

TO: Chief Business Officers
Chief Instructional Officers
Admissions and Records Directors

FROM: Christopher (Chris) Ferguson, Executive Vice Chancellor
College Finance and Facilities

RE: CCCStart Transition and Audit Considerations Related to Residency

Background

The Chancellor's Office is currently engaged in a systemwide project to transition the online application used by students to apply to the California Community Colleges from CCCApply to CCCStart. As part of this transition, the student application is being redesigned to improve the student experience, reduce barriers to enrollment, and streamline the information collected at the point of application.

Residency Classification in CCCStart

One area impacted by this transition is the collection of residency information during the application. CCCApply included numerous questions related to residency, citizenship, and immigration status that were used to support initial residency classification and identify students who might qualify for residency-related exemptions or exceptions. However, the lengthy application led to students not finishing or being misclassified and often impacted at-risk populations disproportionately.

The residency section included in CCCStart will be much more streamlined. The vast majority of residency questions have been eliminated, instead the application will allow students to answer two high level questions and self-certify that they:

- (1) hold a citizenship or immigration status that permits them to establish California residence for tuition purposes, such as United States citizenship, permanent resident status/applicant, refugee status/applicant, asylum status/applicant, or another eligible immigration status or visa type, and
- (2) meet the general requirements for California residence for tuition purposes, including physical presence in California for at least one year and intent to make California their permanent home.

The streamlined application does not eliminate a district's responsibility to make residency determinations consistent with applicable law and regulation. At the same time, the CCCStart

self-certification process is intended to support residency classification without requiring students to submit additional documentation. Districts may request additional information or documentation when needed to resolve conflicting, missing, or unclear information, or to evaluate a specific exemption, exception, or reclassification request if there is reasonable basis to question a student's eligibility. However, districts should not require additional documentation as a routine matter solely because the student's residency information was collected through CCCStart self-certification.

Upcoming CDAM Updates

We understand that colleges and districts have raised questions regarding how these changes may impact annual audit review, particularly related to residency.

To address this concern, our office is reviewing and updating the applicable audit guidance, including CDAM Test 425, to align with the transition to CCCStart. This update will be included in the 2026-27 CDAM. The intent of the update is to ensure that audit procedures reflect the information that colleges will have available under the new application structure and that auditors do not request information that is no longer collected through the systemwide application.

Our expectation is that auditors will not issue findings solely as a result of the transition from CCCApply to CCCStart or because CCCStart does not collect residency-related information in the same manner as CCCApply. We will continue to communicate these changes with the auditors so that everyone has a clear understanding of the coming changes.

Additional guidance will be provided as the CCCStart transition and related CDAM updates move forward. Districts and colleges are encouraged to continue identifying operational questions so they can be addressed through implementation guidance, audit manual updates, and related technical assistance.

Residency Overview Document Updates

The Chancellor's Office will also review and update the Residency Overview document to align with the transition to CCCStart. Although CCCStart will not require students to answer the same detailed immigration status and residency questions currently included in CCCApply, the Residency Overview Document will continue to include relevant legal and regulatory guidance regarding eligibility to establish California residence for tuition purposes, as well as available exemptions.

The goal of the update is to support a self-certification model that reduces unnecessary barriers for students, while preserving clear guidance for colleges on the relevant statutes and regulations related to student residence determination.