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Admissions and Registrars Professionals
Institutional Research, Planning, and Effectiveness Professionals

FROM: Aisha N. Lowe, Ph.D., Executive Vice Chancellor
Office of Equitable Student Learning, Experience, and Impact (ESLEI)

RE: Required Action
AB 1705 Validation of Equitable Placement, Support and Completion Practices for
General Education and Non-STEM Programs

As a system we have made good progress toward achieving the goals of the [Vision for Success](#), and we have coalesced around the [Call to Action](#) for centering diversity, equity and inclusion in our work with students. At the heart of this work is an imperative to address structural barriers, policies and practices that contribute to inequity in student outcomes and stymy students' progress toward their academic goals. Effective implementation of Assembly Bill 1705 will ensure that our approaches to placement, enrollment and academic support produce strong and equitable completion of transfer-level English and math milestones. This remains a primary priority for the Board of Governors and all California Community Colleges.

Under AB 1705, colleges must ensure that students begin in English and math coursework that satisfies a requirement of their program unless the student is highly unlikely to succeed in that coursework and their likelihood of completing program requirements is improved by taking a prerequisite course. When the design of the college's placement, curricula, and enrollment management culminates in students enrolling in prerequisites outside of their program's requirements, AB 1705 requires colleges to validate the impact of this approach on students' progress in meeting gateway English and math milestones for their program.

These requirements were detailed in the [AB 1705 guidance memo](#) (December 2022) and in the [AB 1705 Implementation Guide](#) (March 2023). This guidance memorandum provides additional direction on the validation process for placement and enrollment practices described for Required Action #1 (transfer-level placement and enrollment–general education) and Required Action # 2 (transfer-level placement and enrollment–non-STEM programs), which are reproduced below and described in Education Code §78213, subsections (d), (e) and (i).

May 22, 2023

This guidance memorandum addresses:

- A reminder of shifts in local practice that should have already taken place per AB 705/1705
- The certification and validation process for non-STEM program transfer-level prerequisites (required action #2 below)
- Required action to submit an AB 1705 Validation of Equitable Placement, Support, and Completion Practices for General Education and Non-STEM Programs (each college will submit one form [using this link](#)).

Per Education Code [§78213](#), validation of non-STEM transfer-level prerequisites is due July 1, 2023. However, given the time of the academic year, the Chancellor's Office will collect this certification from colleges on a rolling basis from July 1, 2023, to September 1, 2023.

Completed AB 1705 Compliance in Local Practices

Given the mandates of AB 705 and AB 1705, there are a set of requirements colleges should have already completed or that must be completed by July 1, 2023 (as previously communicated in the prior guidance). The summaries below serve as a reminder of those required actions and correspond with the required actions in the implementation guide. For full details see the [AB 1705 guidance memo](#) (December 2022) and in the [AB 1705 Implementation Guide](#) (March 2023).

REQUIRED ACTION #1

By July 1, 2023, all United States high school graduates, and those who have received a high school equivalency certificate, regardless of background or special population status, who plan to pursue a certificate, degree, or transfer program, shall be directly placed into, and, when beginning coursework in English or mathematics/quantitative reasoning, enrolled in, transfer-level English and mathematics/quantitative reasoning courses. Education Code reference: §78213(i)

Pretransfer-level enrollment is only an option for students described in §78213 (j) as exceptions to transfer-level placement and enrollment and for whom enrollment in pre-transfer-level math or English maximizes their likelihood of completing transfer-level coursework as described in §78213 (d). Education Code references: §78213(d), (j)

By July 1, 2023, all colleges shall complete and certify one of two options:

- 1) discontinue pre-transfer-level placements and enrollments, or**
- 2) proactively restrict pre-transfer-level enrollments to the student populations described in the law.**

REQUIRED ACTIONS #3 AND #4, CONCURRENT SUPPORT, AND GUIDED PLACEMENT

As of July 1, 2023, colleges should also be in compliance with Required Actions #3 (non-repetition of high school math), #4 (appropriate use of non-credit), as well as the additional actions regarding concurrent support and guided placement processes described in the [AB 1705 Implementation Guide](#). These actions do not involve validation efforts and are therefore not the subject of this memo.

Colleges are encouraged to develop low unit or non-credit corequisite support for gateway math courses. As previously stated in the AB 1705 Implementation Guide, colleges may require enrollment in corequisite support for (1) students in the lowest high school GPA bands of the default placement rules or (2) students who have not previously completed prerequisite coursework to gateway transfer-level math.

Certification and Validation of Non-STEM Program Transfer-level Prerequisites

REQUIRED ACTION #2

Students shall begin in the transfer-level English and math/quantitative reasoning coursework that satisfies a course requirement for the student's intended certificate or associate degree or a requirement for transfer within the intended major. Education Code references: §78213 (e),(f),(g) and (i)(2)

By July 1, 2024, all colleges shall discontinue the enrollment of students into transfer-level prerequisites to gateway English or math coursework for non-STEM programs that do not satisfy a course requirement for the student's intended certificate or associate degree or a requirement for transfer within the intended major. Colleges can only continue to enroll students into transfer-level prerequisites to gateway English or math coursework for non-STEM programs that do not satisfy a course requirement for the student's intended certificate or associate degree or a requirement for transfer within the intended major if local data validates the benefit to students as described in the law and outlined below.

This current memo, [certification form](#), and validation template are provided for this certification and validation process. Timelines for STEM programs are offset by a year, for which additional guidance will be provided this fall.

To support and streamline the validation process, the Chancellor's Office commissioned an initial review of 2021-2022 college catalogs by the RP Group to identify non-STEM programs with transfer-level prerequisites to gateway English or math requirements.

The review did not find any programs for which gateway transfer-level English courses had a transfer-level English prerequisite. **However, colleges should verify this locally to ensure compliance.**

Relative to math, the review identified two areas for colleges to attend to:

A. Intermediate Algebra Prerequisites

The review identified a small number of colleges where an intermediate algebra prerequisite to a gateway transfer-level math course was replaced with a transfer-level math prerequisite, such as college algebra. In these cases, **colleges will need to discontinue the enrollment of students into the transfer-level prerequisite by July 1, 2024, or submit data through this validation process in an attempt to validate the prerequisite by completing the Data Submission Template provided (see below).**

B. Business Administration Calculus

The review also identified more than 40 colleges with a Business Administration degree where a business calculus or applied calculus course required for the degree had a transfer-level prerequisite of college algebra or precalculus or trigonometry, none of which satisfy course requirements for the program. These prerequisites also run counter to the C-ID descriptor for

Math 140, Business Calculus, which lists a prerequisite of intermediate algebra. To save colleges the time and effort of conducting a local validation study, the Chancellor's Office commissioned the RP Group to do a statewide study examining the impact of these prerequisites on calculus completion for students seeking a degree in Business Administration that requires calculus. The study compared students who began directly in the calculus course with those who started in any of the transfer-level prerequisites to calculus, controlling for level of high school math preparation. Based on this analysis, **for students pursuing a Business Administration degree who need calculus to meet program requirements, direct enrollment into any Business Calculus or any first calculus course in a calculus sequence, regardless of high school math preparation, results in higher calculus course completion within one-year (i.e., throughput) relative to enrollment in transfer-level prerequisites to calculus.** This statewide analysis shows that these transfer-level prerequisites to Business calculus do not meet AB 1705 prerequisite validation standards for Business Administration majors.

Based on these results, colleges have two options to choose from:

- 1) Colleges can discontinue the enrollment of Business Administration students into transfer-level prerequisites to calculus **by July 1, 2024.**
- 2) If colleges have local data to the contrary that shows that the prerequisite improves Business Administration students' completion of calculus for their program, colleges may choose to submit local data through the validation template provided with this memo **by September 1, 2023.** Local one-year completion analyses will be evaluated by the Chancellor's Office against the one-year statewide completion for students whose highest high school math was Geometry or a lower course who directly enrolled in Business Calculus, which is 47%. This is a very liberal benchmark given that students with higher levels of high school math preparation who directly enrolled in Business Calculus succeeded at higher rates.

There may be other cases locally of transfer-level prerequisites that do not satisfy course requirements for the program. Colleges should do an internal audit of non-STEM program requirements to identify gateway math courses that have a transfer-level prerequisite and make a decision in each case to either: (1) submit data to attempt to validate the prerequisite, or (2) discontinue the enrollments of students into the prerequisite.

Required Action

All colleges must complete a certification form for AB 1705 Validation of Equitable Placement, Support, and Completion Practices for General Education and Non-STEM Programs to report to the Chancellor's Office the college's compliance status. Each college must submit a certification form between July 1, 2023, and September 1, 2023.

The certification form asks colleges to certify how they are complying with Required Action #1 and how they intend to comply with Required Action #2. The certification form also provides colleges with the opportunity to submit local data in an attempt to validate the enrollment of students into transfer-level prerequisites that do not satisfy general education or non-STEM program requirements (as detailed above).

AB 1705 Validation of Non-STEM Transfer-level Prerequisites

May 22, 2023

Each college must submit one AB 1705 Certification Form to the Chancellor's Office by September 1, 2023 using this submission form: [**AB 1705 Validation for General Education and Non-STEM Programs**](#). A copy of this memorandum and a pdf of the certification submission form is linked at the top of the online form for reference purposes only (submit using the online form). Colleges should closely coordinate and ensure **one** form per college is electronically submitted to the Chancellor's Office. Multiple submissions from the same college will not be processed and colleges will be out of compliance with these required validations.

CERTIFICATION ATTACHMENTS

- [Maximizing Calculus Completion for Students Seeking the Business Administration Degree report](#)
- Link to certification submission form: [AB 1705 Validation for General Education and Non-STEM Programs](#).
- [AB 1705 guidance memo](#)
- [AB 1705 Implementation Guide](#)
- [AB 1705 FAQ](#)

CHANCELLOR'S OFFICE PROGRAM CONTACTS

Please direct inquiries regarding this guidance to the Chancellor's Office Educational Services and Support Division at ab705@cccoco.edu.

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