

# Equitable Placement and Completion Improvement Plans

## Frequently Asked Questions

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### Pre-Transfer Courses

**Our college 'offers' a developmental course in mathematics, but our placement system does not require our students to take it before entering their transfer-level math courses. Do we have to complete a data addendum?**

All that continue to offer developmental or below transfer-level courses are required to complete all parts of the Improvement Plan, including the data addendum in order to demonstrate the effectiveness of the below transfer-level pathway for students who choose it.

**While colleges are potentially allowed to offer classes below transfer if we provide data, it is highly unlikely that this approach would result in better throughput, correct?**

Based on all the evidence collected to date, it's very unlikely that offering courses below transfer-level will maximize students' completion of transfer-level coursework within one year. However, the Chancellor's Office remains very interested in any evidence that colleges might have that would demonstrate alternative pathways to maximizing student completion of transfer-level coursework.

**Are colleges still allowed to create new pre-transfer level courses for Fall '22 that we do not yet have any data for but that we believe will be most effective?**

Not in an institution-wide way. There has been a substantial period of potential innovation dating back to the Basic Skills Outcome Transformation Grants. There continue to be opportunities to demonstrate the effectiveness of alternative pathways but, given the evidence to date, the effectiveness of such approaches should be first mapped out with a clear theory of action for why the new method will demonstrate greater effectiveness compared to previous approaches and then demonstrated as a pilot before scaling, with clear opportunities remaining for those students to choose transfer-level courses with appropriate support as an alternative.

**Does this mean that students can't voluntarily choose to enroll in a pre-transfer course?**

They may, but any college that chooses to continue to offer such courses and allow such enrollment must demonstrate the effectiveness of those pathways by completing the entirety of the improvement plan, including the data addendum.

**If a student specifically chooses to take a pre-transfer class, even after being advised about the effectiveness of the “transfer with support” model, what happens there? Is that a demonstrable need for a pre-transfer course, or do we not allow that student to enroll in pre-transfer? Thank you for the chance to have this Q&A, it's helpful.**

That does not constitute sufficient demonstrable need to offer the course. Enrollment, whether, voluntary, recommended, or required will need to be reported in the data addendum template and the effectiveness of continuing to offer such options will need to be demonstrated by the college. There are examples provided in the Improvement Plan form to assist colleges in developing policies to best address such situations.

**How do you prove the need for students to take pre-transfer courses?**

(and)

**For the minority who are not successful, how can colleges demonstrate the effectiveness of pre-transfer level courses?**

First, you would have to establish that those students are highly unlikely to successfully complete the transfer-level course, which constitutes a very small fraction of students in the California Community Colleges. No students outside of possibly those who haven't completed high school or who are in the very bottom of the distribution of performance of US high school graduates are likely to be in that category of students. Second, colleges then need to demonstrate that students that start in such below transfer-level courses are at least as likely to successfully complete the transfer-level course as similar students who enrolled directly in the transfer-level courses, particularly with support. The method for demonstrating the latter is part of the reporting process in the data addendum template.

**If the data addendum does not show that a pre-transfer level course is maximizing throughput, then we cannot offer those courses, right?**

(and)

**If the throughput of a college is not showing maximization, will the college be required not to allow pre-transfer level enrollment in an English/math sequence by fall 2022?**

That's correct. The expectation is that institutions that cannot demonstrate that a pathway that begins in below transfer-level courses does not at least match the successful completion of the transfer-level course within one year will wind down such courses prior to Fall 2022.

**How do we handle the report if math and English will differ in the pre-transfer offerings?**

(and)

**What if English and Math fall into different Option categories? Does the college have to do the more detailed plan option even if one of the disciplines might be under option 1 or 2?**

Any pre-transfer level course offerings require institutions to report under Option 3 and report using the Data Addendum, but the Data Addendum would only have to be completed for the discipline where enrollments below transfer-level would still be allowed or required.

**This is effectively eliminating the option for students in the CCC system to take pre-transfer level courses. Do you anticipate a strong push to repeal AB 705 once the public realizes that this is the case?**

It is not at all the case that the option for students to take pre-transfer-level courses is being eliminated, which has been clearly detailed in the materials and was reiterated in the webinar. Colleges are simply being asked to demonstrate the effectiveness of such approaches given the evidence to date suggesting that pre-transfer-level pathways do not maximize student completion of transfer-level coursework. The Chancellor's Office does not expect that the public will have any concern with us being required to prove that our practices are best for students, especially practices that historically have been used to force students to retake courses they've previously successfully completed and have done so disproportionately to underrepresented students of color and women.

**How would using pre-transfer-level petitions affect compliance with the law? Could you please provide more details about a sample petition system that would work? For example, could students who have failed a transfer-level math course (or who have enrolled and dropped out of a transfer-level math course) petition to take a pre-transfer-level math course? Or could any student petition at any time?**

Instituting a petition process is recommended to ensure students are aware of the potential detriment of the choice they are making. We will be releasing a memo and guidance on student communications and guidance in the new year based on the results of the AB 1805 forms & templates submitted by colleges in July. We will include a sample petition.

### **College-Level versus Transfer-Level**

**What is college-level vs transfer level? Is college-level the same as below-transfer?**

(and)

**It would be helpful to distinguish references to "transfer-level" and "college-level" courses -- especially related to the Intermediate Algebra requirement for the AA/AS.**

(and)

**Where can I find the definition of the difference between a "college-level" and a "transfer-level" math course? I looked in the glossary of terms and the other mentioned documents and I am not seeing definitions of these terms anywhere.**

Transfer-level and college level do not mean the same thing. In mathematics, courses one-level below transfer-level (CB21 = A, such as , e.g., intermediate algebra or geometry) are sometimes referred to as college-level courses in the California Community Colleges as they count towards the completion of the quantitative reasoning requirements for many local associate degrees but do not count towards the quantitative reasoning requirements required for transfer to a UC or CSU institution. Transfer-level courses in mathematics would be courses that fulfill the quantitative reasoning requirements at such

institutions. Since the change to associate degrees requiring transfer-level English for completion of an associate degree, there is no longer a distinction between college level and transfer-level in English.

As indicated above and as defined in the memo and data template, courses usually coded one-level-below-transfer (CB21 = 1) that meet local degree requirements for programs in which transfer-level coursework is not required in mathematics are college-level courses. Transfer-level courses are courses that are transferable in satisfaction of the quantitative reasoning requirements at UC or CSU does not satisfy programmatic requirements (e.g., an electrical technology program with contextualized math skills).

It is important to distinguish, however, between programs that have a quantitative reasoning requirement that is at the college-level (e.g., the degree or certificate only requires intermediate algebra, geometry, or similar for completion) that can be reasonably satisfied by a course that is a transfer-level mathematics course (e.g., statistics, college algebra, etc.). AB705 requires that students in such programs should also be provided access to transfer-level courses in mathematics (with support if necessary) and that their probability of completing the course at the transfer-level should be also be maximized. Programs with local degree requirements that are at the and that cannot be satisfied by a transfer-level courses should be reported on the college-level tab.

### **Can you describe multi-term transfer-level courses?**

A multi-term transfer-level course here refers to courses that were previous one term that have been stretched over two terms and in which both are required to be taken and completed for credit for completion of the requirement and only the latter (or some subset of the units) are transferable. A one term English composition course that has been stretch into two terms or a one term statistics course that has been stretched into two terms would both be considered a multi-term transfer-level course for these purposes. Colleges may not take previously existing transfer-level courses, stretch them into two terms in order to maintain development courses. Colleges should not be lengthening transfer-level course sequences and would be expected to report on such innovative curricular changes in the same way – by demonstrating that adding an additional transfer-level course, a very large and expensive intervention given both the direct and opportunity costs it has for students, leads more students to successfully complete the course that the prerequisite was added in front of.

### **Are co-requisite support courses considered below transfer-level or is it simply the main English or Math courses that should be considered below or at transfer-level?**

Corequisite courses will often be below transfer-level courses. However, students who are taking a transfer-level course with a below transfer-level support course are considered to be placed and enrolled at transfer-level.

### **Throughput Rate**

**Can you please clarify something you just said about when the calculation for throughput first starts...we have been basing it on the FTIC and completing that first year. But I think I heard you say something about first entering their program of study.**

For the purposes of compliance with AB705, colleges must maximize students' likelihood of completion within one year of their first course attempt in the discipline (i.e., for students who start in a fall term, colleges must maximize students' likelihood of completion of the transfer-level course by the end of the next summer term). This does not mean, however, that placements and enrollments in which students *could theoretically* complete the transfer-level course within a year is sufficient. Students' likelihood of completion within that time frame must be maximized and, to date, all evidence suggests that that is most likely when students are placed and initially enroll in a transfer-level course, with support if



necessary. For the purposes of completing the template, for a first time student who does not enroll in any English courses until the spring term of their second year, colleges would look through a winter term or intersession for completion of transfer-level English.

**The Student-Centered Funding Formula uses the first calendar year for new students to calculate throughput for English and Math. The AB705 analysis being described here starts the one-year clock when a student first enrolls in the discipline. These two methods of calculating throughput has caused some confusion at my college. I understand why we need the two methods, but is there any way to make this clearer across the system?**

The version of throughput for AB705 was based on providing the opportunity for colleges to demonstrate evidence that below-transfer-level placement and enrollment could lead to similar or higher levels of successful completion of the transfer-level course within one year of a student's entry into the discipline.

The version of throughput used for the Student-Centered Funding Formula was designed in that way in part to provide colleges clear incentives to help students enroll in and successfully complete transfer-level coursework in students' first year, given the association between their early completion and long-term student achievement measures (and in part because of mundane limitations created by the misalignment of annual funding cycles with student attendance patterns).

**What standard or threshold was used by the CCCCO to determine that "throughput was not maximized" and how is this seen from the data that was submitted by the colleges or the transfer completion dashboard?**

The standard has always been that the college can demonstrate that students placed into or who enrolled voluntarily in a below-transfer-level course are as or more likely to successfully complete the transfer-level course in the discipline as similar students taking the transfer-level course. In the absence of similar students at the transfer-level, the Chancellor's Office has used statewide comparison data (adjusting for differences in college demographics where cell sizes were sufficient to do so on the Validation of Practices templates submitted by the colleges). Colleges can easily conduct similar comparisons using the dashboard by selecting: 1) discipline in question 2) one year timeframe to completion 3) first attempt term = all, 4) the GPA Band disaggregation and then 5) comparing students that start at one-level below to students that start at transfer-level. If one does this for English in 2018-2019, you can see that the one-year throughput for students that start at transfer level is 45% for students with a HSGPA < 1.9, 59% for students with a HSGPA between 1.9 and 2.6, and 80% for students with a HSGPA  $\geq$  2.6 in 2019-2020. By comparison, for students that start one-level below transfer-level in English, their one-year throughputs are: 19% (HSGPA < 1.9), 30% (HSGPA  $\geq$  1.9 and < 2.6), and 43% (HSGPA  $\geq$  2.6). In each case, and in particular for students in the lowest band of high school performance (the only grouping that could be remotely plausibly argued to be highly unlikely to success in transfer-level English based on this evidence), students are much more likely to successfully complete the transfer-level course is they start there. If one would like to conduct one year comparisons for the most recent academic year, it is recommended to conduct the comparisons using Fall terms only as students in other terms will not yet have a full year of data available at the time of construction of the dashboard (which is why such bars in the bar graph are more lightly colored).

**Will throughput rates based on small number (which could be fluctuating greatly) be considered when checking throughput maximization?**

Throughput is calculated regardless of sample size, as noted in the template. This possibility, however, is one of the reasons that the Chancellor's Office has been examining and continues to carefully examining the results for students who place below transfer level *systemwide* as well as the pattern of

results across institutions (essentially providing over 100 samples of varying sizes) to see whether there is evidence that suggests below-transfer-level placement is likely to maximize students' successful completion of transfer-level courses within the first year of students' entry into the discipline. Neither the systemwide data nor any individual college data, large or small, show evidence of this to date, suggesting that there is low plausibility of small sample sizes accounting for the absence of evidence of throughput maximization. Given the overall systemwide pattern of data and the size of the observed difference, it's more likely that a small sample demonstrating throughput maximization would represent a false positive (e.g., incorrectly suggesting that a below-transfer-level placement maximized successful completion of the transfer-level course in one year) than a small sample demonstrating a failure to maximize throughput would represent a false negative (i.e. failing to observe an instance where below-transfer-level placements actually maximized student completion of the transfer-level course). That being said, the Chancellor's Office remains interested in any evidence of similar or greater effectiveness of enrollment that begins below transfer-level compared to students whose initial enrollment in the discipline is at transfer level.

**Does AB 705 track data for students who begin a transfer-level course but who withdraw from the course before the end of the semester (and who therefore do not receive a grade)?**

Yes, students who withdraw from a course (i.e., exit a course after census and received a W) are included in the starting cohort (just as they are included in calculation of course success rates. Students who drop a course before census and do not have a grade of record would not be included in the cohort.

**Guided or Self-Placement (GSP)**

**If our Guided Placement does not place students into pre-transfer level, do we have to submit this form?**

For colleges that enroll any students below transfer-level, they must complete Option 3 and submit the data addendum template. If any students that engaged with guided or self-placement (GSP) enrolled below transfer-level, then results for all students that engaged with guided or self-placement need to be reported in that tab.

**From the instruction of the template, is the guided or self-placement tab only applicable to students who did not have US HS information? If so, then this group can only be reported as "GPA Unknown"?**

Theoretically yes, guided or self-placement should only be used for students who do not have high school transcript data reasonably available. However, some colleges experimented with guided or self-placement during the innovation period for broader sets of students and would need to report on all students who engaged with the local GSP process, disaggregated by high school information available.

**Who should be reported on?**

**Are (1) all US HS graduates, (2) certificate/degree/transfer students two separate conditions or one combined condition?**

(and)

**Did you say that a student who declares he/she has not decided on a major or educational goal is not exempt from AB 705 transfer enrollments?**

This is an "and" condition. All US HS grads with any of those three educational goals, transfer, degree, or certificate, including students with undecided or uncollected/unreported goals should be included. This typically covers the majority of students with credit enrollments.

**Do we consider student type in addition to student goal? i.e. students with 4-year degrees taking courses for enrichment would likely fall under the undecided/unknown goal.**

Rules regarding assessment typically do not apply to students who already have four-year degree (except in the rare case where a student is attending in order to complete a course of study that requires math or English different from what they already completed, e.g., a student who completed a theater degree and used statistics to satisfy their quantitative reasoning requirement but who has returned to work toward a STEM degree where calculus is required)

**What do we do about students who received an EW grade?**

Given the unique implementation of EW's where many colleges, though not all, had temporary large increases in EWs in Spring 2020 and to a lesser extent in Fall 2020 with a highly corresponding increase in D, F, and W grades, the template is designed to treat EW grades similar to W grades for the purpose of evaluation.

For columns 1 and 4: Total Enrolled, the template states: These columns show the number of distinct students enrolled at census. If end of term data are used, include withdraws (EW, MW, and W grades) as enrollment in the course.

Thus, you would include them as enrollments in the course, similar to a withdraw, but they would not be included as part of the completion cohort, as they did not successfully complete the course. You can see this definition on row 16 of Tabs 2-4 and Row 30 on Tab 5.

However, if colleges would like to exclude students who received an EW from the enrollment cohort for the purposes of this template's reporting, they may. However, careful comparison of the results including and excluding students with EW grades from the cohort should be done locally and colleges should be carefully attuned to the possibility that this alternative reporting approach might temporarily suggest a strategy might possibly be working that, once the colleges resumed its typical use of EW grades, might not hold up in the long run.

**Reporting Clarifications**

**For #5 on the form, does "enhanced" include our Psych stats course that has a lab component that meets extra hours?**

Enhanced includes *new* additions to the structure of the course that increase the units of the course. Such courses are included in order to make sure to include concurrent support structures that are embedded in the course structure through addition of additional units to the course. So, if a lab component that is part of the course and that component's units are going to be added to the unit total in a single course, that would be an enhanced version for the purposes of the form. If the lab component is designed as a separate attached course that provides concurrent support, that would just be corequisite support. Both types (corequisite support or enhanced courses) would be counted in #5 if new. If the course structure is not new post-Fall 2019 but the number of sections offered with corequisite courses or as the enhanced version of the course is being increased, that would be indicated in #6. If it's other concurrent support that doesn't involve increasing the units of the course or adding a corequisite course, that would be captured in question 7.

**For #6 on the form, how is “expand” defined? Extra units, extra sections, or something else? Is there a particular ratio we should be targeting? That is, how much expansion should we be targeting, or what should the comparison be?**

Expand in the context of question 6 is not referring to the course structure but the number of sections being offered. Changes to the course structure by adding units is covered in question #5.

**What constitutes a curricular innovation on the form? Do new links between pre-existing courses count as a curricular innovation? For example, pre-transfer-level English with a DSPS course.**

Changes to the structure, sequence, or support of courses, including new linkage of courses or learning communities that occurred in or after Fall 2019. So, if this linkage existed prior to AB705 implementation in Fall 2019, this would not be a curricular innovation. If it was developed in Fall 2019 or later, this would constitute one type of curricular innovation.

**Regarding "which enrollments should be reported" on the instruction tab, please define processes change. Change in placement or course? Only report the data of most current existing practices?**

Any change after fall 2019 is considered new. Practices that pre-date Fall 2019 generally did not demonstrate evidence that they maximized students' likelihood of successfully completing the gateway transfer-level course. If colleges have such practices that were, in fact, successful at doing so, the Chancellor's Office remains very interested in any such evidence. If colleges would like to provide such evidence or if colleges have attempted more than one placement or curricular innovations during a period, they are encouraged to report data on each by duplicating the relevant tab and reporting on them separately.

**Since each college's Validation of Practices was reviewed, will each college receive information on the areas they were and were not in compliance with AB705? This would help us prepare for the next phase.**

Generally, with very rare and limited/subgroup specific exceptions insufficient to allow for generalization to the practice, colleges enrolling students below transfer-level courses did not demonstrate sufficient evidence in either English or mathematics at any college to suggest offering those courses was in compliance with AB705. If a college was not offering such courses, then compliance is not generally in question, except in cases where colleges have added noncredit courses, credit courses outside the sequence, or lengthened the transfer-level sequence. As with pre-transfer-level courses, colleges should do the work to demonstrate that such changes lead to students to be as or more likely to complete the transfer-level gateway course that the courses have been added before that course for similar students, even if students taking those courses are doing so voluntarily.

**Every college will submit an Equitable Placement/completion plan, but it will be simplified for those already in compliance?**

Correct. Colleges that already stopped offering prior to transfer-level courses would indicate Option 1 and their submission would be complete (though reviewing all the practices outlined might still be of use to the colleges). Colleges that will no longer offer course prior to transfer-level courses as of Fall 2022 would indicate Option 2 and complete only Part A of the Improvement Plan. Colleges that are continuing to offer courses prior to transfer-level (or that have added to or stretched out their transfer-level courses into multiple terms) would need to complete the entire form as well as the data addendum template.

**Would we have been informed as a college if we already fall into Option #1 for question #2 in the improvement plan (i.e., already achieved full compliance)?**

All colleges are being asked to complete the form, regardless of prior reporting. If the college has already stopped offering course prior to transfer-level and has not added additional courses prior to the previous gateway course (whether as transfer-level courses outside the sequence, as new courses prior to the previous gateway course, or as noncredit courses), colleges can be confident that they fall into Option 1.

**How are B-STEM, SLAM pathways mentioned in the data addendum template being determined? By declared majors or by enrolled first subject course?**

Generally, declared major would be the preferred method as student course-taking may be influenced by availability in ways that would obscure their intent.

**Are we able to track students among the various California community colleges to see if a student who takes a pre-transfer class at one college, leaves that, but goes on to successfully complete at another college within the year timeframe is considered successful?**

For colleges that wish to do so for students within district and can do so easily, that is allowed. Additionally, if colleges have close relationships with other local districts and are willing and able to exchange data for this purpose, colleges may do so but are not expected to do so as inter-district transfer after a pre-transfer level course is 1) not expected to change throughput substantially and 2) if it was, the initial college should be engaging in significant work to consider precisely why so many pre-transfer-level course-takers would be leaving to complete the sequence at another college outside the district.

**Since we know that some students will fail the transfer-level course on their first or perhaps even 2nd attempts, how do you recommend we talk to students about the data, about what to do if they fail or feel compelled to withdraw, so that the college doesn't lose them? Is there no path we can offer to help them, for example a stand-alone non-credit course, other than retaking the transfer-level course and using more support?**

We strongly encourage that we do not accept as an a priori assumption that some students simply cannot pass a transfer-level course. That thinking is birthed from a deficient mindset about students' lacking capacity. Instead, one of the most essential underlying goals of this work is to challenge ourselves to be ready for all students and establish the supports necessary to ensure all students are successful in transfer-level courses; to believe that all students are fully able to be successful IF we equitably provide the support they need. There are many examples included in the Improvement Plan and have been shared across the state in a variety of forums for how better to communicate to and support students.

**Are we allowed to require specific students to enroll in a transfer-level course with support (versus without)? We are finding that more students are enrolling in the courses without support because they do not want the extra unit(s)... not necessarily because they don't need the support.**

Colleges are allowed to require students to enroll in a transfer-level course with support provided the requirement generally follow the Chancellor's Office high school performance bands – i.e., support shouldn't be required in the middle or upper band of student high school performance without evidence to support it (i.e., that those students are somehow demonstrably less likely to succeed and the required support improves students' likelihood of success in the course relative to students or



similar ability who attempt the course without support). As long as those conditions are met, whether support courses are required or recommended with transfer level courses is determined locally by each college.

**Do you have any recommendations as to whether students should take both college-level English and Math their first semester, or start one in the first and one in the second semester? And, if taken consecutively, which is better to take first semester?**

First, AB705 doesn't require that colleges take transfer-level math and transfer-level English in the first year. Rather, it requires that colleges are working to maximize students' likelihood of completion of the gateway course in the discipline within the first year *of when they begin in the discipline*. Generally, that means that students should be placed into and, *when they begin in the discipline*, enrolled into the gateway transfer-level course appropriate for their educational pathway, with support if appropriate.

That being said, students tend to do better if they are engaged early in courses within their program of study (it is one of the reasons that early enrollment in courses within students' program of study has long been used as an early momentum metric in national Guided Pathways work). Thus, maintaining space for taking such courses is important and taking both English and mathematics in your first semester might serve as a significant barrier to that engagement and might be especially challenging if students have recommended or required support in both English and mathematics. As to which is better, to date there is not compelling evidence one way or the other. However, there is some evidence (see, e.g., [Wang, 2016](#)) that students who take courses in their program of study before they take their first math course, including in STEM pathways, are more likely to persist and complete their intended educational outcome than those who take their mathematics courses prior to courses in their intended program of study.

## **DSPS**

### **What about DSPS students?**

(and)

### **We have asked for the disaggregated data regarding special populations as it relates to DSPS? Is this data available for the field to look at? I know this was requested.**

To date, results have shown that access and successful completion of students with disabilities are both improved by providing students access to transfer-level courses, with support if appropriate. To date, evidence from both [the Transfer Level Gateway Completion Dashboard](#) for more details as well as previous research conducted in support of AB705 such as [this one](#) demonstrate the greater effectiveness of the transfer-level pathways for students with disabilities. Given that evidence, both AB705 and the general body of law protecting individuals with disabilities strongly indicate that students with disabilities should be provided the same access to transfer-level courses.

In the past, developmental courses have been used in some colleges as opportunities to develop individualized education plans, necessary institutional and instructor accommodations for students with disabilities, or a more complete understanding of the disabilities a student might have. Maintaining courses prior to transfer-level for these purposes is an inappropriate use of such courses. Students with disabilities should have access to the legally required accommodations and support prior to enrollment directly in transfer-level, with the possible exception of students with disabilities sufficiently significant to preclude certificate, degree, or transfer goals. As with any other students, if colleges can demonstrate that students with disabilities are as or more likely to complete transfer-level coursework when they start in below transfer-level coursework as when they begin in transfer-level courses (*if provided appropriate accommodations at that level and corequisite support if appropriate*). Colleges would be well advised to consider how to provide some of the previous structure and support

to students with disabilities that occurred in developmental education courses within the structure of corequisite models of support.

### **Is there DSPS information that is disaggregated by disability type?**

Additional research disaggregating outcomes for students with disabilities by disability type is underway. In the meantime, colleges may provide evidence of effective pathways for students of different disability types by making a copy of the curricular innovation tab and providing evidence of the greater effectiveness of such pathways that way or by providing evidence on an additional tab.

### **Does the High School Achievement include Special Education Programs which have modified instruction, classes for students with disabilities?**

Colleges may take into account the types of courses students were enrolled in during high school in determining students' likelihood of completion and what level or types of support that colleges provide to students.

### **Effects of the COVID-19 Pandemic**

#### **Is it valid to require evidence with the specified timeframe knowing that the data collection period was heavily impacted by COVID-19 pandemic?**

(and)

#### **From what I understand, the data being referenced is for the first two years of AB705, so 19/20 and 20/21. Is there a concern about using completion data from the pandemic to craft recommendations? The pandemic and the shift to online is a huge confounding variable.**

First, the standards available for comparison were designed to compare outcomes for students within the same time frame so some effects of the pandemic and the shift to online courses should exist on both sides of the comparisons in play. Second, the entire body of evidence in California prior to Fall 2019 (as well as in other states) strongly, consistently, and repeatedly suggest pathways in English and mathematics that start below transfer-level were less effective for similarly qualified students than pathways that began at transfer-level. Third, the thresholds/standards used are highly conservative in that they provide maximum opportunity for colleges to demonstrate that below transfer-level pathways are effective – i.e., students receiving an entire additional semester (or more) of instruction (e.g., a sizable and costly intervention to improve their outcomes) only have to demonstrate an *equal (not necessarily better)* rate of completion of the transfer-level course than students that begin there *without support*. Fourth, many of the remaining below transfer-level courses at colleges did not represent new curriculum or approaches but identical or highly similar versions of previous courses and, thus, lots of evidence for the effectiveness of those approaches would have been available for colleges to use (but see the second point above). Taken together with the observed results that *no college* was able to demonstrate an equally effective pathway that starts below transfer-level in English or math across all of our colleges, these all triangulate to suggest high confidence that colleges need to wind down the use of below transfer-level courses. However, the Chancellor's Office remains open and eager to receive any evidence demonstrating the effectiveness of such pathways or even the potential evidence to that effect (e.g., new offerings starting in Fall 2019 or later that led to high rates of success in the below transfer-level course, high rates of persistence to the transfer-level course in Spring 2020, and high rates of success of those that stayed enrolled in Spring 2020 – i.e., if you removed students with COVID-induced withdrawals in Spring 2020 from the denominator, the throughput from the below-transfer-level courses in Fall would have been competitive to students who started at transfer-level courses in the Fall)

## **ESL & ELL**

### **Where can we find and look at that data that shows that English learners are best served by starting in transfer level English?**

For students who are US high school graduates, a summary of research examining this question for students within our system is available [here](#).

### **Must ESL students who graduate from U.S. high schools be placed immediately in a transfer level English course or do they have 3 years to take any needed pre-transfer ESL courses as well as complete transfer English?**

All US high school grads, including students with ESL or ELL backgrounds, should be placed using high school data and should be placed, enrolled, and supported to maximize their completion of transfer-level English within one year based on this guidance and Improvement Plan, which would generally be in transfer-level English composition, with support as appropriate.

Students who graduate from a US high school with an ESL or ELL background are required to be informed of their right to enroll in transfer-level English (with specifically designed ESL or ELL support if possible and as needed) or an ESL equivalent to transfer-level English or, alternatively, appropriate ESL alternatives.

### **Is it considered throughput if a student moves from Credit ESL to transfer level English?**

No. Completion of transfer-level English (or an ESL equivalent of transfer-level English that satisfies the same transfer requirements as transfer-level English) is the outcome measure for throughput calculations and the probability of successful completion of that course (or ESL equivalent) needs to be maximized for those students as well, in one year for US high school graduates and in three years otherwise.

### **What if the students who enroll in the below transfer course do not have a HS GPA because they are immigrants?**

Students who do not have HS data can be placed using guided/self-placement. Any below transfer-level courses would be expected to be within the ESL discipline and thus not currently under review.

### **Do these GSP guidelines apply also to students without a US HS diploma (students from other countries--ESL)?**

The guidelines and restrictions on guided or self-placement do not change as a function of the student's country of origin.

### **How do we report their success? Only the bands were shown on the form.**

You would report their outcomes under the GPA Unknown option.

## **High School Information & Performance**

### **Please clarify: The state default placements for Math STEM courses assume a student has passed Algebra II in high school. If a student has not passed Algebra II in high school, is it appropriate to place them into a college level (pre-transfer) level course to learn this content prior to transfer-level STEM courses?**

That previous guidance went on to indicate that students who have not completed Algebra 2 or higher in high school but who enter college with intentions to major in STEM fields are rare and that good



practice would be to inform them of that Algebra 2 is highly recommended as preparation for a STEM-oriented gateway mathematics course and that their likelihood of success will be higher in a statistics course.

However, evidence since then strongly suggests that providing Algebra 2 content in a prerequisite format does not maximize students' likelihood of completion of a gateway transfer-level mathematics course for STEM pathways and, as a result, providing Algebra 2 content needed for success in such courses would better be provided through corequisite support rather than prerequisite coursework (see page 6 of the ESS 21-300-015 for more).

**The last bullet says: "Where students hadn't previously completed the prerequisite in high school." This seems to be the primary concern of the math professors at my college. If we restrict enrollment to only those students who did not pass the class already in high school, would we still need to complete the full data analysis and submission?**

Colleges that enroll any students in pre-transfer level coursework still have to submit the data addendum and show that that placement and enrollment practice is effective, i.e., as or more likely to lead to students' successful completion of the transfer level course as students who start at transfer-level.

**It states, "where students hadn't previously successfully completed the prerequisite in high school", does this address the student that did not pass Algebra II in high school yet wishes to take STEM courses?**

Based on evidence discussed in the memo referenced above, students who did not successfully complete Algebra II in high school seeking a STEM pathways are still better served by starting at the gateway transfer-level mathematics course at transfer-level with appropriate support.

## **Dual Enrollment**

**How do these apply to dual enrollment pre-transfer courses requested by High schools?**

(and)

**We have pre-transfer math courses that middle and high school students are taking over the summer because they want to take calculus in high school - it's a community we serve. Are we supposed to keep our other students out of these courses??**

(and)

**"Dual enrollment should follow the same placement rules." We have a high school on our campus and the high school students are working through pre-transfer level math. We offer pre-transfer level courses as dual enrollment on their property. What does the above statement mean? Are we not able to continue offering pre-transfer level to high school students?**

**I'm curious how colleges are implementing AB 705 for Dual Enrollment students in the 9th and 10th grade?**

Colleges may offer pre-transfer level courses as part of dual enrollment/CCAP agreements/Middle College programs. Generally, these programs should follow the same methods of placement that we have put in place for our system, namely, that students should progress naturally in these sequences, not have to re-take courses already successfully completed, and the methods used for placement should generally govern. Colleges may offer pre-transfer level courses in high school dual enrollment settings without opening them to college students as a) AB705 generally precludes placing or enrolling college students in prior to transfer-level courses

and, thus, b) remains compliant with 76004 (k)(1) as it is not reducing access to the same course being offered at the community college.

### **Non-credit Coursework**

**Does the requirement to move from pre-transfer to transfer level apply to students taking a noncredit math class that covers pre-transfer topics?**

(and)

**If we implemented a new, non-required, low- or no-unit course for students who wanted additional skills practice, does this course count as first coursework in the discipline? In other words, do we need to make sure a non-credit English course or Math course is immediately followed with the transfer-level course in the next semester?**

(and)

**Can we offer a stand-alone non-credit intermediate algebra course? Do we need to validate non-credit courses?**

(and)

**I still am wondering about whether non-credit courses are allowed, bridge courses in summer, etc.**

Generally, moving pre-transfer level courses to noncredit does not obviate the requirements of AB705. That is, if a college is continuing to provide courses that students are required to take or are voluntarily taking prior to enrolling in transfer-level courses, colleges have the same responsibility to demonstrate the effectiveness of those pathways under AB705 and thus would need to select Option 3 and complete the data addendum template to demonstrate the effectiveness of those pathways by comparing similar students that take such courses first to those who take the transfer-level course first.

**Can we offer stand-alone non-credit intermediate algebra class for our students who come to us with only algebra 1 in HS and want to pursue STEM?**

Students arriving to community college with only Algebra 1 seeking a STEM degree are very likely better served by providing corequisite support at the entry level, transfer-level STEM course in mathematics and/or provided clear guidance and counseling about the realities of STEM pathways for students who begin a STEM pathways only having algebra 1 at the beginning of their educational journey in college. Offering a non-credit intermediate algebra class would

**To what extent can noncredit math bootcamps be used before students take transfer-level math? I remember that sequences of noncredit courses to credit courses were discouraged when AB 705 guidance was first released, but that short-term workshops were okay. Are there any limitations to be aware of (like maximum number of hours, weeks, etc.)?**

Voluntary noncredit opportunities such as workshops to refresh skills prior to the start of the semester may be viable. However, such opportunities should be held to the same standard as those discussed above and students participating in such opportunities should be as or more likely to complete the gateway transfer-level course as similar students who start directly in that course. Additionally, such programs should meaningfully explore whether embedding such opportunities and support would be more effective when provided concurrently at the beginning of the semester or in combination with corequisite support in the course.



## **Do non-credit courses start the one-year clock? Is that considered enrollment “in the discipline”?**

What “starts the clock” varies somewhat depending on the purpose trying to be accomplished, e.g., whether it be in the Student Centered Funding Formula on the Student Success Metrics (where the year being considered is established by students’ status as a first-time credit, non-special admit student in the reporting year, even if students start in a Winter or Spring term). For the purposes of AB 705 colleges should be seeking to maximize students’ completion of the gateway, transfer-level course in the discipline within the first year of taking courses in the discipline, whether those courses are credit or noncredit, and should undergo the same types of analyses to determine the effectiveness of the pathway. In evaluating the outcomes of AB 705 implementation, evaluation starts with the first credit enrollment in the discipline.

## **Programs that Do Not Require Transfer-level Coursework**

### **What about students that do not need transfer level math or English for their certificate?**

Colleges should go through a stepwise progression to answer this question. For certificates that do not require English or mathematics coursework, AB 705 does not change those requirements and those certificates need not add transfer-level math or English requirements.

For certificates that require early, prior to transfer-level English and mathematics courses, colleges should first use students’ high school course taking and performance for satisfying those requirements as clearly specified by AB 705. Second, if that pre-transfer level course can be satisfied with a transfer-level course, colleges should instead provide the higher-level, transfer-level course. Third, consistent with the direction of AB 705, colleges should be working on solutions that rely on corequisite or concurrent support strategies within those certificates to help provide the requisite skills desired for completion of the certificate in order to maximize students’ likelihood of completion rather than relying on prerequisite pathways. Third, colleges should be seeking to maintain the potential of students in certificate programs, many of whom are or were considering transfer, and making appropriate transfer-level courses with corequisite support available may provide similar short-term completion rates to previous prior to transfer-level courses but far better long-term opportunities for students.

### **To clarify... The districts are required to place students in transfer level math and English even if the certificate program pathway DOES NOT include any math or English courses as part of that program?**

(and)

### **Why would the district be required to place students in transfer level Math and English even if the certificate program pathway DOES NOT include any Math or English courses as part of that program? If their plan and goals clearly show they do not need to take those classes can they be skipped.**

This is detailed in both the memo and was highlighted during the webinar on Slide 7. Colleges are not required to create course requirements that don't currently exist. Colleges need neither place nor enroll students in transfer-level math and English for certificate programs that do not include math or English requirements as part of that program.

**"Colleges are required to demonstrate the effectiveness of those pre-transfer level courses per the standard set by AB705 which is successful entrance and completion of the relevant gateway course." What if a pre-transfer level course is the goal? For example, we have a "math for nursing" class for our nursing students entering the nursing program. It was designed for**

**nursing students. They don't want to get into transfer level math courses. How do we "validate" this course since it is pre-transfer level?**

(and)

**What about a Radiologic Tech program that needs skills from Intermediate Algebra more than our transfer-level math courses? Intermediate Algebra is not specifically tailored to the program, but it is a best fit. Transfer-level courses like Statistics could meet the math requirement and have higher throughput but might not best meet the needs of students.**

Colleges may offer courses designed to satisfy requirements for programs that are not satisfied by transfer-level mathematics courses. They would select option 3, provide the data demonstrating the effectiveness of the course for that pathway using the specific college math tab in the data addendum template to enter data for college-level math for degree programs with requirements that are not met with transfer level math. Using that tab provides colleges the opportunity to validate the outcomes that the course is working appropriately for the program. However, colleges should always be doing the work necessary to make certain that such courses are maximizing students' likelihood of completion and are not unnecessarily limiting students' future prospects where a well-designed transfer-level mathematics course with appropriate support might have similar success rates to such courses but provide better prospects for post-associate degree opportunities.

**Just to be clear, are students in associate programs that have the "standard" math requirement of Intermediate Algebra or above (without any specific math course or skill needs) required to enroll in transfer-level math because transfer-level math meets the math requirement?**

In addition to courses that satisfy requirements of a program that can't be met by a transfer-level mathematics course, colleges that can demonstrate that an alternative, pre-transfer-level pathway is more effective and provide that evidence as part of the data addendum, pre-transfer level courses may be allowed for students who haven't previously successfully completed that prerequisite course. However, all colleges continuing to offer courses prior to transfer level must choose option 3 and provide evidence supporting that choice. Additionally, institutions should make sure to compare that pathway to one in which that material is designed meaningfully into a support course at the transfer level.

**Are we suggesting that pre-transfer level courses should be eliminated, even with programs that don't require pre-transfer courses?**

Any college that chooses to continue to offer pre-transfer level courses and allow such enrollment must demonstrate the effectiveness of those pathways using the data addendum template.

**I may be a bit ahead of the answer for this, but I reviewed the form, and I am wondering how to answer #2. I think we are a college that is Option 1 with our AB 705 implementation: transfer-level is the default (w/ coreq). However, I believe we also have pre-transfer math for specific programs (as identified in #4), like the example for technicians. Would we then need to check Option 3 for question #2?**

Colleges that continue to offer courses prior to transfer-level must choose option 3 and complete all relevant sections of the improvement plan and the data addendum template in order to demonstrate the effectiveness of that pathway.

### **How will this impact articulation agreements that may require below transfer courses?**

That is addressed in the materials in terms of how to navigate the current realities. Additionally, we are having conversations with CSU, UC and legislators about the needed alignment with our 4-year partners for full AB 705 implementation.

The current [IGETC 2.2](#) policy (see page 18, section 10.2) clarifies that intermediate algebra is not specifically required and reiterates that UC is concerned with the needed content being covered, not how it is covered. This policy specifically notes corequisites as an option. UC leadership have also confirmed that it is left to the CCC campus to determine how pre-requisite knowledge is validated.

While the [CSU GE Policy](#) is permissive, the [CSU GE Reviewers Guiding Notes](#) still cites pre-transfer level course pre-requisites, but refers back to UC policy as the source of those requirements. The CO is working with CSU leadership to clarify these policies and will work with ASCCC and CSU to revise the C-ID descriptors accordingly.

### **So, is the CCC recommending requiring a transfer-level math course to fulfill math competency for the associate degree? We currently require a minimum of intermediate algebra (MATH 73 or 80).**

That is not the recommendation. AB705 establishes a variety of evidence-based thresholds that require colleges to provide students access to and enrollment in mathematics courses appropriate to the student's educational goal educational goal and program of study and represent effective pathways. Pathways that start prior to transfer-level must demonstrate that they are at least as effective a pathway for students as providing a transfer-level course that satisfies the requirement, with support if appropriate/needed.

### **For students who have a goal of transfer but would like to pick up an associate degree on their way, can these students petition to take Intermediate Algebra? Perhaps this can be addressed in the future memo and guidance that you create.**

Students with a goal of transfer would need to complete a quantitative reasoning course that was transfer-level in order to be able to transfer. Whether a petition is in place or not, all student outcomes will be assessed and must meet the standards of AB 705 - that where students begin in the discipline demonstrates (per local data) to be most effective for students' completion. A student petition does not negate the college requirement to demonstrate effectiveness of practice..

### **Our pre-transfer students aren't ever going to complete transfer math. They are certificate students.**

The evidence for this deficit-based view of our students is lacking. A variety of institutions and systems have demonstrated that providing students corequisite support is very effective and superior to prerequisite pathways in the number of students who successfully complete the course, who take the next courses, and who successfully complete the next course.

Additionally, see previous answers for a meaningful stepwise progression of how best to support such students with math courses appropriate to their educational goal and program of study.

### **So, students who do not intend to take a transfer-level class and they meet their goal with pre-transfer level class will be counted against the success rates for throughput?**

Potentially. If a transfer-level course would satisfy those requirements and *similar* students that start in the transfer-level math courses that would similarly satisfy the math requirement for the program are

more likely to successfully complete the transfer-level course, than colleges should be closely examining the appropriateness and effectiveness of the pre-transfer-level courses. The standard set by AB705 is that colleges should be placing and enrolling students into transfer-level courses, with support if appropriate, for transfer-seeking students *and* degree or certificate seeking students where the math or English requirements of their program can be met with a transfer-level course.

### **Miscellaneous**

#### **On Part B of the Improvement plan, one recommendation involves blocking enrollment for below transfer classes. Would we have to update the Course Outline of record to place that restriction?**

That recommendation has been to require counseling or a waiver before a student enrolls in a pre-transfer level course (when there is an appropriate transfer-level alternative) as an option for colleges to consider to improve AB 705 implementation. Such a requirement should be cited on the COR.

#### **Can we still create new pre-transfer level courses for fall '22 that do not yet have any data but that we believe will create higher throughput?**

(and)

#### **Are colleges allowed to continue to innovate with new, pre-transfer level courses or multi-term course sections?**

Not in an institution-wide way. There has been a substantial period of potential innovation dating back to the Basic Skills Outcome Transformation Grants. There does continue to be opportunities to demonstrate the effectiveness of alternative pathways but, given the evidence to date, the effectiveness of such approaches should be first demonstrated as a pilot before scaling, with clear opportunities for those students to choose transfer-level courses with appropriate support.

Generally, the college would be doing itself and its students a disservice to seek implement such a course at this stage of implementation as research to date has not shown these to be effective. Instead, innovation efforts should focus on how to support students in transfer-level courses and creating course taking sequences that get students into and successfully through the relevant gateway courses in one year (from first enrollment in the discipline) rather than seeking new ways to continue to offer course prior to transfer-level.

#### **Will the CCCApply GPA question be changed to collect GPA for students who have been out of high school for more than ten years?**

Thank for alerting us to this need. This change was previously scheduled to occur but had not been implemented. We are following up to make sure this change is implemented in the next cycle of changes of CCC Apply.

#### **Are Reading departments out of AB705 as English is in a separate department? Or is it included when you say English & Math... Is there any literature that clarifies this?**

The Chancellor's Office closely consulted with the authors of AB705 on this question multiple times during the tenure of the AB705 Implementation Workgroup. The expectation for courses in reading was that courses prior to transfer-level that effectively acted as a prerequisite for the gateway transfer-level course in English would have to demonstrate the same effectiveness of the pathway, namely that colleges would have to demonstrate that students who were required or voluntarily took such pre-transfer-level courses were as or more likely to complete the gateway transfer-level course in English than students that started in that course, with support as appropriate. Additionally, reading-related



instruction would potentially be useful parts of concurrent support or corequisite course provided to students for whom it would be appropriate.

### **Any plans to integrate this reporting requirement with MIS reporting?**

With the collection of student placement information starting this past fall, more of the data necessary for satisfying reporting requirements around AB705 and AB1805 are now in place. Most of this exercise is not a data reporting exercise, however, but a planning and practices reporting exercise. Additionally, the portion that is data reporting (e.g., on the effectiveness of local practices for particular populations of students) is too specific to be fully completed through MIS reporting for colleges that wish to continue providing courses below transfer-level. For colleges that no longer offer courses below transfer-level, there is no data reporting required.

### **Resources**

#### **Will we have access to the recording later today?**

(and)

#### **Is it possible to get a copy of these slides?**

(and)

#### **Can you provide the Memorandum?**

(and)

#### **Thank you for this discussion. Is there a way to have this webinar again for others who were not able to make it today?**

The recording, slides, memorandum, form, and supporting documents are in the Implementation Updates topic of the Equitable Placement community on the Vision Resource Center:

<https://visionresourcecenter.cccco.edu/>. If you are already logged into the VRC, the following link should take you there directly:

<https://cccpln.csod.com/phnx/driver.aspx?routename=Social/Topic/TopicDetails&Topic=1490&Root=140>