



## **ANALYSIS OF CALIFORNIA COMMUNITY COLLEGES STUDENT EQUITY PLAN POLICY**

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**FEBRUARY 17, 2015**

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## STUDENT EQUITY PLAN TIMELINE 1985-2014

1985 California Community Colleges' Board of Governors (BOG) symposium on the "Enrollment, Retention, and Transfer of Minority Students"

1989 BOG establishes Board Committee on Equity and Diversity

1991 California Legislature requires public institutions of higher education "to provide educationally equitable environments which give each Californian, regardless of ethnic origin, race, gender, age, disability, or economic circumstance, a reasonable opportunity to develop his or her potential"

### INTRODUCED

1992 BOG introduces Student Equity Policy

1996 BOG makes receipt of state funding contingent on having a Student Equity Plan (SEP)

### REQUIRED

2002 BOG requires community colleges to develop SEPs

2005 BOG requires community colleges to update and complete SEPs

### SUSPENDED

2008 BOG suspends SEP requirement

2010 Academic Senate of the California Community Colleges (ASCCC) releases updated guidelines for developing SEPs

2011 BOG creates Student Success Task Force

2012 Student Success Act of 2012 (SB 1456) passes; requires coordination of Student Success and Support Program and SEPs

2013 California Community College Chancellor's Office (CCCO) convenes Student Equity Workgroup

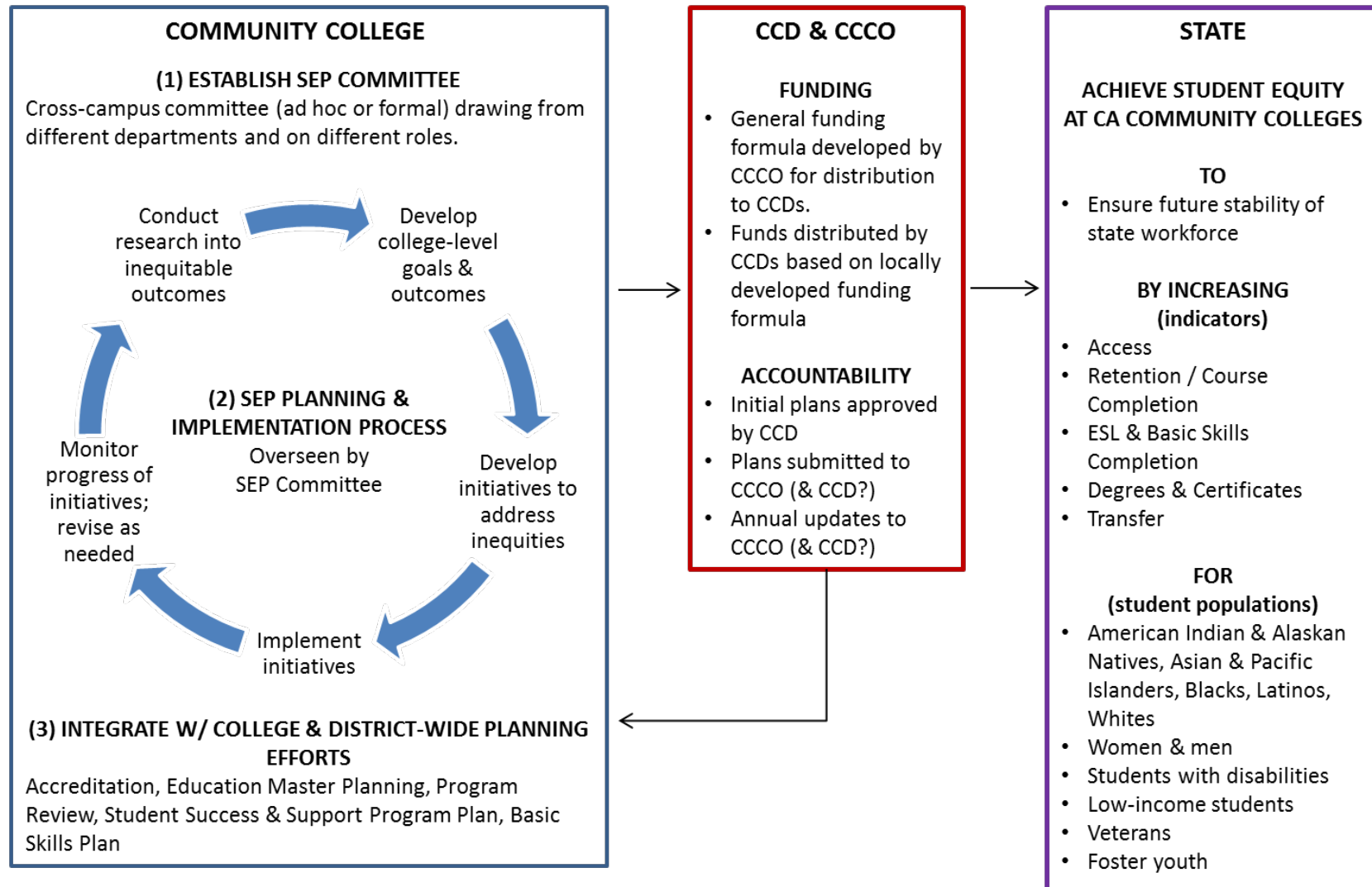
### REINSTATED; FUNDED

2014 CCCO releases revised SEP guidelines  
Governor's 2014-2015 budget provides \$70 million to support SEPs

**EQUITY: CHANGING DEFINITIONS AND TARGET POPULATIONS**

BOG Student Equity Policy (1992)	ASCCC Student Equity Statement (2010)	CCCCO Student Equity Plan Guidelines (2014)
<p>“composition of students who enroll, are retained, transfer, or achieve their occupational goal <b>mirrors the diversity in the state’s adult population</b>”</p>	<p>“equitable does not mean equal, but it does require that the results are <b>close enough to the percentages of the original cohort group to be acceptable</b>”</p>	<p>Follows BOG guidelines, for example:</p> <p><b>Access:</b> The percentage of each population group that is enrolled compared to that group’s representation in the adult population within the community served.</p> <p><b>Completion:</b> The ratio of the number of credit courses that students, by population group, complete compared to the number of courses in which students in that group are enrolled on the census day of the term.</p> <p><b>Transfer:</b> The ratio of the number of students by population group who complete a minimum of 12 units and have attempted a transfer level course in mathematics or English, to the number of students in that group who actually transfer after one or more (up to six) years.</p>
<ul style="list-style-type: none"> <li>- Ethnic minorities (American Indians or Alaskan natives, Asians or Pacific Islanders, Blacks, Hispanics)</li> <li>- Women</li> <li>- Persons with disabilities</li> </ul>	<p>“All student cohort groups” including</p> <ul style="list-style-type: none"> <li>- Ethnic minorities</li> <li>- LGBT students</li> <li>- Persons with disabilities</li> <li>- Men and women</li> <li>- Economically disadvantaged</li> </ul>	<ul style="list-style-type: none"> <li>- Ethnic minorities</li> <li>- Whites</li> <li>- Men and women</li> <li>- Persons with disabilities</li> <li>- Economically disadvantaged</li> <li>- Veterans</li> <li>- Current and former foster youth</li> </ul>

## STUDENT EQUITY PLAN (SEP) GENERAL THEORY OF ACTION



**STUDENT EQUITY PLANS:  
THE GOOD AND THE NOT-SO-GOOD**

THE GOOD	DESIGN ELEMENT	THE NOT-SO-GOOD
The SEP makes it possible to address inequities that can emerge with any student group.	FOCUS ON ALL STUDENT GROUPS	That said, inequities are typically suffered by students who are traditionally underrepresented in higher education, i.e. racial and ethnic minorities. An all-student focus minimizes the influence of history and institutionalized discrimination on the perpetuation of inequitable outcomes.
The guidelines push colleges to form committees with broad representation from different campus areas.	STUDENT EQUITY COMMITTEES	While broad representation brings different voices to the table, it does not ensure that those on the committee possess the knowledge and expertise to address equity.
Calculating disproportionate impact helps establish a common foundation on which colleges can base their efforts to close equity gaps. In addition, it alleviates the reliance on anecdotes to inform next steps.	DATA-INFORMED ANALYSIS	The manner in which disproportionate impact is calculated, particularly the 80% index, can mask equity issues.
Similar to the BSI initiative, the SEP relies on local practitioner knowledge and agency to address equity issues.	PRACTITIONER INQUIRY	Relying on practitioners, while important for sustaining equity efforts, requires practitioners with equity expertise.
Integrating the SEP with institutional plans encourages colleges to create a coherent framework for student success initiatives.	INTEGRATION WITH INSTITUTIONAL PLANNING	The guidelines are silent on how colleges should integrate the different plans they are tasked with developing and implementing.
\$70 million is a significant investment that symbolizes the state's commitment to student equity.	FUNDING	State funding, however, is currently only guaranteed for one year. Also, the vague funding guidelines suggest that funds can be used to support any effort reasonably justified as related to student equity planning, activities, and outcomes. Finally, funding is not explicitly tied to the achievement of equity goals.
With 112 community colleges, autonomy is needed for colleges to develop SEPs that make sense of their contexts.	AUTONOMY	However, this autonomy can result in colleges "gaming" the system, such as proposing efforts that superficially address their equity issues, or producing "laundry list" of loosely related activities.
The CCCCO requires all community colleges to submit reports on the student equity planning process on an annual basis.	ACCOUNTABILITY AND OVERSIGHT	Some perceive the CCCCO as a weak governing body, which begs the question of whether colleges will be held accountable for implementing their SEPs and using funds in ways that achieve their equity goals. Also, it is unclear whether colleges are required to report on progress toward their equity goals.

## **SUMMARY: WHAT DOES THE STUDENT EQUITY PLAN AMOUNT TO?**

As a state-level policy tool, the Student Equity Plan creates an opportunity for the California Community Colleges to more seriously examine whether and to what extent inequitable student outcomes exist on their campuses. The funding provided by the Governor's budget helps ensure that colleges will be able to address the issues uncovered from data analysis and inquiry.

**HOWEVER, the way in which the SEP is designed and managed can make it a missed opportunity.**

State funding, while generous for the current fiscal year, has not to date been guaranteed for a longer time period. As an issue with which higher education policymakers, practitioners, and researchers have long wrestled, achieving equity at the California Community Colleges requires continued financial commitment from the state, until such time that student outcomes improve and disproportionate impact is reduced.

The loose guidelines, weak accountability, and implicit assumption that community college practitioners are well-equipped to deal with equity issues *without appropriate professional and leadership development* are especially challenging aspects of the SEP.

No less important to note is how "equity" is framed as a rational, technical, and/or bureaucratic problem that can be solved by (1) conducting campus-based research, (2) using findings from that research to set goals and inform next steps, (3) implementing those next steps, (4) evaluating the next steps, and (5) continuing this cycle of "improvement."

Whether acknowledged or not in the SEP guidelines, equity is a complex phenomenon that not only requires rational, solution-based approaches, but a deep engagement with (1) the different meaning(s) equity can take, (2) the institutional and potentially discriminatory policies and practices that contributed to the inequities described in the campus data, and (3) the broader socio-historical factors that have and continue to shape the educational outcomes and experiences of students traditionally underrepresented in American higher education.

**THUS, for the SEP to achieve its goal of eliminating "disproportionate impact" and for equity to be sustained, community colleges will need to approach their SEPs as more than a bureaucratic, check-the-box exercise, even though the system in place allows them to simply go through the motions.**

## RECOMMENDATIONS FOR STATE- AND POLICY-LEVEL ACTION

Reaffirming the importance of student equity, reinstating the SEP, and making categorical funding available are critical to achieving equity in student outcomes at the California Community Colleges. These elements, however, are not sufficient.

### **The success of the SEP demands continued state investment and close attention to equity efforts within community colleges.**

As such, state officials could

- Undertake the efforts necessary to make funding for student equity plans a feature of the state budget for a minimum of three years (since SEPs cover a three-year period), but ideally for a longer period of time. Guaranteed funding enables community colleges to implement short- and long-term strategies that are needed to mitigate disproportionate impact.
- Bolster the accountability function of the CCCCCO, which may entail additional staff and training (i.e. capacity building).
  - Currently, only one staff member oversees the SEP at the Chancellor's office. That staff member also bears responsibility for SSSP.
  - To meaningfully review 112 SEPs, more staff are needed.
  - Furthermore, CCCCCO staff need to be adequately trained such that their review does not resemble a rubber-stamp process.
- Ask the CCCCCO to develop more detailed plan and expenditure guidelines.
  - Currently, the guidelines for developing SEPs and for spending monies are open-ended and vague. For example, the guidelines state that colleges can use funds for "in-state travel in support of student equity," but offer no further details on what constitutes an appropriate student equity activity or effort.
  - The effect of ambiguous guidelines could be a laundry list of loosely related equity activities and efforts. Further compounding this possibility is the weak accountability offered by the Chancellor's office, which could result in the approval of plans and budgets that do not adequately align with the goal of actually eliminating disproportionate impact.
  - The state could encourage the CCCCCO to prioritize the eligible expenditures and activities. For example, the CCCCCO could prioritize funding for professional and

leadership development for equity to help develop community college practitioners' capacity for this work.

- Require the receipt of state funding to be contingent on colleges' progress in implementing SEPs *and* progress towards achieving equity goals.
  - Currently, the CCCCO requires colleges to submit annual updates/reports on SEP progress.
  - Mandating colleges to report on whether and to what extent they are eliminating disproportionate impact could increase the accountability that they have towards achieving equity.
- Revise the funding formula such that allocation criteria also account for disproportionate impact and the progress towards mitigating it.
  - Currently, the funding formula is based on annual FTEs (40%); high-needs students (Pell-grant recipients) (25%); educational attainment in service area (10%); participation rate (student enrollment between ages 18 and 24) (5%); poverty rate (18%); and unemployment rate (2%).
  - While these criteria take into account a range of factors that could be associated with the persistence of inequities at community colleges, none are directly linked to the primary focus of the SEPs: equity.
  - Now that colleges have completed their studies of disproportionate impact (as reported in their SEPs), it may be possible allocate funds based on the greatest equity needs.
- Provide community college districts with funds to evaluate the outcomes and implementation of SEPs.
  - Determining whether, to what extent, and how community colleges mitigate disproportionate impact is crucial to knowing if the state is meeting its goals.
  - Moreover, this evaluation could help establish SEPs as a model for other community college systems seeking to achieve equity in educational outcomes (assuming they are in general successful).