



**TO:** Chief Executive Officers  
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Chief Student Services Officers  
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Academic Senate Presidents  
Articulation Officers  
Curriculum Chairs  
Admissions and Registrars  
Institutional Research Planning and Effectiveness Professionals

**FROM:** Dr. Aisha Lowe  
Vice Chancellor, Educational Services & Support Division

**RE:** Equitable Placement and Completion: English and Math Validation of Practices and Improvement Plans

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As we continue to work toward fulfillment of the [Vision for Success](#) and the diversity, equity and inclusion at the heart of the [Call to Action](#), effective implementation of Assembly Bill 705 (AB 705) is essential and remains a primary priority for the Board of Governors and all California Community Colleges. The California Community College system has reached an important milestone in our implementation and evaluation of AB 705, which is detailed in this memo.

**This guidance memorandum addresses:**

- Background and context on AB 705 implementation to date
- Results of the Validation of Practices data submitted by colleges and the implications for AB 705 implementation and evaluation
- Guidance for effective implementation of AB 705 for English and math
- Required submission of Equitable Placement and Completion Improvement Plans to ensure full implementation of AB 705
- Status and next steps for English as a Second Language (ESL) implementation

**Summary Overview: The following applies throughout this guidance memorandum (but will not be repeated throughout)**

- Colleges are being directed to shift to transfer-level math and English courses for the vast majority of students (where math and English course requirements exist).
- Under specific sets of conditions, for students who seek a goal other than transfer, and who are in certificate or degree programs with specific requirements that are not met with transfer-level coursework, college-level mathematics may be appropriate if such courses maximize the probability that a student will enter and complete the required college-level coursework or higher within one year of initial enrollment in the discipline.
- Pre-transfer-level courses have not been disallowed. However, colleges are required to demonstrate the effectiveness of those pre-transfer level courses per the standard set by

AB 705 which is successful entrance into and completion of the relevant gateway courses within one year of initial enrollment in the discipline (i.e., placement, enrollment & completion).

- Colleges are being provided with promising practices they are encouraged (but not required) to implement to improve AB 705 outcomes.
- Colleges will ultimately be held accountable for the results of advising, placement, course offering, and concurrent support practices – by student enrollment and success outcomes.
- This applies to students with a goal of transfer to a four-year institution, earning a certificate, or a local associate degree (as per AB 705 and title 5).

This guidance memorandum resets California Community Colleges work to fully implement AB 705 and supersedes previous guidance.

## **Background**

After AB 705 was signed into law in 2017, colleges had two years to prepare for English and math implementation, and an additional two-year period to experiment and innovate to establish local communication, advising, course availability and placement practices that fulfill the mandates of AB 705. That two-year experimentation window concluded in spring 2021, at which time colleges submitted Validation of Practices data for fall 2019 to the Chancellor's Office to assess whether or not the evidentiary proof of effective AB 705 implementation was met – proof that the successful completion of a transfer-level course within one year of initial enrollment in the discipline (i.e., throughput) for students starting in pre-transfer level courses was equal to or greater than that for students starting in transfer-level courses.

In March 2019, title 5 regulations were approved creating section 55522 *English and Mathematics Placement and Assessment*, which established high school performance data as the primary means for placement in English and mathematics (or quantitative reasoning), including self-reported high school performance data. In these regulations, colleges were provided with three options for English and math placement methods:

1. Any Chancellor's Office placement method (i.e., the high-school GPA default placement rules established in 2018)
2. A district placement method based upon local research using high school performance data, supported by data and research showing throughput rates at or above those achieved by direct placement into a transfer-level course (or college-level courses where appropriate)
3. A guided placement process, including self-placement, if a student's high school performance data was not available (or usable with reasonable effort)

Under title 5, §55522(c)(2), placement methods must be designed to maximize the probability that students with a goal of transfer to a four-year institution, earning a certificate, or a local associate degree will enter and complete transfer-level (or the required college-level) coursework in English and mathematics (quantitative reasoning) within one year of initial enrollment in the discipline. Placement methods must not place students in a remedial sequence or pre-transfer coursework in English or math unless (A) the student is highly unlikely to succeed in the transfer-level course; and (B) enrollment in pre-transfer-level (or the required college-level) coursework will improve the student's likelihood of completing transfer-level courses in one year.

As per title 5, §55522(c)(1)(C): A district placement method may be based upon guided placement, including self-placement, **only if** a student's high school performance data is not available or usable with reasonable effort. District placement methods based upon guided placement or self-placement, **shall not**:

- (i) incorporate sample problems or assignments, assessment instruments, or tests, including those designed for skill assessment, unless approved by the Chancellor; or
- (ii) request students to solve problems, answer curricular questions, present demonstrations/examples of course work designed to show knowledge or mastery of prerequisite skills, or demonstrate skills through tests or surveys.

If the adopted methodology incorporates sample problems or assignments, assessment instruments, or tests, including those designed for skill assessment, it requires Chancellor's Office approval. The Chancellor's Office previously provided provisional approval for districts to employ a guided placement or self-placement method which requires Chancellor approval as detailed in guidance memorandum [AA 19-19](#) released April 15, 2019. To validate those practices, "district[s] must collect data to demonstrate that students benefit from the guided and self-placement models implemented. Data reported shall include throughput and successful pass rates, and the college's placement results (e.g., the number of students assessed, the number of students placed into the colleges curricular offerings in English and mathematics/quantitative reasoning, and whether concurrent support was recommended, disaggregated by race and ethnicity)."

To support that data collection and submission process, the Chancellor's Office prepared the Equitable Placement Validation of Practices data template in November 2020, for which colleges submitted data January 2021. Those results are summarized below.

### **Equitable Placement Validation of Practices Results**

Validating equitable placement practices is required per title 5, §55522 under which district placement methods:

- Must place students with a goal of transfer to a four-year institution, earning a certificate, or a local associate degree in transfer-level (or the required college-level) coursework in English and mathematics (quantitative reasoning), unless (A) the student is highly unlikely to succeed in the transfer-level course; and (B) enrollment in pre-transfer level coursework will improve the student's likelihood of completing transfer-level courses within one year of initial enrollment in the discipline
- Shall be designed to maximize the probability that students will enter and complete transfer-level coursework in English and mathematics (or quantitative reasoning) within one year of initial enrollment in the discipline
- Must use all available high school performance data as the primary means for placement in English and mathematics (or quantitative reasoning), including self-reported high school data
- May utilize multiple measures to increase a student's placement recommendation, but may not lower it
- Must be based on localized evaluation supported by data and research showing throughput rates at or above those achieved by direct placement into a transfer-level course

Per title 5, §55522(c)(3): Within two years of the adoption of a district placement method, the district shall report to the Chancellor on its placement method's efficacy. **The Chancellor may order the district to relinquish the district placement method and adopt a placement method published by the Chancellor's Office under any of the following circumstances:**

- (A) the district's failure to report within two years of adoption;**
- (B) the district's failure to demonstrate that the local placement method meets or exceeds the throughput rate of a placement method published by the Chancellor's Office.**

To support that validation process, the Chancellor's Office prepared a data template to streamline data submission and collect evidence in a uniform and expedited fashion. In that data template, colleges reported fall 2019 first-time English and math enrollments for students in the lowest high school GPA band. Data collection focused on students within the lowest high school GPA band to align with one of the key AB 705 stipulations – that students can only be placed below transfer-level if they are “highly unlikely to succeed” in the transfer-level course. Given the research that has accompanied this reform, both in the California Community Colleges and nationally, students in the lowest high school GPA band are the only students for whom one could reasonably consider the possibility of them being highly unlikely to succeed. Colleges reported pre-transfer enrollment data on each applicable tab in the template for specific groups of students based on high school GPA, education goal, and pathway in English, Statistics/Liberal Arts Mathematics (SLAM) and Business, Science, Technology, Engineering, Mathematics (B-STEM). The template auto-populated throughput rates for colleges and provided a local throughput comparison and a statewide throughput comparison rate.

In July 2021 the Chancellor's Office presented results from the Equitable Placement Validation reports to the Board of Governors. Of the 115 colleges that submitted an Equitable Placement Validation report, seven colleges (6.1%) were found to be effectively implementing AB 705, with little to no pre-transfer level enrollments, while 108 colleges (93.9%) reported pre-transfer level enrollments that did not maximize throughput for any group of students or maximized throughput for only one small subgroup of students (5 colleges) or submitted incomplete data or had sample sizes too small for evaluation.

Colleges' placement and enrollment results were cross-referenced against additional data sources (i.e., colleges' published placement rules, schedule of classes for fall 2019 and the Basic Skills Progress Tracker) and found to be consistent with the Chancellor's Office [Transfer-level Gateway Completion Dashboard](#), which provides throughput rates across GPA levels for English and math for students whose first enrollment was in either pre-transfer level or transfer level courses.

***Evidence from all of these sources supports one key finding: when local placement practices require, encourage or allow students to enroll in pre-transfer-level coursework, throughput is not being maximized. Students are more likely to complete transfer requirements in math and English when they are placed and enroll in transfer-level coursework.***

Colleges can review their individual college results in the Validation of Practices Excel file their college submitted to the Chancellor's Office in January 2021, most likely submitted by your Research Office. When a college entered their local data, a local throughput rate was auto-populated as well as a statewide throughput rate for comparison purposes. Disproportionate impacts by race/ethnicity were also auto-populated. As you navigate the tabs in the Excel, you

will see your college's throughput rates, how those compare to the state throughput rate, and color-coded results will show you if your college maximized throughput, where green indicates throughput was maximized and red indicates it was not. For the disproportionate impact analysis, red indicates there is disproportionate impact and action is needed (when there are no disproportionate impacts for a particular group the cell will be blank). Additional details are available within each tab.

### **Effectively Implementing AB 705**

Research shows that since AB 705 was implemented more students are taking and completing transfer-level math and English courses, no matter their high school performance and across all subgroups. Research evidence has consistently demonstrated that when students are placed directly into transfer-level English and math courses aligned with their path of study, completion is expedited, and persistent opportunity gaps are diminished.

Unfortunately, implementation is uneven and equity gaps persist. While rates have increased across all subgroups, gaps remain for disproportionately impacted students. Colleges with large African American and Latinx populations are more likely to enroll students in pre-transfer level courses, and some colleges increased pre-transfer level course offerings in fall 2020.

As we continue to implement and evaluate the implementation of this transformational reform, focus must shift from compliance to full implementation, and not only to the letter of the law, but the spirit of the law. The spirit and intent of this reform was not simply that students have the option to enroll in these essential gateway courses, but that districts and colleges ensure students' entrance into, support in, and successful completion of these courses is maximized.

The work of implementing AB 705 with fidelity requires that colleges create the largest opportunities possible for access to transfer-level courses, ensure the greatest enrollment possible into those courses, and provide students the support they need to perform well and be successful in completing those courses. Offering corequisite support aligned with transfer-level coursework has been shown to increase success for students who need additional assistance compared to providing remedial coursework and is strongly encouraged to be made available to students, where needed, for all courses used to satisfy written communication and quantitative reasoning requirements to transfer, regardless of the department in which they are offered.

Since the implementation of the law, research has been conducted to address outstanding questions or misperceptions. The following practices should be included in colleges' equitable placement and completion implementation:

***Place and ensure enrollment of all students with high school data available into transfer-level courses, including students who may have been out of high school ten or more years.*** Research has found that high school grades remain valid ten years after high school completion, and perhaps beyond (data access is limited to ten years). Placement practices should treat such students the same & assure them the same rights to access. [Review the research brief here.](#)

***Place and ensure enrollment of all student groups, regardless of their background or special population status, using the Chancellor's Office high school GPA default placement rules. This includes, but is not limited to, DSPS, EOPS, Foster Youth, Veteran, Umoja, Puente, MESA and economically disadvantaged students.*** Research has found that for all student groups

(identifiable in MIS) direct placement into transfer-level courses maximizes one-year completion rates (i.e., throughput) when compared to being placed in pre-transfer level courses. For more details on each population [see the research brief here](#).

***Place and ensure enrollment of English Language Learners who graduated from a U.S. high school (or the equivalent) directly into transfer-level English or an ESL-equivalent transferable course.*** Research has found that ELL students who completed high school in the United States maximize throughput (i.e., have higher one-year course completion rates) when placed directly in transfer-level English composition or a transfer-level ESL course equivalent to English composition, with corequisite support as needed. [Review the research report here](#).

***Place students who have completed higher level math in high school into higher level mathematics courses based on their high school performance.*** Research has found that repetition of successfully completed courses is not associated with improved performance of the subsequent course and adds time to completion (e.g., [Sonnert & Sadler, 2014](#)). Based on such findings, it is recommended that colleges develop placement methods that encourage students who have successfully completed courses in high school (e.g., pre-calculus) to progress and start in the next appropriate course (e.g., Calculus I) at the college (and with support as needed). [Review Table 2 of the report here for one conservative method for doing so](#).

***Strongly consider placing students on BSTEM pathways who have not completed Algebra II in high school using the Chancellor's Office high school GPA default placement rules.*** Research has explored this question in detail and found that enrollment directly in transfer-level coursework maximizes students' throughput when compared to enrolling first in pre-transfer-level courses, even for students who have not successfully completed Algebra II in high school. Based on these findings, it is recommended that students without these courses in high school be placed directly in transfer-level coursework appropriate for their educational goal and major, with appropriate concurrent support where necessary, in order to maximize their likelihood of successfully completing that course. Possible concerns about articulation can be meaningfully addressed through the provision of intermediate algebra content needed to succeed via corequisite or other concurrent support. [Review the research report here](#).

***Carefully consider placing and ensuring enrollment of students who may not have completed high school but have completed at least the 10<sup>th</sup> grade using the Chancellor's Office high school GPA default placement rules.*** Based on research specifically conducted to explore this issue, prior Chancellor's Office guidance advised that "since the default placement rules were developed based on 11<sup>th</sup> grade GPA, students that have completed the 11<sup>th</sup> grade would fall under the default placement rules or the colleges adopted placement model for transfer level courses. Based on the results of the MMAP study, the default placement rules may be applied to students seeking enrollment in transfer-level courses; students who have completed 9<sup>th</sup> and 10<sup>th</sup> grade can be placed using the default placement rules and their cumulative GPA for the high school grade they have completed." Research has found that the performance of high school students in transfer-level courses was very similar to that of post-secondary students when disaggregated by the high school GPA bands in the default placement rules. The findings suggest that if colleges choose to extend the use of the default placement rules to students who are currently in the 10<sup>th</sup> and 11<sup>th</sup> grade, their performance and success rates should be at or above expected levels, particularly for students in the highest GPA band. [Review the research brief here](#).

## Required Action

By fall 2022, the California Community College system must complete full implementation of the law and associated regulations by ending all local placement practices explicitly prohibited by legislation and regulation, and by ensuring that all U.S. high school graduate students are placed into and enroll in coursework that maximizes the probability that they complete transfer-level math and English within a year of their start in the discipline.

With some limited exceptions (see summary overview above), this means that by fall 2022 all U.S. high school graduate students, both new and continuing, in certificate, degree or transfer programs, will be placed into and enroll in transfer-level English and math/quantitative reasoning courses (whether with or without support) where English and math requirements exist. Colleges are not being required to create new English and/or math requirements.

**Every college** will submit an *Equitable Placement and Completion Improvement Plan* to document changes in placement practices and curricular structures the college will implement to reach this goal. For colleges that have already reached this goal, reporting requirements are minimal. For colleges in transition to realizing this goal, plans will highlight a broader suite of strategies involving course options and availability, support structures, and professional development to consider. For colleges planning to maintain limited pre-transfer enrollments, plans will also include additional strategies designed to ensure AB 705 rights and protections for students. In the Improvement Plan, colleges will respond to a set of prompts based on how colleges intend to shift local communication, advising, course availability, placement, and support practices to fully implement Equitable Placement and Completion (AB 705). The plan also provides a set of promising practices to help inform local planning work for colleges to consider and indicate which will be implemented. Colleges are also strongly encouraged to invest in concurrent supports to ensure student success in gateway courses.

The Improvement Plan does not require the submission of data for colleges that will, by fall 2022, both **ensure transfer level placement** in math/quantitative reasoning and English for **all U.S. high school graduate students** and permit **no pre-transfer level enrollments**, including multi-term transfer-level courses, for students in certificate, degree or transfer programs.

For colleges that plan to continue placements and/or enrollments into pre-transfer level courses or multi-term transfer-level courses in fall 2022, the Improvement Plan requires completion of a Data Addendum to validate that such practices meet AB 705 standards. In the Data Addendum colleges will submit local data in an attempt to show completion is maximized for a specific program or student group that enrolls, by requirement or by choice, into pre-transfer level courses or multi-term transfer-level courses.

All California Community Colleges are to complete the enclosed Equitable Placement and Completion Improvement Plan **by March 11, 2022** using this link: [Link to Equitable Placement and Completion Improvement Plan Form](#). A pdf of this online form and an Excel data template are enclosed and will be reviewed during a webinar on Monday, November 29, 2021, 3:30-5:00pm on Zoom (see details below). Please review the form and template in advance of the webinar and come prepared to engage with Chancellor's Office leadership and MMAP/RP Group researchers on how to complete the form and template.

## **English as a Second Language (ESL) implementation**

By July 1, 2021, **all** California Community Colleges were to submit an AB 705 adoption plan for English as a Second Language (ESL) implementation detailing how ESL students are advised, assessed and placed (*including where all ESL instruction is noncredit*). Under title 5, §55522.5 *English as a Second Language Placement and Assessment*, ESL students with a goal of transfer to a four-year institution or an associate degree should enter and complete a transfer-level English composition course or an ESL course equivalent to transfer-level English composition within a three-year timeframe of declaring a transfer- or degree-seeking goal. Adoption plans were designed for colleges to explain the placement method, the evidence to be collected, and why the college/district believes it will be effective. Per title 5, §55522.5 (b)(2), students who have acquired a United States high school diploma or the equivalent should be placed according to §55522. Therefore, colleges'/districts' adoption planning and implementation should primarily focus on ESL students without a U.S. high school diploma or U.S. high school data (e.g., international students, adult immigrants, refugees, and F1 Visa students).

Implementation of AB 705 for ESL students began this fall, commencing the two-year experimentation and innovation window. During this innovation window, all [currently approved ESL assessments](#) remain approved for use, and are being re-evaluated by the Assessment Committee this academic year. Colleges should collect and review evidence on the effectiveness of their ESL placement including student completion of degree or transfer requirements in English (or equivalent ESL courses) via their campus research offices and make the data available to ESL departments for the purpose of determining the best placement options for credit ESL to fulfill the requirements of AB 705. Similar to what has been done for English and math, colleges' implementation of AB 705 for ESL students will be validated in spring 2023 by assessing progress to date and establishing the data needed to evaluate three-year course completion rates in alignment with the law. It is essential that colleges establish the resources and infrastructure necessary to support this important work which includes, but is not limited to, data and research support from local institutional effectiveness offices, and investment in assessment, the revision of curricular sequences for ESL students, and faculty professional development.

### **Next Steps**

It is essential that colleges maintain Equitable Placement and Completion (AB 705 and AB 1805) implementation as a top priority on campus. Implementation leaders and teams should be sustained and intentional focus given to this important work. There are a number of funding sources colleges can use to support this work including, but not limited to Guided Pathways funds, SEA funds, federal minority serving institutions grants, foundation support, and general funds.

Colleges can expect additional guidance upon the completion of an analysis of the ESL Adoption Plans and the AB 1805 forms and data submitted July 9, 2021. In addition to the November webinar to discuss the Improvement Plans, the Chancellor's Office will continue a series of webinars as part of an Equitable Placement and Completion Learning Series to support colleges as the CCC system continues to implement this historic reform and transform options and outcomes for our students.



### **Equitable Placement and Completion 2021-2022 Learning Series**

- July 12, 2021: [Board of Governor's Spotlight](#)
- August 4, 2021: System Webinar - *Leading Courageous Conversations about Equitable Placement* (recording in the VRC under the CCC | Webinars, Conferences, and Events community)
- September 8, 2021: [Transfer Level Gateway Completion Dashboard](#) (recording in the VRC under the Equitable Placement and Completion community)
- October 29, 2021 (2:00-3:00pm): RP Group/MMAP webinar - *Emerging Practices and Resources to Support ESL Placement and Throughput: Guided Self-Placement* ([click here to watch](#))
- November 5, 2021 (2:00-3:00pm): RP Group/MMAP webinar - *Emerging Practices and Resources to Support ESL Placement and Throughput: Innovations and Practices* ([click here to watch](#))
- November 29, 2021 (3:30-5:00pm): AB 705 Implementation Improvement Plans (see Zoom details below)
- Forthcoming: Curricular Reforms; Student Communication & Counseling; ESL Adoption Plans & Promising Practices

If you have questions about this guidance, please email [AB705@cccoco.edu](mailto:AB705@cccoco.edu).

You are invited to a Zoom webinar.

When: November 29, 2021, 3:30-5:00 PM Pacific Time

Topic: Equitable Placement and Completion Improvement Plans

Please click the link below to join the webinar:

<https://cccconfer.zoom.us/j/98052147255>

Or One tap mobile :

US: +16699006833,,98052147255# or +13462487799,,98052147255#

Or Telephone:

Dial(for higher quality, dial a number based on your current location):

US: +1 669 900 6833 or +1 346 248 7799 or +1 253 215 8782 or +1 301 715 8592 or +1 312 626 6799 or +1 646 876 9923

Webinar ID: 980 5214 7255

cc:

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CCCCO Staff

Attachments:

- Equitable Placement and Completion Improvement Plan Form
- Improvement Plan Data Addendum Template