



California Community Colleges

MEMORANDUM

July 11, 2018

AA 18-40 | Via Email

TO: California Community Colleges and Districts

FROM: Laura L. Hope,
Executive Vice Chancellor, Educational Services and Support

John Stanskas,
President, Academic Senate for California Community Colleges

RE: Assembly Bill (AB) 705 Implementation

A BRIEF HISTORY

Since the adoption of the Master Plan for Higher Education in 1960, the California Community Colleges, in addition to their primary missions of academic and vocational instruction, were also tasked to provide “remedial instruction for those in need of it.” As of 1986, title 5 regulations required that colleges employ multiple measures, which were often not well-defined, in order to provide placement recommendations for students. For well over a decade, faculty, staff, and administrators have been working to design tools and techniques to better support students enrolled in “basic skills” courses and improve their success. This work can be traced back to the late 1990s and early 2000s when there was a significant growth in the development of English, English as a Second Language (ESL), and mathematics course sequences designed to address students’ perceived skill gaps in order to help them be more prepared for college-level course work. Even then, faculty questioned the efficacy of system placement processes in a 2004 [Academic Senate paper](#) urging the evaluation of placement processes and the impact on student success. In 2007, the Chancellor’s Office published [Basic Skills as a Foundation for Success in the California Community Colleges](#), a repository of strategies and approaches intended to improve the delivery of instruction and student services for students deemed “unprepared.” This publication was created by the RP Group and the California Community Colleges and subsequent efforts were endorsed by the Academic Senate for California Community Colleges and resulted in a variety of innovative efforts across the state.

These efforts were well-intentioned and thoughtful, using the best information and research available at the time. Scaffolded course sequences were designed by faculty as a way to build student success by developing a foundation that would logically lead to transfer-level course success and ultimately college graduation and completion.

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Unfortunately, this approach also did not yield successful results as expected. Despite the best of intentions and care for students, the research landscape has shifted as an increasing number of studies indicate that traditional placement practices and course sequences have had unintended consequences including requiring students to retake course material they successfully completed in high school, placing students lower than in courses where they would be likely to succeed (sometimes referred to as “under-placement”), and reducing students’ likelihood of completing the gateway course in the discipline (referred to as “throughput”). Due to a variety of complex factors, too few students successfully move through basic skills course sequences and finish transfer-level English and mathematics. A further concern is the likelihood that students of color and low-income students are more likely to be placed into the lowest levels and among the students least likely to persist and succeed.

Efforts like accelerated developmental courses have helped, and the research on such practices shows that more students are likely to thrive when these innovations are scaled; however, those practices are only available to a fraction of California’s community college students enrolling in [English](#) and [mathematics/quantitative reasoning](#) according to the Public Policy Institute of California. Some studies also suggest that accelerated developmental courses produce lower completion gains than models in which students enroll directly in transferable courses with concurrent support.

INTRODUCTION OF ASSEMBLY BILL (AB) 705

Assembly Member Irwin introduced AB 705, which was unanimously passed by the legislature and signed into law by Governor Brown in October of 2017. This bill is designed to accomplish several important outcomes that are paramount to the Chancellor’s Vision for Success:

1. Increase the numbers of students who enter and complete transfer-level English and mathematics/quantitative reasoning in one year
2. Minimize the disproportionate impact on students created through inaccurate placement processes
3. Increase the number of students completing transfer-level English within three years

Because strategies to achieve these outcomes must be implemented by the fall of 2019 (fall of 2020 for ESL), faculty, staff, and administrators will need to actively engage various aspects of developmental education reform: assessment and placement, curricular design, co-curricular design, and non-curricular support. Colleges should see this as an urgent call to innovate in order to serve their communities with the expectation that after two years, collected data will show improved rates of completion of transfer-level English and mathematics attainment. AB 705 adds a layer of accountability new to colleges and important for students. In order to demonstrate compliance, colleges are expected to justify their choices and collect data demonstrating efficacy. Colleges that choose not to innovate in these areas are expected to implement

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the minimum default parameters set by the system. In this case, local or additional validation research will not be required. Alternatively, colleges can choose to conduct their own local placement research to ensure their practices comply with the requirements of the law. For colleges that do choose to locally innovate in these areas, the Chancellor's Office and the Academic Senate will support and encourage those implementation efforts.

As the Chancellor's Office works toward more specificity regarding the implications of AB 705, many faculty and staff have asked about the role of local innovation and validation in light of the default statewide placement rules. If a college adopts the default placement rules, the college is AB 705 compliant but that is the minimum level of compliance. There are significant opportunities for local customization and innovation in the form, delivery, and/or amount of concurrent support for students enrolled in transfer-level course work.

Colleges may opt to develop their own placement rules. If these rules place students into pre-transfer-level coursework who would otherwise be allowed access to transfer-level coursework under the default rules, the college must collect data to demonstrate students benefit from those local decisions. They will need to demonstrate that those students are highly unlikely to succeed in transfer-level if placed there directly and that the lower placement gives students the best chance of completing transfer requirements in math and English.

Similarly, special programs in which students start in non-transferable coursework (e.g. an accelerated two-semester sequence) are AB 705 compliant if the college is able to demonstrate that the program serves students who are highly unlikely to succeed in transfer-level coursework and that the program maximizes those students' likelihood of completion of the transfer-level English or math (or educational goal appropriate course) within two primary semesters (or three primary quarters). Colleges will still need to honor students' right to enroll in transfer-level courses unless it can be demonstrated that students are highly unlikely to succeed. The burden of proof is not on the student but on the college to demonstrate that transfer-directed students with the lowest likelihood of success in the transfer-level course have a better chance of completing transfer-level coursework if required to enroll in the special program.

Numerous tools already exist for collecting the necessary evidence (such as students high school performance if not already locally collected/available) and conducting the appropriate analyses for doing so under the resources section of the web page for the Multiple Measures Assessment Project. Additional tools and resources to support local research are already being developed to further assist colleges in their efforts and will be rolled out over the summer. Nonetheless, while the specifics may vary from college to college, the direction of what AB 705 requires is clear. Colleges should be acting now to evaluate and redesign all aspects of developmental education and transfer attainment focused on these areas: assessment and placement, curricular design, co-curricular design, and non-curricular support.

THE GOAL OF IMPLEMENTATION

The Chancellor's Office views AB 705 as a fundamental approach for the California Community College System to restructure developmental education in ways that will provide more inclusive and expansive access to transfer-level English and mathematics/quantitative reasoning courses and increase the numbers of students who successfully move through these high-stakes gateways. The evidence demonstrates that increased transfer-level access provides increased success, and so the Chancellor's Office is expecting that college policies and practices will shift to align with the intent of the law. Policies, practices, and pedagogy should reflect that shift in providing more opportunity and fewer barriers. As the efforts for colleges to locally apply the law continue to be evaluated, this intent will be the primary focus of any System-wide and local validation, monitoring, or review by the Chancellor's Office. More information on validation processes and disaggregation requirements will be made available as the Implementation Advisory Committee continues the work of planning for implementation. Because the [Vision for Success](#) outlines ambitious goals to erase barriers to equitable outcomes, the Chancellor's Office will be monitoring the implementation of AB 705 very closely.

ASSESSMENT AND PLACEMENT

Assessment and placement are foundational building blocks for AB 705. The traditional paradigm in which students are evaluated by a cognitive skills test has changed to one that utilizes high school performance data as the primary means for predicting student success. This shift may sound nuanced, but, in fact, colleges must move from a system that utilizes assessment for placement schema that demand demonstration of skill to one where the assessment for placement schema is a predictor of success in a course. Research has demonstrated that indicators like overall high school GPA, individual course-taking performance, and course-taking patterns have equal or superior predictive value than the traditional assessment tests because they are a better reflection of students' capacity. High school performance metrics have been shown to be most predictive, especially when the student is within ten years of high school graduation. The shift toward these metrics in placement schema should also allow students to demonstrate other factors that may impact educational performance like motivation, commitment, and maturity. Colleges will need to develop placement models that align within the framework of the law to address the needs of all students with varying needs, not just recent high school graduates. In addition, clarifying students' educational goals and ensuring appropriate course selection is especially critical when establishing mechanisms for placement in mathematics/quantitative reasoning courses.

Under AB 705, colleges are prohibited from placing students into a pre-transfer course in mathematics or English unless the following conditions exist:

1. Students must be highly unlikely to succeed in the transfer-level course **AND**
2. Enrollment in the pre-transfer course will improve the students' likelihood of completing the transfer-level course in a one-year time frame.

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The purpose of these standards is to assure that the risk of student underplacement is minimized and the probability of student completion is maximized. These two tenets are most readily understood through the use of the research conducted by the Multiple Measures Assessment Project, MMAP, team in support of the AB 705 Implementation Advisory Committee. This research indicates that direct placement into transfer-level English and/or mathematics/quantitative reasoning may best serve many students, particularly those who recently completed high school. The MMAP analysis represents an (2007-2014) analysis of students who were given a placement recommendation using Accuplacer and then correlated to their high school grade point averages and success in the class in which they first enrolled. The comparison, and AB 705, identify “throughput” as a baseline metric, meaning that students must have a better completion rate within one year if placed below transfer than the baseline rate from the data analysis. The following data tables demonstrate that a higher percentage of students are more likely to successfully complete a transfer level course in one year than the data from the cohort placed one level below. Hence, more students get through transfer level (throughput) when unfettered from even a single basic skills course using the current curricular and support mechanisms in place.

The following tables provide baseline success rates for students that are within ten years of high school graduation. Analysis performed by the MMAP team demonstrates that even students with the lowest levels of high school performance are more likely to successfully complete a transfer level course in one year if they are placed directly into transfer level, rather than being placed even one level below given the current structure of developmental education from a system level.

These are what will be known as the “default placement rules,” which can be used immediately in order to comply with the requirements of AB 705. Note that each threshold includes recommendations for concurrent support depending on students’ backgrounds and needs. As noted in previous guidance, the Chancellor’s Office recommends that students who have graduated from high school within the past ten years and have a goal of transfer or degree attainment should be recommended to enroll directly into transfer-level courses in English, statistics/liberal arts mathematics, and BSTEM-based mathematics using on the correlations as follows:

High School Performance Metric for English	Recommended AB 705 Placement for English
HSGPA \geq 2.6 Success rate = 78.6%	Transfer-Level English Composition No additional academic or concurrent support required
HSGPA 1.9 - 2.6 Success rate = 57.7%	Transfer-Level English Composition Additional academic and concurrent support recommended
HSGPA $<$ 1.9 Success rate = 42.6%	Transfer-Level English Composition Additional academic and concurrent support strongly recommended

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High School Performance Metric for Statistics/Liberal Arts Mathematics	Recommended AB 705 Placement for Statistics/Liberal Arts Mathematics
HSGPA ≥ 3.0 Success rate = 75%	Transfer-Level Statistics/Liberal Arts Mathematics No additional academic or concurrent support required for students
HSGPA from 2.3 to 2.9 Success rate = 50%	Transfer-Level Statistics/Liberal Arts Mathematics Additional academic and concurrent support recommended for students
HSGPA < 2.3 Success rate of 29%	Transfer-Level Statistics/Liberal Arts Mathematics Additional academic and concurrent support strongly recommended for students

High School Performance Metric BSTEM Mathematics ¹	Recommended AB 705 Placement for BSTEM Mathematics
HSGPA ≥ 3.4 OR HSGPA ≥ 2.6 AND enrolled in a HS Calculus course Success rate = 75%	Transfer-Level BSTEM Mathematics No additional academic or concurrent support required for students
HSGPA ≥ 2.6 or Enrolled in HS Precalculus Success rate = 53%	Transfer-Level BSTEM Mathematics Additional academic and concurrent support recommended for students
HSGPA ≤ 2.6 and no Precalculus Success rate = 28%	Transfer-Level BSTEM Mathematics Additional academic and concurrent support strongly recommended for students

MEASURING INNOVATION

The thresholds in these tables provide a minimum threshold for comparison for colleges who seek to conduct their own research and develop their own innovations, taking care to use the benchmark rates for students at the same level of high school

¹ Note: The BSTEM table presumes student completion of Intermediate Algebra/Algebra 2, an equivalent such as Integrated Math III, or higher course in high school. 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. However, good practice suggests they should be informed 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.

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achievement. For instance, if a college has an acceleration model that includes the use of a prerequisite course in preparation of a transfer-level English and/or mathematics/quantitative reasoning course, the throughput for those innovations should meet or exceed the percentages in these tables for all students at similar levels of high school achievement. As title 5 currently allows in [55003\(g\)](#), colleges have not more than two years to innovate and validate their own innovations and compare the effectiveness of those designs to the tables above. The primary philosophy in this recommendation is that students should not be placed or directed in any way such that their completion of the transfer-level gateway course would be less likely than it would have been with direct placement into the course.

The complexity of the placement process cannot be overstated. The diversity of student goals, skills, and educational history are all considerations when developing effective placement models. Not all students are matriculants from high school; for some institutions more than half the students are over the age of 25. Colleges will need to innovate to determine how best to serve returning students. Similarly, colleges must also serve other populations who may have foundational learning needs, and these students must also be served within the context of AB 705, but their needs may require colleges to consider other curricular supports or reforms.

Many practitioners have inquired about the future of cognitive assessment tests going forward. AB 705 prohibits colleges from using testing instruments that have not been approved by the Board of Governors. Currently, the Board of Governors has not approved any testing instruments for placement, despite the claims of some testing companies. As this work evolves, that situation may change, but colleges should proceed with implementation with the assumption that cognitive skills tests will not be a viable part of the placement process in the foreseeable future for English and mathematics/quantitative reasoning.

Some have expressed concern for DSPS students or EOPS students and the movement toward placing more students directly into transfer, and additional research by the MMAP research team demonstrates that these students, like many others, benefit from direct placement. Like other students, they are also much more likely to successfully complete their gateway English and mathematics courses when placed directly. Placement practices, in general, have been more recently informed by the evidence of greater student capacity than we have previously afforded students. AB 705 invites the California community colleges to shift the thinking in favor of what students can do, rather than making assumptions about what students cannot do.

Questions have also been raised about the impact of students who have been given a placement recommendation previous to implementation of new local and state-wide policy. The Chancellor's Office recommends that students retroactively benefit from improvements to their placement recommendations once colleges implement AB 705 compliant infrastructure.

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CURRICULAR DESIGN

These placement reforms imply significant curricular reforms, and faculty are encouraged to engage new ways of delivering course material and planning support inside and outside of the classroom. Previous efforts like the BSSOT grants and acceleration have resulted in many effective practices that might be amplified even further with additional resources or design efforts. The Chancellor's Office and the Academic Senate encourage the continuation of innovative practice that also includes rigorous evaluation of effectiveness to assure that students are successfully reaching and completing transfer-level coursework. Compression of a 2.5-year traditional sequence into an academic year is not the goal, however. Rather, the goal is to provide students with the essential skills necessary to be successful in the gateway English or mathematics/quantitative reasoning course and beyond, depending of the students' goals. Faculty should also design pathways that align with the students' overall goals, and administrators should assure that students have access to these pathways based on the distribution of various majors among the local student population. For instance, if the college educates a large population of students who are non-STEM majors, those students should have access to pathways like liberal arts mathematics or statistics, not just a traditional algebra pathway. Colleges are also encouraged to innovate and design curriculum that best serves their students. For example, a practical mathematics course specifically designed for career technical programs that includes elements of algebra, geometry, and perhaps some trigonometry applied to construction trades may best serve some students. The ASCCC is currently working in partnership with mathematics faculty across the state to create proposals for local consideration.

It is also important to note that the completion of intermediate algebra is not explicitly required for UC transfer. Colleges have the capacity to [verify the "equivalent" skills at the local level](#), which can be legitimately based on high school performance or course-taking. As colleges adopt a guided pathways framework, revisiting mathematics and quantitative reasoning options and how students select them should be an integral element of the implementation of AB 705. A recent study by West Ed called [Multiple Paths Forward: Diversifying Mathematics as a Strategy for College Success](#) indicates that these options are critical for student success.

Based on the placement recommendations discussed above, a majority of students will be placed directly into transfer-level courses. For a smaller number of students, direct placement may not be the best path. Colleges may retain developmental course options, but they may not compel students to enroll in those courses without the conditions permitted in the law. Faculty should determine which of those courses remain relevant and determine whether or not those courses should continue as credit or noncredit depending on their intent. In order to serve all potential students, colleges may develop more than one transfer mathematics/quantitative reasoning course, and colleges that establish any prerequisite courses must be validated according to the framework in this guidance. That framework ensures that those students' throughput is at least as high as direct placement would have been and that students are not blocked from transfer-level

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courses unless there is evidence that they are highly unlikely to succeed there. Pre-transfer offerings should strongly be considered as noncredit.

AB 705 stresses a maximum one-year time frame, and the “clock” for that curricular design should be no more than 2 semesters (or 3 quarters as applicable). The one-year limit begins once individual students begin taking mathematics and English courses that are part of a sequence leading to transfer-level (either credit or noncredit). However, the funding formula favors the completion of transfer-level mathematics and English in the students’ first year of enrollment. This emphasis is supported by a variety of research studies that point to this benchmark as a key completion indicator. Optional preparatory activities offered for credit or noncredit, such as “math jams” or “gear up” programs that include refresher information in English or mathematics as well as college success skills do not count as part of the one-year time frame for AB705 if they are not part of a required course.

CO-CURRICULAR SUPPORT

Co-curricular support will also be an essential component to curricular redesign efforts. Many colleges have observed significant increases in students’ success through co-curricular support models that promote skill and affective development while students are simultaneously enrolled in transfer courses. Typically, faculty have developed additional classroom or learning center options for students that not only focus on practice but on the accelerated acquisition of college-level skills. All of these options, however, should be developed with an eye on maintaining reasonable unit thresholds and out of class time, as AB 705 outlines.

For English, reading skills development will likely play a prominent role in any redesign plans. Although AB 705 does not expressly discuss reading, if reading courses are part of the pathway to transfer level English courses, then they are clearly part of the one-year curricular design sequence. Overall, the community college system has been moving increasingly toward integrated instruction of reading and writing, with fewer than 20 colleges maintaining separate reading departments. The intent of the law is to ensure students’ educational progress is not protracted by inappropriate placement into remediation. For colleges with separate reading and English courses, one option may be to consider an emphasis on integrated reading and writing pedagogy within transfer-level English composition and revising course outlines to include reading faculty as discipline-qualified to teach co-curricular support courses or activities. It is important that reading and English faculty collaborate in the creation of a curricular design and support structure that serves the needs of students and complies with the law. Another approach may be to integrate reading instruction into co-requisite and/or support infrastructures for students who may have more of these needs. Additionally, while the demonstration of reading skills is a requirement for students earning a local Associate’s Degree, that requirement can be met a number of ways. Colleges are encouraged to explore a variety of best practices to verify that students possess these skills before they graduate.

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English as a Second Language (ESL) is not included in this guidance and will be addressed separately as the ESL Implementation Subcommittee continues its efforts. The release of the initial guidance for local implementation of AB 705 for ESL students is expected prior to the beginning of the fall of 2018. Full implementation of AB 705 for ESL is required by the fall of 2020.

NON-CURRICULAR SUPPORT

Non-curricular support is a fundamental component of redesign discussions and efforts (e.g., counseling, mentoring, and guidance related to students' goals). Work with mindset and affective student support may also be part of the implementation strategy to amplify the effectiveness of reforms related to AB 705. With the implementation of guided pathways, the integration between academic affairs and student services has never been more important. While colleges often direct support to unique populations, colleges should strive to provide similar support at scale to all students.

CONCLUSION

Because of the importance of this transition, colleges should anticipate a Chancellor's Office request for local goals, data collection, and monitoring. Future efforts related to implementation of the law include regulatory language in title 5 that reflects the basic tenets as well as a revision of the CB-21 coding within the MIS system. It is also relevant to note that eligibility for both AB 19 and guided pathways funding are contingent upon compliance with AB 705. Even more than compliance, however, the colleges have an unprecedented opportunity to improve the opportunity and access for students while simultaneously addressing stubborn inequities within our system that disadvantage those students who need educational opportunity the most. The California Community Colleges are at the very beginning stages of this work together, and moving forward, the Chancellor's Office and the Academic Senate are urging innovative practices, courageous conversation, and rigorous evaluation.