate Degree for Transfer Intersegmental Implementation Committee](https://www.ccsd.ca.gov/). With a timeline from 2022-2025, in 2023 this committee is tasked to provide the legislature with recommendations for:

- “Identifying annual goals for increasing transfer rates in California and closing racial equity gaps in transfer outcomes to be adopted by the state.”
- “Proposing a new unit threshold for STEM degree pathways that meet the requirements for admission to the California State University and the University of California.”
- “Reengaging Associate Degree for Transfer (ADT) earners who do not transfer or apply for transfer into a four-year postsecondary educational institution.”

Three groups were developed for more nimble evidence-guided deliberations and results around the intended goals of the legislation. In addition, in 2023 the statute tasks the Intersegmental Committee of the Academic Senates (ICAS) to “establish a singular lower division general education pathway.” An agreed upon framework is being vetted by constituencies and [status updates](https://www.ccsd.ca.gov/status) have been provided. Please note that the AB 928 Committee is not engaged in establishing or approving this pathway.

In 2024, the Committee will address other legislative directives by developing an ADT pathway communications plan, providing feedback for the review and update for the ADT website, establishing timelines and deadlines for the regular review of transfer model curricula, and planning for periodic analysis and creation of transfer model curricula responding to evolving workforce demands. Further, the California Community Colleges have been planning and will be implementing automatic ADT placement for declared transfer students on their student education plans.
(2) **Assembly Bill 1111 (AB 1111)**, the Common Course Numbering System, created the [Common Course Numbering Project](https://www.cccco.edu/ab-1111). With a timeline of 2021-2024, this project directs all community colleges to adopt a student-facing Common Course Numbering (CCN) system for all required general education (GE) and transfer pathway courses.

Since the passage of AB 1111, our system published a [CCN Landscape Scan](https://www.cccco.edu/ab-1111), and convened a CCN Task Force comprised of diverse and integral community college and intersegmental stakeholders. The CCN Task Force is charged with working collaboratively to develop a systemwide CCN implementation plan by December 2023. The implementation plan will be comprehensive (including implementation steps, timelines, resource needs) and considerate of the major factors necessary to fulfill the intent of the legislation – improving student transfer outcomes.

The current focus of the CCN Task Force is on identifying common course elements and associated CSU and UC transfer/articulation implications. The accompanying CCN implementation plan will coordinate local and statewide adoption efforts led by working groups focused on critical topics such as course alignment and technology infrastructure.

(3) **Assembly Bill 705 (AB 705)**, Equitable Placement, Support and Completion, amended the Seymour-Campbell Student Success Act of 2012 and authorized the Board of Governors to establish regulations governing the use of measures, instruments, and placement models to maximize the probability that a student will enter and complete transfer-level coursework in English and math. While demonstrating transformative results with improvements across all demographic groups for successful completion rates, post-AB 705 there were some implementation gaps with the underdevelopment of support courses and continuing equity gaps in completion at some colleges. To help close those gaps, the Chancellor’s Office provided clear and explicit direction to require colleges to evaluate and improve placement and support structures and processes (see Chancellor’s Office guidance here: [https://assessment.cccco.edu/ab-705-implementation](https://assessment.cccco.edu/ab-705-implementation)).

To help close those gaps, AB 1705 also clarified that students needed to not only have the option to enroll in essential gateway English and math courses, but that districts and colleges must ensure students’ entrance into, support in, and successful completion of these courses. Ensuring students’ successful completion of these...
gateway courses is a key lever for helping students complete their academic requirements and transfer. With an ongoing timeline of regular evaluation, professional development and technical assistance, this effort is a historic structural reform aligned to the Vision for Success, the Guided Pathways framework, and our diversity, equity, inclusion and accessibility (DEIA) call to action.

**Intersegmental Data to Fully Evaluate Transfer Pathways and Barriers**

Students successfully transfer from a community college to a public four-year university when the pathways are clear and open to them. This requires strong partnerships between their origin institution and destination institution. An incomplete picture of transfer that examines only the first and not the second can be misleading and researchers caution against it.\(^1\) Instead, state legislators around the country have successfully audited the transfer pathway using a systemwide audit (for a recent example, see Nevada’s audit). Successfully meeting your stated goals to identify and remove obstacles equitably will require that approach, engaging both the CSUs and UCs in the audit along with CCCs and taking both a regional and state perspective.

In addition to the leadership of the Campaign for College Opportunity, scholars from Wheelhouse have completed important work on transfer, which highlights the need to include CSU and UC in this effort. For example, their 2020 analysis stated that “students face barriers in the usability of the ADT across campuses and fields in the CSU.” They also indicated that many CSU applicants fail to report that they have earned ADTs, which speaks to the need for more outreach and information in the CSU recruitment, marketing, and admissions process (this is a need recognized by CSU leaders). Clearly, expanding access to ADTs at the CCCs will not be productive unless usability at the CSU is also enhanced.

Another key challenge which should be examined to enhance equity is that UC transfer requirements often do not align with ADT requirements. Wheelhouse

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\(^1\) For example, in its 2020 transfer report Wheelhouse researchers write “in this report, we focus mainly on CCC-CSU transfers, as that is the intended pathway for ADT earners. However, we note that many students who earn ADTs, and many students who transfer to CSU without an ADT, also considered transferring to another sector, such as the UC. Treating these transfer decisions and processes as separate could lead to a misleading and simplistic understanding of how structures and policies affect students’ decisions” (p. 14, bold added). The Aspen Institute and Community College Research Center’s Transfer Playbook specifically names the critical role required of four-year institutions in successful transfer pathways.
reported: “Like CCC to CSU transfer, transferring from a CCC to a UC has historically lacked statewide coherence and uniformity, which has made it complicated and difficult for students to navigate” (2020, p.17).

City College of San Francisco student Marjorie Blen got the support she needed from her community college but recently faced problems with her prospective destination institutions. EdSource reported, “Though she was applying for the same major — sociology — the requirements were different for each campus in the California State University and University of California systems. Blen described a “very, very discouraging” process of cross-referencing each school, each class and even each credit to make sure she was fulfilling all the requirements correctly.”

Liza Mejia finished her time at Crafton Hills College with an A- average despite raising kids as a single mom while in college. But the Hechinger Report says that her local CSU rejected her due to a convoluted paperwork requirement, almost derailing her progress to university. Only after her community college devoted additional staff time to resolving the challenge did Liza eventually enroll at UCLA.

Based on limited data the California Community College Chancellor’s Office has access to, nearly 30,000 community college students who were eligible and applied for admission to the UC2 and CSU3 in 2020 were not admitted. Available data shows that number has continued to grow. Insufficient capacity in the four-year public sector is another major challenge to the Vision for Success goals.

Given your clear commitment to data, another recommendation from Wheelhouse would be especially welcomed and help greatly in your efforts to improve transfer: “establish an integrated higher education data structure for a more comprehensive understanding of transfer pathways.” It is difficult to accurately identify obstacles using a single system’s data alone. The Transfer Playbook developed by the Aspen Institute and Community College Research Center notes that information on capacity

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3 Source: The California State University. (2021). New undergraduate transfers from California Community Colleges or other institutions. https://tableau.calstate.edu/views/FirstTimeFreshmanandCollegeTransfers/SummaryView?iframeSizedT oWindow=true&embed=y&render=true&showAppBanner=false&display_count=no&showVizHome=no
and student success data from universities must be part of the picture. This should include the following information from CSU and UC:

- Names of degree programs where “transfer students may face significant barriers to entry as a result of limited slots, high demand, resource constraints, or changed admission standards.”
- Approximate number of students affected by challenges in those degree programs.
- Percentage of transfer credits accepted overall.
- Percentage of transfer credits that are accepted toward particular majors.
- Transfer student grades in upper-level courses, overall and disaggregated by major or field.
- Number of years it takes transfer students to graduate, overall and disaggregated by major or field.

It is essential that these data are disaggregated by region. The Public Policy Institute of California (PPIC) writes that “Addressing regional disparities in transfer will be key to meeting the state’s and the community college system’s goals of eliminating equity gaps and increasing degree attainment, especially given pandemic-era disruptions. There are many reasons why community college students who want to transfer might be less likely to do so in some parts of the state. For some students, options for nearby four-year colleges may be limited, and financial barriers and insufficient aid can make it hard to move away from home.” Access to the UC is particularly inequitable by region, according to the PPIC’s analysis.

**Transfer Progress Under the Vision for Success**

The Vision for Success represented the California Community College system’s adoption of six goals seeking to ambitiously boost postsecondary attainment and reduce equity gaps within 5-years and completely eliminate regional gaps within 10 years. Our Board of Governors adopted these ambitious goals with a mindset that required us to take ownership of our outcomes and lead the structural changes that remove historical and deeply engrained barriers for our students.

Our system met the first goal, to increase completions by 20%, within three years, by 2018-19. In fact, over the five-year period, the number of completions increased by nearly 30%, with more than 149,200 students earning credentials. Our second goal, to increase transfers to UC and CSU by 35%, has not been fully achieved. As of 2019-20,
the system met almost half of that goal, and in 2021-22 we prepared 30,000 more students who met transfer requirements, but ultimately did not enroll at a UC or CSU.

Importantly, since 2016-17, the number of traditional associate degrees and associate degree for transfer (ADTs) earned by CCC students increased by more than 27% and 75%, respectively. Despite this substantial increase in ADTs (75% increase), as well as the increased level of preparation for transfer of California Community College students, admission rates and enrollment rates of students that apply have not grown in similar ways. In fact, admission rates to UC continue to be lower than they were prior to the Great Recession. Moreover, a growing proportion of ADT transfers do not have the guarantee laid out in SB 1440 (i.e., priority admission to a specific major at an individual CSU campus). In fact, as of 2020, nearly half of all ADT-matriculants to the CSU had to complete with conferred degrees without the guarantee. Moreover, the number of students transferring with no degree has been trending down since widespread implementation of the ADT.

In a recent report about transfer in our system, the PPIC noted that “academic progress towards transfer had already been improving before the pandemic started. That is, transfer-level unit accumulation and rates of milestone completion were increasing steadily for all fall cohorts from 2016 to 2019. Pre-pandemic reform efforts already underway across the community college system, such as the implementation of Assembly Bill (AB) 705, Guided Pathways and Associate Degree for Transfer, may explain such trends....equity-based department and classroom-level reforms have begun to take place across colleges, aiming to employ research-informed teaching strategies and create enhanced, student-centered learning environments for all students.... [These] seem to have limited the negative effects of the pandemic on already-enrolled students.”

**Moving Forward**

Our work continues to meet the *Vision for Success* goals and removing structural barriers remains critical. We share a common goal to increase student success, and our Board of Governors is in the middle of reviewing our goals and aligning timelines to the Governors Roadmap to the Future, which calls us to advance all of the Legislative transfer priorities mentioned above.

The global pandemic has added considerable challenges throughout higher education, affecting equity in both overall enrollment and the transfer pathway. For
example, many students and their families continue to struggle financially, managing
debt they incurred while schools were closed, and they were out of work. Key federal
supports that enhanced their ability to remain in school are gradually being pulled
back, affecting their housing and food insecurity. Moreover, many students are
struggling with mental health challenges. If we are going to support students through
this extraordinary moment, we must remain focused on building the future of
education in California, and we need your support. Additionally, our transfer partners
on all sides must be sufficiently resourced and accept the credits earned by our
students as they seek to transfer. This is why it’s so important to begin the audit in
June 2024, which will align with AB 928 Committee deliverables, and examine transfer
from an intersectional perspective, including the UC and CSU data related to
university access and bachelor’s degree completion.

Thank you for your consideration of these suggestions and your partnership to build
education systems where every Californian can succeed. Executive Vice Chancellor Dr.
John Hetts and Vice Chancellor David O’Brien will be in attendance to answer any
questions the committee may have.

Sincerely,

Daisy Gonzales, Ph.D.
Interim Chancellor

cc: Sen. Catherine Blakespear, Vice Chair
Members of the Joint Legislative Audit Committee
Wesley Opp, Chief Consultant
Tram Truong, Principal Consultant