April 12, 2023

The Honorable Mike Fong
California State Assembly
1021 O Street, Suite 6210
Sacramento, CA 95814

RE: AB 811 (Fong) - CONCERN
As Introduced February 13, 2023

Dear Assemblymember Fong,

As organizations committed to educational equity and student success, we write with concern for Assembly Bill 811 (Fong). We have worked as a collective to improve higher education access and success for all students and fear that this legislation, while well-intentioned, could have unintended consequences for California Community Colleges (CCC) students, particularly low-income students and students of color.

We are a diverse coalition of higher education equity, research, civil rights, social justice, and student leadership organizations committed to ensuring all California community college students are supported to reach their college goals. CCC play a significant role in access to higher education for over two million Californians seeking an educational foundation that will prepare them to transfer to a four-year university or to participate in the workforce. Nearly two-thirds (65%) of California undergraduates are enrolled in the CCC and more than half of first-time students from all racial/ethnic backgrounds in the state enrolled in the California Community Colleges. This is why we are invested in policies that impact
community college student access and success and unfortunately, we write to express the following concerns:

I. *Impact on Time-to-Degree, College Costs and Financial Aid.* With about 80% of community college students indicating they desire to obtain a bachelor’s degree or higher, it is critical to maintain focus on what is most important for obtaining their higher education dreams. Allowing students to repeat, no less than five times, a credit course for which the student previously received a unsatisfactory grade and to repeat, no less than three times, a credit course for which the student previously received a satisfactory grade for enrichment and skill-building purposes, could have a significant impact on those college aspirations, including time-to-degree and college affordability. Taking extra time and credits to earn a degree is costly and makes college less affordable. The longer students are enrolled in college, the more they will pay for tuition, fees, living expenses, books, and other education-related expenses. Students also forgo potential wages they could have been earning because they are still in school and not in the workforce. Despite enrolling the majority of California's college students, CCC already struggle to ensure the vast majority of students achieve their college goals. Systemwide, only 22% of students enrolling in the CCC earn a degree or certificate within four years, and only 14% of Black students, and 18% of Latinx and Native Hawaiian Pacific Islander students graduate within four years².

Additionally, even when taking financial aid into account, the lowest-income students in California often cannot afford the full cost of college attendance; when these students take unnecessary coursework it expends their already limited financial aid and increases their likelihood of reliance on loans or other means to cover college costs. Evidence shows that repeating credit courses is costly for community college students, especially for low-income students. For instance, CCC students who begin in remediation accumulate significantly more units than required for their program and up to $20,000 in additional costs if they eventually complete an associate degree or transfer to a university.³ Repeating credit courses will also impact students’ financial aid lifetime eligibility limits, which limit the number of years and/or units that can be covered by financial aid programs. Lifetime eligibility limits for some forms of financial aid can be put at-risk due to the additional cost of more coursework, making it less likely that a student will be able to cover costs through to completion.

II. *Disproportionate Impact on Black, Latinx and Low-Income Students.* Data tells us that Black and Latinx students have disproportionately been impacted by policies requiring the repetition of credit courses. Despite the successful impact of new equitable placement and completion policies on student success⁴,⁵, at colleges that still have not fully implemented these policies, we see Black and Latinx students continue to be placed in remedial courses at higher rates than other student groups.⁶ Reimagining CCC remedial education (AB 705, 2017) was needed due to

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¹ Community College Review, *Why don’t More Community College Students Transfer to Four-Year Schools*
² Campaign for College Opportunity, *Higher Education in California: An Introduction to the State’s Public Colleges & Universities*
³ The Institute for College Access and Success (TICAS), *The Detrimental Costs of Remedial Education for California Community College Students*
⁴ Public Policy Institute of California (PPIC), *Community College Math in California’s New Era of Student Access*
⁵ PPIC, *Community College English in California’s New Era of Student Access*
⁶ California Acceleration Project (CAP), *Nearly There: Large Scale Improvements in Math Implementation of AB 705*
overwhelming research that found despite its intent, it was an ineffective policy, driving over 75% of incoming college students into remediation, and with every remedial course required, reducing a student’s chance of completing English/math degree requirements. Repetition of credit courses will be no different in disproportionately requiring and encouraging Black and Latinx students to repeat credit courses they have successfully completed.

III. **Reversing Proven, Evidence-Based Policies.** While we understand it is not the intent of AB 811 to impact recent, historic reforms made to CCC remedial education policy, there is cause for concern that this bill will reverse evidence-based strategies and policy changes the state and CCC system have invested in over the last eight years to address structural barriers to student success and that are driving racial equity gaps. Extensive research has found, and the early findings of equitable placement and completion reforms tell us, that **students have much higher completion when support is provided while they take transfer-level courses** – an approach called corequisite remediation – rather than in remedial prerequisite courses. Instead of allowing students more opportunities to repeat a class that they have been unsuccessful in, we should focus on ensuring all colleges are fully implementing equitable placement and completion policy which aims to **ensure every student is receiving the support they need upfront to be successful in that class.**

Last year, the state did just that by strengthening state policy and pairing that with a $64 million state budget investment in the CCC Equitable Placement and Completion Grant Program to support colleges in implementation. This policy change is working for students, and we fear AB 811 will send a mixed message to colleges and stall progress on full implementation.

While well intentioned, in its current form, AB 811 has the potential to cause more harm to students by delaying their educational goals, increasing college costs and impacting financial aid eligibility, disproportionately impacting low-income, and students of color, and reversing evidenced-based strategies that work for students. The state has taken bold action in recent years to help ensure our higher education system moves to a greater student-centered approach, shifting from students having to prove their worth, to the institutions being obligated to meet students where they are and support them in meeting their academic goals. It is critical to maintain this momentum and to fully realize policy changes that will have the greatest chance to help students make progress toward their college goals.

We respectfully urge you to consider these concerns and unintended consequences.

Sincerely,

Campaign for College Opportunity
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Vice President of Policy and Advocacy

The Education Trust–West
Natalie Whearfall-Lum
Director of P-16 Education Policy

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7 PPIC, *Preparing Students for Success in California’s Community Colleges.*
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