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Executive Director

September 18, 2017

The Honorable Governor Brown  
c/o State Capitol 1173  
Sacramento, CA 95814

**Subject: Oppose AB 705 (Irwin, 2017) Seymour-Campbell Student Success Act of 2012: Matriculation: Assessment**

Dear Governor Brown:

The Academic Senate for California Community Colleges (ASCCC) is writing to express its opposition to AB 705 (Irwin). While we recognize and support curricular innovation and the importance of multiple measures for accurate placement of students, we have concerns with specific provisions of the bill and its implementation. The Academic Senate has communicated with Assemblymember Irwin's office since February 2017 regarding our concerns. We are grateful for Assemblymember Irwin's willingness to collaborate with us to reach solutions, and through this collaboration we have been able to address a number of our concerns in several areas of the bill. Unfortunately, additional concerns have been identified as faculty from across the state continue to discuss the bill.

The Academic Senate has identified specific concerns with subsection 78213 (d)(2), which states the following:

*Notwithstanding Section 78218 or any other law, a community college district or college shall not require students to enroll in remedial English or mathematics coursework that lengthens their time to complete a degree unless placement research that includes consideration of high school grade point average and coursework shows that those students are highly unlikely to succeed in transfer-level coursework in English and mathematics.*

We are concerned that this language may affect Title 5 §55003, Policies for Prerequisites, Corequisites, and Advisories. Currently, college curriculum committees are required to use rigorous content review when applying the appropriate standards that demonstrate students are highly unlikely to succeed in a course without the prerequisites or corequisites. Content review establishes a prerequisite by analyzing the exit skills that students obtain from one course and comparing those skills to the entry skills that students need to be successful in a subsequent course. Students may demonstrate readiness for the course by either successfully completing the prerequisite course or through assessment for placement using multiple measures. The Academic Senate is concerned that the language in AB 705 could be interpreted to supersede current regulation.

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In order to conduct the placement research required by AB 705, colleges may be forced to remove prerequisites from courses, collect data on failure rates, and then re-impose prerequisites. In other words, colleges could be put in the position of taking actions that would harm current students in order to complete the required research necessary to demonstrate the need for a prerequisite that would benefit future students. The goal of improving student success does not align with the current language in the bill and appears to be in contrast with the numerous Academic Senate publications and positions supporting the use of multiple measures in the assessment for placement of students to best meet the needs of our students.

The Academic Senate had requested that Legislative Counsel provide an opinion regarding subsection 78213 (d)(2) to clarify how this section might interact with current Title 5 regulation through Assemblymember Irwin's office. However, this request was not accomplished within the required timeframe. Subsequently, the ASCCC offered an amendment to clarify by adding the following two sentences to the subsection: *[T]his provision does not alter or invalidate procedures and criteria for implementing prerequisites that have been established by the board of governors. If there is a contradiction between a stated prerequisite and a student's multiple measures placement, then the student has demonstrated the ability to succeed and should be allowed access based on the multiple measures.* Unfortunately, this amendment was not adopted, and the ambiguity of the subsection's impact on curricular processes remains.

In addition to our primary concerns stated above, the Academic Senate is concerned with how this bill will be implemented. The January 2018 start date is problematic in that colleges are already preparing their catalogs for the next academic year at this time. In addition, the language in AB 705 states, "*placement models selected by a community college demonstrate that they guide English and mathematics placements to achieve the goal of maximizing the probability that a student will enter and complete transfer-level coursework in English and mathematics within a one-year timeframe.*" Already, this statement is being interpreted as mandating that students complete transfer-level coursework within one-year. For some students, this goal is not realistic without intensive and focused remediation such as the START program offered by the City and University of New York, CUNY, that requires 25 hours per week for one semester to cover both pre-college mathematics and pre-college reading/writing.<sup>1</sup> Such a commitment may be pedagogically sound but would severely limit access for many of our students who enroll part-time for very real fiscal or familial reasons.

The goal of remedial education reform and improving assessment for placement of students by using multiple measures more effectively in our system are completely aligned with the positions of the ASCCC. However, the details of AB 705 are problematic in too many areas for us to support the implementation schema proposed in the language. We do support language such as that found in AB19 (Santiago, as of September 8, 2017) that directs the California Community

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<sup>1</sup> <http://www2.cuny.edu/academics/academic-programs/model-programs/cuny-college-transition-programs/cuny-start/about-cuny-start/>

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Colleges to utilize “*evidence-based assessment and placement practices at the community college that include multiple measures of student performance, which shall include, among other measures, overall grade point averages, including grades in high school courses, and using evidence-based practices to improve outcomes for underprepared students.*” The ASCCC remains committed to working with faculty, system partners, and the Chancellor’s Office to improve outcomes for students.

**For these reasons, the Academic Senate for California Community Colleges expresses its reluctant opposition to AB 705 (Irwin, 2017).** We would welcome a revised bill that clarified the distinction between the matriculation process and the curricular process and improved language regarding implementation challenges. Should you have any questions, please feel free to contact us.

Sincerely,



Julie Bruno  
President  
Academic Senate for California Community Colleges

pc:  
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