

TO: Chief Executive Officers
Chief Student Services Officers
Chief Instructional Officers
Academic Senate Presidents
Transfer Center Directors
Institutional Research, Planning and Effectiveness

FROM: James Todd, Vice Chancellor of Academic Affairs
Stacey Shears, Vice Chancellor of Student Services

RE: Student Education Plans and Equitable Transfer Guidance

PURPOSE

In accordance with [Education Code 78222 \(b\)\(4\)](#) and in response to the [Transfer Audit for California's Systems of Public Higher Education \(2023-123\)](#), this memorandum addresses [Recommendation 16](#) and [Recommendation 19](#).

- Recommendation 16 asks the Chancellor's Office to disseminate guidance so that transfer-intending students receive counseling and maintain current, comprehensive education plans that are accessible online and include potential transfer destinations; it also calls for direction on how online education planning systems can assist colleges in meeting these objectives.
- Recommendation 19 asks the Chancellor's Office to update its student equity plan template or annual report to require outcomes related to transfer goals, provide guidance for diagnosing root causes of transfer-related equity gaps, and help colleges evaluate the effectiveness of their initiatives.

BACKGROUND

The State Audit found that only about 21% of transfer-intending students (as defined by education goal) who entered community college from 2017-19 transferred within four years, with even lower rates for some regions and disproportionately impacted groups. This reinforces the need for timely education planning and transparent, equity-centered accountability.

Current title 5 regulations provide clear expectations for colleges and districts:

- Required services include assistance in developing a student education plan ([§55520](#)).

- Comprehensive student education plans must incorporate the student’s interest, career and education goal, major, potential transfer institution, the courses and requirements needed to complete the course of study, and they must be accessible, timely, and recorded electronically. The comprehensive plan should also include any needed referrals to other support and instructional services as appropriate. ([§55524](#)).
- Institutions must give non-exempt students a reasonable opportunity to develop a comprehensive plan and identify student responsibilities within that plan ([§55531](#)); and, districts may adopt limited exemptions by local policy ([§55532](#)).

Over the course of the last year, the Chancellor’s Office has proactively addressed the state transfer audit. Two actions, in particular, address Recommendations 16 and 19:

- The [2025-28 Student Equity Plan](#) (SEP) template was reframed by the statewide SEP Task Force. The new template includes two important additions that address recommendations 16 and 19, respectively. First, the new SEP requires colleges to monitor data and create strategies to equitably ensure students receive comprehensive education plans early—with a primary goal in the first semester and a secondary goal by the end of the first academic year (Section 12). Second, it centers transfer as a priority metric, asking colleges to analyze data and identify the root causes of why students do not transfer. It also requires colleges to identify strategies to remove transfer barriers, address student needs, and create clear transfer pathways (Section 10).
- In May 2025, the Board of Governors took regulatory action, updating title 5, §55524 to mandate that colleges (1) ensure education plans accurately reflect program progress, and (2) “to the maximum extent possible,” provide a comprehensive education plan to all non-exempt students in their first year. The proposed changes are awaiting final approval and filing with the Office of Administrative Law and the California Secretary of State. These pending regulatory changes are discussed in more detail in the “Next Steps” section of this memorandum.

GUIDANCE FOR RECOMMENDATION 16: COUNSELING ACCESS AND COMPREHENSIVE EDUCATION PLANS

Colleges should use Section 12 of their [2025-28 SEP](#) to document structural changes, initiatives, and action steps that aim to ensure every student—especially those intending to transfer—receives a comprehensive SEP early in their journey.

At a minimum, comprehensive education plans should (1) be recorded electronically and accessible online; (2) specify intended transfer destinations with degree/ADT/GE patterns; (3) include courses and requirements for program completion; and (4) be reviewed and updated when students change goals. Colleges should implement proactive identification and outreach to

students who lack current plans and use education-planning systems to surface requirements, schedule touchpoints, and support consistent, equitable delivery.

To accelerate progress on Recommendation 16, colleges should consider online education planning systems as the backbone of a proactive, equity-minded advising model:

- **Student Access & Engagement**
 - Transfer-intending students can view and update comprehensive education plans via mobile-friendly platforms.
 - Plans include intended transfer destinations and live articulation/major-prep requirements.
- **Advisor Support & Alerts**
 - Counselors and advisors receive automated alerts for students lacking plans or falling off sequence.
 - Dashboards surface gaps early to enable timely interventions.
- **Equity & Analytics**
 - Disaggregated analytics support strategies to address disproportionate-impact patterns at scale.

These capabilities form a foundation of support by:

- Ensuring plan accessibility and versioning.
- Embedding ADT/ASSIST-aligned transfer pathways in the plan builder.
- Integrating appointments, nudges, and degree audit tools.
- Requiring timestamped updates each term or upon major changes.
- Reporting plan completion and currency—disaggregated by student group—into MIS and student education plan workflows to drive continuous improvement by counselors and classified advisors.

GUIDANCE FOR RECOMMENDATION 19: CLOSING EQUITY GAPS IN TRANSFER

Colleges should use Section 10 of their [2025-28 SEP](#) to set measurable transfer goals for all students, including disproportionately impacted populations, and to identify institutional strategies to meet these goals. In doing so, colleges should first analyze the root causes of transfer gaps using disaggregated data and then describe strategies that will be employed to remove barriers and improve outcomes. College Student Equity and Achievement Annual Reports should tie activities and expenditures to outcome trends, evaluate initiative effectiveness, and adjust as needed. This comprehensive work should be coordinated across the campus, with Guided Pathways efforts, ADTs (including [auto-ADT placement](#)), counseling, financial aid, DSPS, EOPS, MESA, Veterans services, Transfer Centers, articulation offices, basic needs supports, and other services to build holistic transfer pathways.

To fulfill Recommendation 19 with urgency, colleges should embrace a disciplined, equity-first improvement cycle that both diagnoses why transfer gaps persist and evaluates what closes them. This begins with using statewide, regional, and local data assets to disaggregate outcomes by race/ethnicity, income, age, first-generation status, and other key characteristics, then analyzing the data from entry to transfer—especially in the 2025-28 SEP. Quantitative findings should be paired with qualitative inquiry—student and faculty surveys, focus groups, journey mapping, and case studies of “near-completers”—to uncover root causes, such as misaligned course sequences, unclear major-prep requirements, advising handoff breakdowns, or policy frictions such as holds, unit caps, course availability issues, or transfer application timing. Initiatives can then be developed, implemented, and evaluated with clear logic models and defined metrics: leading indicators (e.g., timely comprehensive ed plans, transfer-level math/English momentum) and lagging indicators (e.g., transfer within three years).

Resources such as the RP Group’s [Through the Gate](#) and [African American Transfer Tipping Point](#) studies provide evidence-based models, while other recent publications—[The Transfer Playbook 2.0](#) (Aspen Institute and CCRC), [Strengthening California’s Transfer Pathway](#) (PPIC), and [Tracking Transfer: Community College Effectiveness in Broadening Bachelor’s Degree Attainment](#) (CCRC, Aspen Institute, and NSC Research Center)—offer insights into promising practices and methods for assessing equity-minded reforms. Together, these publications and tools delineate strategic paths forward: lead with disaggregated evidence, investigate causes with students at the center, test improvements transparently, and scale only those strategies proven to narrow transfer gaps.

NEXT STEPS

To position districts for full compliance of anticipated regulatory changes aimed at increasing equitable transfer rates, colleges can begin by ensuring alignment of local policy and practice with [Education Code 78222 \(b\)\(4\)](#) and the ADT Placement Requirement ([ESS 23-41](#)). Additionally, colleges can prepare operationally for the [pending updates to title 5 §55524, §55530, and §55531](#) by building their capacity to deliver complete comprehensive education plans—covering the student’s full course of study and transfer goal—by the end of the first academic year, *to the maximum extent possible*. This may include redesigning intake, orientation, and first-term touchpoints so planning is the default, shifting responsibility for plan creation and maintenance from students to the institution, and establishing a standard of regular review when goals or majors change. (The proposed regulation changes for §55524, §55530, and §55531 have been adopted by the Board of Governors and are pending final approval and filing with the Office of Administrative Law and the California Secretary of State. Once regulations are officially chaptered, guidance on the timeline and implementation of the updates will be provided.)

Colleges and districts should plan to modernize the infrastructure for education plans. While the proposed regulatory requirement for electronic education plans is that they are regularly updated

to “accurately reflect program progress” (§55524), colleges may also adopt and configure online education planning systems to serve as the backbone of advising.

In regard to statewide reporting, colleges and districts should ensure their education planning system provides clear, accurate, and timely data for COMIS: colleges and districts should map local fields to the [updated SS09 definition](#) and run monthly quality checks (missing/invalid plans; stale timestamps; etc.).

CONTACTS

For questions or additional guidance on any of the information within this memo, please contact the Student Equity and Achievement Program Team at SEAProgramInfo@CCCCO.edu or Transfer Support Team at Transfer@CCCCO.edu.

Thank you for your continued commitment to student success and equitable outcomes across our system.

cc: Sonya Christian, Chancellor
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