

DOCUMENT RESUME

ED 395 627

JC 960 378

TITLE Scope, Implications, and Impact: The Academic Senate for California Community Colleges' Response to the Proposed CSU Policy To Eliminate Remedial Education for Entering Undergraduate Students.

INSTITUTION California Community Colleges, Sacramento. Academic Senate.

PUB DATE Nov 95

NOTE 16p.

PUB TYPE Viewpoints (Opinion/Position Papers, Essays, etc.) (120)

EDRS PRICE MF01/PC01 Plus Postage.

DESCRIPTORS Academic Standards; *Access to Education; Accountability; *Admission Criteria; Community Colleges; Diversity (Institutional); Economic Impact; Educational Change; *Educational Finance; Educational Policy; Higher Education; Intercollegiate Cooperation; *Remedial Instruction; Two Year Colleges

IDENTIFIERS *California Community Colleges; *California State University

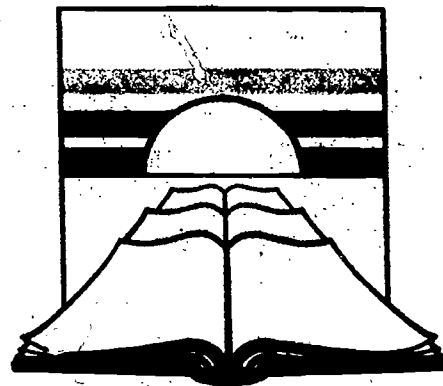
ABSTRACT

In November 1994, the California State University (CSU) system developed a proposal to eliminate remedial education for entering undergraduate students, offering this proposal as a solution to raise the system's standards. However, the CSU has presented no research showing evidence of the problem that the proposal is intended to solve. Further, while the CSU presumably holds K-12 and community colleges accountable for the availability of students prepared to enter college-level English and Math, the system has not held itself responsible for accurately determining the status of enrolled students. Placement tests used by the CSU to determine students in need of remediation do not reflect state standards set for English and mathematics curricula, with only approximately one-third of the students taking the English and approximately one-fourth of the students taking the mathematics placement test in 1993 performing at college-ready levels. It is uncertain whether the system has the authority to unilaterally make such a programming decision, and the process was undertaken without coordination with other segments of public education in California. Finally, implementation of the proposal would have a considerable impact on the number of students seeking remedial coursework at the community colleges, placing further strain on resources at the colleges, and could affect diversity at CSU campuses. Recommendations for addressing these issues are included. (TGI)

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*Academic Senate
for
California Community Colleges*

Adopted November 1995

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**Scope, Implications, and Impact:
The Academic Senate for California Community Colleges
Response to the Proposed CSU Policy to Eliminate Remedial
Education for Entering Undergraduate Students**

1995-1996

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Introduction: CSU Proposal

At the November 1994 meeting, the California State University (CSU) Board of Trustees' Committee on Educational Policies discussed the history, cost, and issues surrounding precollegiate instruction in the California State University (CSU). In January 1995, the Workgroup on the Under Prepared Student presented a report on precollegiate instruction in the CSU. The report concluded with ten recommendations aimed at improving the effectiveness of, and reducing the need for, remedial/developmental education on the CSU campuses.

The following resolution was adopted by the CSU Board of Trustees (herein referred to as the Board) in January 1995.

RESOLVED, by the Board of Trustees of the California State University, that the recommendations 1 through 10 of the Committee on Educational Policy be endorsed, and that the work of the workgroup on the Under Prepared Students be supported and encouraged, with the expectation that additional recommendations will be forthcoming to improve the effectiveness of and reduce the need for remedial/developmental activities on California State University Campuses.¹

In July 1995, the Board received from the sub-committee on Remedial Education recommendations for policy revisions and related actions which would implement the proposal previously endorsed. The policy would be changed to read:

"Effective with the Fall term in the year 2001, it will be a condition of admission to the California State University that entering undergraduate students must demonstrate readiness to undertake college level instruction in English and mathematics."²

Five public hearings were scheduled between September 21, 1995 and November 3, 1995 to solicit reactions from the public, K-12, and the community colleges. According to Peter Hoff, Senior Vice Chancellor of Academic Affairs of the CSU, "These hearings will help shape the

¹California State University Committee on Educational Policy, Precollegiate Instruction in the CSU, (January 1995) p.23

²California State University Committee on Educational Policy, Report of Subcommittee on Remedial Education, (July 1995) p. 4-5

*policy direction that will be considered by the Board of Trustees at the January 1996 meeting.*³

The purpose of this paper is to address the scope and implications of the CSU proposal to eliminate remedial education to entering undergraduate students. Issues related to public policy, access, resources, assessment/placement practices and diversity will be addressed. Finally, this paper serves to offer recommendations concerning the proposal to the CSU and to the California Community Colleges.

The Problem

A review of the literature originating from CSU asserts their presumption that *"...a public institution such as the California State University, which admits only the upper one-third of the high school graduating class and students who have succeeded in community college, would not admit many students who are not fully prepared for college work."*⁴ Public presentations elude to the need to raise the standards of the university, based on conclusions drawn from anecdotal situations. Notwithstanding this "presumption," CSU has not established the problem for which the proposed solution is intended. Ultimately, who or what purpose is served by the proposed policy has not been substantiated by CSU.

CSU has not evidenced research related to: a) time to degree for the student in remedial education, b) program effectiveness of remedial or developmental education, c) success of students in the remedial education and the validity of such placement, d) the number of students who succeed in remedial education the first time, e) the number of students in need of repeated remediation, f) the overall effectiveness of the graduate of CSU. Consequently, the anecdotal situations take on a greater significance than they should be afforded, compromising the development of sound educational policy.

The University's discussion of the small amount of resources dedicated to precollegiate instruction, the change in student population to be at the average age of 25, with family and job responsibilities, and members of the "new majority" support a conclusion and proposal converse to the proposed policy.

Accountability

The proposed policy and surrounding discussions explicitly hold K-12 and the community colleges accountable for the availability of students prepared to enter college level English and Math. However, the CSU has not held themselves accountable for determining the accuracy of

³California State University Chancellor's Office Memo, Peter S. Hoff, Public Hearings on Trustees Remediation Proposal, (August 28, 1995) p.1

⁴Precollegiate Instruction in the CSU, p.2

the status of the students in their institution. Before proposing a policy with far reaching implications, it is essential that the premise upon which CSU bases its conclusion is true. Absent consideration of their own effectiveness as a teaching institution, and of the accuracy of the assessment and placement practices, CSU cannot assert a true premise and therefore misses the opportunity to undergo some logical steps in problem solving: 1) assessment; 2) identification of the problem; 3) planning; 4) implementation; 5) evaluation. Consequently, the solution has a greater propensity to be illogical and inaccurate.

Remedial Education, Assessment, and Placement

Definition of Remedial/Developmental Coursework

CSU categorizes precollegiate skills instruction as either remedial or developmental. The distinction to be made between remedial and developmental is based on whether a student who arrives at the CSU has ever been fully exposed to instruction in preparatory college English and Mathematics. A remedial student would be one who has had instruction in college preparatory English and Math, but for whatever reason, needs to receive the instruction again in order to be prepared for college courses.⁵ A developmental student would be one who has not ever been exposed to college preparatory instruction.⁶

According to the Remediation Taxonomy developed by the 1987 Master Plan Review Commission, examples of Math courses identified as university level include Calculus, Pre-Calculus, and Analytical Geometry. While college credit is sometimes offered for the courses in College Level 1, courses in this level of instruction are sometimes categorized as remedial. Examples include Advanced Algebra, Intermediate Algebra and Trigonometry.⁷ Therefore, a gross generalization could be that students not prepared at the Calculus or Analytical Geometry level are placed in remedial courses. This point is emphasized in light of the various connotations and denotations the word remedial raises.

The word "remedial" should therefore, not be construed to indicate an ill-prepared, academically and intellectually challenged individual. Instead, in the context of the CSU proposal discussion, the term is used to describe students in the top one-third of their graduating high school population who may need precollegiate coursework in either mathematics, English, or both. Along with the numerous success stories of physicians, engineers, lawyers, and academicians, CSU has currently on the faculty, people who as CSU students, required remedial coursework, and went on to complete their studies.

Assessment and Placement:

⁵Precollegiate Instruction in the CSU, p.4

⁶Precollegiate Instruction in the CSU, p.4

⁷Precollegiate Instruction in the CSU, Appendix A

There are various processes for assessing and placing students in English and Math at the CSU. Students entering who have met a CSU determined cut-off score on the Scholastic Aptitude Test (SAT) or the American College Testing Examination (ACT) are eligible to enroll in college level English and Math. Students may be exempt from testing if they have taken appropriate courses at other institutions of higher education. Students not eligible by the SAT, the ACT, or previous course work, are tested with the English Placement Test (EPT) and the Entry Level Mathematics Test (ELM).

In 1993 of the 15,481 students assessed with the EPT, approximately one third (5,358) performed such that they could be considered ready for college level English.⁸ During the same year, of the 16,339 students assessed with the ELM, approximately one fourth (4,166) performed such that they could be considered ready for college level math.⁹

The *California Framework for Mathematics and the English-Language Arts* was designed to identify the framework for curriculum for Mathematics and English respectively. Existing discrepancies between the "Framework" and the assessment testing, suggest a failure on the part of CSU to revise its assessment instruments to be consistent with the curriculum advocated as necessary for college level preparation. According to Dr. Ochoa, Chairperson of the Mexican American Advisory Committee to the Superintendent of San Diego Unified School District, "...*The California Framework of English Language Arts discourages high school English teachers from their traditional emphasis on the five-paragraph essay, strongly recommending that students have significant opportunities to develop their critical capacities and find their voices in other, more "literary" domains of discourse. Similarly, because the research strongly indicates that out-of-context drilling actually diminishes student's fluency and precision, the Framework suggest alternatives to skill-and-drill activities in grammar mechanics.*"¹⁰ Despite this direction of the framework, the converse content, form, and style determine success on the EPT.

While data regarding the outcome of assessment and placement is presented throughout the supporting documentation for the proposal, CSU has not considered the appropriateness, fairness, or validity of their assessment and placement processes. Generally, one would expect CSU and the public to demand a standard on assessment validation which could withstand the high level of scrutiny related to the appropriateness of the instruments as predictors of readiness and success.

The proposal accentuates the need to examine the merit of using norm-referenced standardized tests for student populations which are not homogeneous in experience, resources, language, learning styles, and socialization. Because norm-referenced tests require the existence of a

⁸Precollegiate Instruction in the CSU, p. 4

⁹Precollegiate Instruction in the CSU, p. 4

¹⁰Alberto Ochoa, Ed.D. Proposed CSU Policy on Remediation, (September 20, 1995) p.5

below average group, actual mastery of a skill is not measured. Rather, the student's performance is identified as either above or below the average. Unfortunately, a common, but erroneous inference of such results is that the students who score below average are intellectually inferior and therefore not able to perform certain levels of academic work.

Another consideration of fair testing is the issue of cultural and gender bias. Accurate determinations that subjectivity and bias are not only eliminated from the testing process, but also from the establishment of the scoring norm are essential to fair and valid testing. If the cut-off and placement scores have been established based on norm-referenced data derived from culturally and gender biased tests, students who have accomplished the skills could be determined to not have meet the proposed entry requirements.

The ELM and the EPT were designed and have been used as placement tests. To use the same test to determine eligibility or qualification for admission violates a fundamental principle of sound research practice. Instruments should be used for the sole and exclusive purpose for which they were developed. To do otherwise is to jeopardize the validity of the test and call into question any resulting decisions based upon its outcome.

Intersegmental Coordination

Coordinating Mechanisms

Because the CSU proposal to eliminate remedial education for entering undergraduate students has far-reaching implications for the California Community Colleges (CCC) and the K-12 systems, existing mechanisms designed for the necessary collaboration and coordination of the various segments in the State's public educational system should have been used by CSU before proceeding. Aside from the various inter-departmental and inter-office communications between the segments, four distinct mechanisms exist for intersegmental coordination: The Intersegmental Committee of the Academic Senates, The Intersegmental Coordinating Council, The Education Roundtable, and The Joint CSU/CCC Board Meetings.

Because CSU chose none of these mechanisms to engage discussion of the issues surrounding the proposal and impact of the proposal on the other segments, CSU appears to have violated a fundamental principle of intersegmental cooperation "*No single segment of education can work in isolation of the other, no single problem can be solved by passing on either the blame or the burden to the other. Finally, whether students are enrolled in high school, adult school, Community Colleges, the State University or the University of California (UC), they are all OUR students and therefore resources, programs, curricula, expectations and support systems should be clearly and jointly articulated in equal partnership.*"¹¹

¹¹California Community Colleges Office of Curriculum and Instructional Resources, Rita Cepeda, Ph.D. Community College Issues That Must Be Addressed in the Intersegmental Basic Skills Discussion. (October 27, 1995) p.3

Curriculum and Assessment Scores

The existing curriculum used in the CSU remedial education is not well articulated with the CCC curriculum. If the CCC curriculum is going to be used as a basis for transfer, greater coordination between the two segments on the content of the curriculum, style and form of the assessment must take place.

Resources

California State University Resources

Currently, California State University officials calculate that approximately 1 percent of their faculty resources are dedicated to precollegiate instruction and support. Citing Fall 1990 data, CSU estimates that 4.8 percent of the student body was placed in precollegiate instruction in both English and mathematics. These courses were taught by 168 full-time equivalent faculty out of a systemwide faculty which numbered 15,099. CSU identified the total cost of remedial and developmental instruction in 1993-94 as \$9.3 million, which they further calculated to equal .6 percent of CSU's General Fund expenditures. This data appears to exclude concomitant student support services.

California Community Colleges Resources

The community colleges offer remedial and developmental programs in both credit and noncredit modalities. In 1993-94, the cost of those offerings was 293.5 million dollars.¹² This figure represents 11 percent of the California Community Colleges General Fund. In Fall 1993, 10,941 sections of basic skills courses were offered, compared to 11,608 courses in Fall 1992.¹³ In Fall 1992, Basic Skills and ESL enrollment comprised approximately 13% of the colleges' instructional activity.¹⁴ It should be noted that the data from the Chancellor's Office is an aggregate figure. It does not delineate the number of students involved or the number of faculty teaching the courses. Additionally, in the community colleges, basic skills is not limited to precollegiate basic skills. Instead it refers to ten categories of course work including Adult Basic Education (Grade 1-8), High School (Grade 9-12), Pre-Collegiate Basic skills, Older Adult Education, Parental Education, Short-term Vocational Education, Disabled Student Education, Health Education and Safety, and Apprenticeship.

The Community College League of California identifies fiscal support as a major element which must be in place prior to the expansion of remedial instruction at community colleges.¹⁵ The League delineated four areas for funding: a) implementation of instruction, b) coordination,

¹²California Community Colleges, Research and Analysis, (March 1995)

¹³Research and Analysis.

¹⁴Research and Analysis.

¹⁵Community College League of California, The Effects of Elimination of CSU Remedial Classes Upon Community Colleges: A Draft Policy Paper, (September 1995) p.2

c) instructional equipment and software, and d) facilities.

Additionally, student support and services designed to increase the propensity of student success should be considered. Because the students in need of basic skills do not exist in a vacuum of the collegiate experience, college-wide activities, services, and programs would also be impacted. The diversion of tens of thousands of students would affect staffing and material needs for various units of the college. These considerations provoke the questions regarding the funding of whether the state funding will follow the redirected students to the community colleges. Further, reconsideration could be given toward a more equitable and realistic funding level for the student in the community colleges as compared to the student in the university.

Scope and Implications

The Master Plan for Higher Education

The Master Plan for Higher Education was passed with the goal that every Californian with the ability to benefit from a college education would have access to California's public institutions of higher education. The University of California (UC) was charged with serving the population that academically performs in the upper one-eighth ranking of the high school graduating population. The CSU was charged with serving the population that academically performs in the upper one-third of the high school graduating population. The CCC were charged with serving any Californian with the ability to benefit from and the desire to attain access to a college education.

A reaffirmation to open access espoused in the Master Plan was presented in Education Code, Section 66201 "Legislative intent: opportunity to enroll and to continue" reads:

It is the intent of the Legislature that each resident of California who has the capacity and motivation to benefit from higher education should have the opportunity to enroll in an institution of higher education. Once enrolled, each individual should have the opportunity to continue as long and as far as his or her capacity and motivation, as indicated by academic performance and commitment to educational advancement, will lead him or her to meet academic standards and institutional requirements.

The Legislature hereby reaffirms the commitment of the State of California to provide an appropriate place in California public higher education for every student who is willing and able to benefit from attendance.

A clear and reaffirmed commitment to the values of inclusiveness, opportunity, and access is evident. In the context of the intent of the State and the charge of the Master Plan, the CSU proposal bears far greater significance than merely identifying academic standards and ideals upon which to base admission to the university. In effect, it serves as a major public policy change inconsistent with the values of the Master Plan.

If the proposal becomes policy, the change in the Master Plan would then occur by default, without the benefit of public discussion and conscious and deliberate action by the

representatives of people of the State. A public policy question should be raised regarding the authority of the CSU Board which serves at the pleasure and the agenda of the Governor, to change policy enacted on the behalf of the people. **The established checks and balances by which education remains outside of the Executive Branch, accountable to the people, but governed by Gubernatorial appointees are eluded if the Board exceeds their authority.**

The impact on the Master Plan is not limited to CSU. The implementation of the proposal could have damaging effects on the CCC's ability to carry out its mission. The tripartite mission of the CCC includes the provision of General Education/Transfer, Vocational/Occupational Education (Economic Development), and Basic Skills. In light of the potential demand of redirected students on an already impacted CCC's, affirmative steps would have to be taken in an attempt to maintain the curricular balance mandated by the original mission. Because the CCC's are the predominant providers of Vocational/Occupational Education and because the CCC's hold a primary responsibility for Economic Development as prescribed in recent legislation (AB3512), a redirection of resources to a particular aspect of the three-part mission could ultimately impact the overall economic health of the state.

The Master Plan charge regarding the level of general education offered at each segment could also be impacted. The CSU is charged with offering baccalaureate (upper and lower division) and graduate level study. The CCC is charged with offering lower division education. Because the CSU data suggests more than one-half of its students are in need of remedial education and because CSU proposes to make demonstration of readiness to undertake college level instruction in English and mathematics a condition of admission, arguments for moving all of lower division and the concurrent resources to the CCC could be revisited in the context of this discussion.

Some CSU campuses report that as high as 80 to 90 percent of their entering freshmen are placed in at least one precollegiate course. Consequently, the implementation of the proposal could have an overwhelming impact on the enrollment of individual campuses. The redirection of those students to the community colleges would then leave a tremendous void in the student demand for lower division at the CSU; that demand would transfer to an already impacted CCC. To that end, more conscious deliberation in lieu of mere consequence should be employed in order to pursue such a drastic change in public policy.

All of the discussion surrounding the impact on the Master Plan should raises this fundamental question; **Does the CSU Board have the authority to act to change public policy outside of the Legislature?**

Diversity / Demographic Considerations

CSU Committee on Education states "*The need for developmental and remedial education is one that transcends cultural and ethnic categories*"¹⁶ While the data presented easily substantiates

¹⁶Precollegiate Instruction in the CSU, p. 3

this, the disproportionate impact the proposal would have on students in groups that have been historically underrepresented in higher education is worthy of further consideration. In 1993, of the students who took the assessment test, the failure rates were:¹⁷

English Proficiency Test Failure Rate	
Asian-American	82%
African-Americans	79%
Mexican-Americans	78%
Whites	41%

Entry Level Mathematics Failure Rate	
African-Americans	90%
Mexican-Americans	81%
Asian-Americans	59%
Whites	68%

While a cursory review of the data reveals that no particular ethnic/cultural group of students is performing well, the disproportionate failure rate of students of color as compared to students who classify themselves as white is immediately obvious. Further, CSU faculty and coordinators of various programs aimed at the success of historically underrepresented students in higher education report that an overwhelming majority of their students are enrolled in or have had to enroll in either one or both remedial education courses. Ending remedial education at the CSU would effectively end these programs. Therefore, implicitly this proposal would be consistent with the explicit policy of the UC Regents to eliminate "affirmative action" programs.

The exclusionary and punitive nature of the proposal has been noted in virtually every written and testimonial presentation originating outside of the CSU on the issue. The concern has been raised by representatives of the:

- a. Asian and Pacific Americans in Higher Education (APAHE),
- b. California Faculty Association - Community College Association
- c. California Federation of Teachers
- d. Faculty Association of California Community Colleges

¹⁷Carl Irving "A Line in the Sand," Crosstalk, Vol.3 No.3 October 1995 p.20

- e. Chancellor's Office of California Community Colleges
- f. American Federation of Teachers University Council
- g. National Education Association
- h. American Association of University Professors
- I. Community College League of California
- j. California State Student Association
- k. California Higher Education Policy Center
- l. The Academic Senate for California Community Colleges
- m. Mexican American Advisory Committee San Diego Unified School District

In effect, precisely at the time when California will no longer have a majority racial/ethnic group, the CSU proposal would have the effect of excluding a preponderance of the students of color from the University. This fact begs the question, **If it was appropriate and sound policy to offer remediation at the necessary level when the students were more white and middle class, why then is it not as appropriate and sound to do the same when the students are more diverse in ethnic-cultural backgrounds and socio-economic status?**

An equally compelling consideration is the academic and intellectual enrichment acquired by a university or college from a diverse campus population. The availability of diverse perspectives furthers the pursuit of intellectual ideals, mitigates against the stagnation of thought, and provides a domain of critical discourse necessary for the maintenance of the academic integrity of the institution. Further, the exposure of students to perspectives other than that of the dominant population furthers their ability to develop mechanisms for participating in a diverse democratic society. The emerging information/technology based era, presupposes that individuals must be educated to participate in a global society which currently has a majority population of people of color. To that end, an institution of higher learning in this nation or any other, that fails to recognize and act upon this principle, inherently compromises the integrity of the institution and its standards of academic excellence.

Absent any strategies to ensure the maintenance of a diverse student population, the effects of the CSU proposal could have the paradoxical effect of lowering, not raising, the standards of the University.

Access

Another consideration is the proposal's impact on access. The CCC will be faced with serving students who are in the top one-third of their graduating class, but who have been re-directed to the CCC by virtue of the CSU proposed policy. The number of students who would be redirected varies from 9,000 to 18,000 depending upon the various sources citing the data. Because the learning needs of the re-directed students and the "traditional community college student" may be very different, the risk of displacement and the denial of access rises.

Once a student enrolls in the CCC he or she becomes a community college student regardless of their eligibility for enrollment in other private or public institutions. The commitment to serve students who might be classified as "CSU redirects" is equal to the commitment to serve any and all Californians who have the ability to benefit from a college education. Consequential "displacement" of the traditional community college student could occur; judicious consideration would need to be given to maintaining access for those displaced students. The existence of under-funded programs, the absence of additional funding, and the increased demand may lead to a system of priority access. *"Students without degree/transfer/certificate goals would presumably be accorded a lower priority for accessing that instruction, thereby delaying their progress and devaluing them and their aspirations."*¹⁸

According to Rita Cepeda, Vice Chancellor of Curriculum and Instructional Resources for the CCC, *"Paradoxically, if a greater proportion of community colleges resources are devoted to remedial instruction for the university bound (transfer) student, access to transfer and career education courses, and to matriculation and transfer services, may be severely restricted."*¹⁹ This point should be critically considered and juxtaposed to the CSU assertion that the intent would be to offer access to just as many students under this plan as would be admitted under current conditions. Further, the imposition of a five-year time line would affect students currently in the seventh grade who will not have had access to any strategic processes implemented to reduce the need for remedial education.

Teacher Preparation

Ralph Pesquiera, CSU Trustee states *"CSU has said 'Enough is enough.' By 2001 you are not going to come to CSU unless you are prepared... Teachers are afraid of principals, superintendents of boards of education, parents of their kids, and the kids aren't afraid of anything. I am not trying to hurt anybody here. If you see the basic building blocks in the third grade, we're not going to lose them. A deep, deep cancer starts back there in Kindergarten,"*²⁰ This interesting quote carries a tone of disdain for the K-12 system and its students. Absent from the discussion however, is acknowledgment that CSU is the predominant provider of teacher education for those teaching of the "cancerous" system. In all of the documents forwarded by CSU concerning the proposed policy, no single recommendation is advanced which would lead to a review of the program effectiveness of the teacher preparation programs at CSU.

Conclusions and Recommendations

¹⁸Community College Issues That Must Be Addressed in the Intersegmental Basic Skills Discussion, p.6

¹⁹Community College Issues That Must Be Addressed in the Intersegmental Basic Skills Discussion, p.5

²⁰"A Line in the Sand," Crosstalk p. 1

Even though definite action is scheduled for January 1996, a review of the information suggests a premature endorsement and pursuit of the proposed policy. Primary questions remain unanswered in regard to: a) the scope and authority of the Board to implement the proposed policy, b) the validity of current CSU assessment and placement practices, c) the absence of consideration of program review for teacher preparation, and d) the absence of coordination and collaboration with the other segments of public education.

To that end, the following recommendations are offered:

1. The California Framework for Mathematics and English/Language Arts should be collaboratively reviewed and modified as determined appropriate by the K-12 and CSU faculty. The form, style, and content which determine success on the EPT and the ELM should be consistent with the same advocated in the framework.
2. CSU should review existing assessment practices for validity, cultural and gender bias, and appropriateness. When and if biases are found, the CSU should take affirmative steps to ameliorate the bias and the effect of the bias. Typically, such steps would include strategies which outreach, recruit, retain, and graduate students adversely affected by the bias. This recommendation should be taken before further consideration is given to implementing the proposed policy.
3. Because the CSU assessment and placement practices will directly affect the curriculum of the CCC, CSU faculty should collaborate with the CCC faculty on the determination of tests cut-off scores and curriculum implications for the CCC preparing the students to meet the CSU determined levels of preparation.
4. CSU should use the existing collaborative and coordinating processes available to the various segments of public education to engage in legitimate and deliberate debate on the proposed policy, review the impending implications, and develop strategies for the appropriate disposition of the issue.
5. Interested parties should seek legislative analysis of the Master Plan or use other appropriate legal resource and recourse to determine if the CSU Board is acting within the scope of its authority. If it is determined to exceed the scope of the Board authority, the portion of the policy which requires preparation for college level English and Mathematics as a condition of admission should be abandoned. Instead, a greater and more honorable focus could be on the elimination of the need for remedial education at the CSU.
6. CSU should give consideration to the disproportionate impact the proposed policy would have on students of color, individual campuses, and programs designed to facilitate the success of targeted students. Further strategies should be developed to ensure a maintenance of the commitment to serve the diverse population of California.

7. **Because the CSU proposed policy could result in a preponderance of lower division instruction being offered by the CCC, discussions should be engaged and strategies should be developed to ensure that the resources for the instruction, administration, facilities and services to fulfill the precollegiate instruction and lower division need are redirected to the CCC along with the students.**
8. **CSU should review their teacher preparation programs for effectiveness in preparing future teachers to achieve the availability of fully prepared students and “..develop an action agenda which places teacher education at the center of CSU efforts to improve the skills and competencies for entering students.”²¹**
9. **Implementation of the proposed policy would have an effect on students currently in the seventh grade. Instead, the time line should be reconsidered in order to effect students entering the first grade at the time of the implementation of the specific strategies designed to reduce the need for precollegiate instruction.**
10. **Consideration should be given to the possibility of a “co-enrolled” and guaranteed transfer status of the students redirected to the CCC. Deliberation should reconsider the 40/60 upper division/lower division ratio, a priority system for CSU eligible verses CCC transfer students will need exploration.**
11. **Care should be taken to avoid basing such a fundamental public policy issue on anecdotal evidence and personal or political agendas. Prior to the implementation of the proposed policy, CSU should pursue research to determine the actual impact of remedial education on time-to-degree and student success.**

²¹Joni Finney, “Are Cal State Trustees Rushing to Judgement?,” Crosstalk, Vol.3 No.3 (October, 1995) p.3