

# **California State University Council of Math Chairs**

***Response to ASA-2017-14: Consultation on Proposed Changes in  
Academic Preparation Requirements***

June 16, 2017

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May 16, 2017

**CODED MEMORANDUM**

**ASA-2017-14**

TO: CSU Presidents

FROM: Loren J. Blanchard, Ph.D.   
Executive Vice Chancellor, Academic and Student Affairs

**Comments Requested By  
Friday, June 16, 2017**

SUBJECT: Consultation on Proposed Changes in Academic Preparation Requirements

The Chancellor's Office is seeking your input on the attached draft executive order, which proposes to amend current California State University (CSU) policy regarding competency in English and mathematics, developmental education, assessment and placement and the Early Start Program. In addition, new overall assessment standards and objectives for the CSU regarding academic preparation will be established. Further guidance on a set of practices to be followed by each CSU campus will be provided after the issuance of the final executive order.

Please review the attached draft executive order and send your comments to Mr. Eric Forbes at [eforbes@calstate.edu](mailto:eforbes@calstate.edu) by June 16, 2017 in order to give us sufficient time to consider feedback, modify the text or the approach that will best serve our students, and permit us to prepare for a final release of the executive order.

**Comment 1: The time frame of May 16 to June 16 does not allow for a proper exercise of shared governance due to the faculty being off-contract. We propose the date of October 16, 2017 for submission of the comments.**

Attachment

- c: Provosts and Vice Presidents for Academic Affairs
- Vice Presidents of Student Affairs
- Dr. Christine Miller, Chair, CSU Academic Senate

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Bakersfield  
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Fullerton  
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**THE CALIFORNIA STATE UNIVERSITY**  
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**401 Golden Shore**  
**Long Beach, California 90802-4210**  
**(562) 951-4712**

**Executive Order:** XXXXXXXXXXXX

**Effective Date:** XXXXXXXXXXXX

**Supersedes:** Executive Order 1048 Effective June 2010  
In part Executive Order 665 Effective February 1997 (IA; IB; IIA; IIB)

**Title:** Competence in English and Mathematics/Quantitative Reasoning

This Executive Order is issued pursuant to Section 40402.1 of Title 5 of the *California Code of Regulations*, and Section II (a) of the Standing Orders of the Board of Trustees of the California State University and Board of Trustees Resolutions regarding academic preparation adopted in January 1996 and January 2008. This Executive Order applies to all undergraduates who enter the California State University (CSU) beginning with summer 2018 and subsequent academic terms.

COMMENT 2: The implementation date (summer 2018) is too ambitious for such major changes and will present significant problems both logistically and in terms of quality programming. For example, summer and fall assignment plans for faculty are already in place. New curriculum development and processing requires time to produce a high quality and properly vetted product that will improve student success and progression to graduation. We recommend the EO apply to all undergraduates who enter the California State University (CSU) beginning with summer 2019 and subsequent academic terms. We also recommend that the EO strongly encourage all campuses to have pilots in place for Fall 2018.

**I. Purpose**

This executive order amends current CSU policy regarding competency in English and mathematics, developmental education, college-level skills assessment, student placement in courses appropriate to skill level and the Early Start Program. In addition, new overall CSU assessment standards and objectives regarding academic preparation are established. Further guidance on a set of practices to be followed by each CSU campus shall be provided by the Office of the Chancellor in a subsequent memorandum.

COMMENT 3: The draft EO does not address or introduce “new” assessment standards. We see new practices, but no mention of objective standards. We recommend explicitly referring to the math foundational proficiency standards as described in the Quantitative Reasoning Task Force Final Report of September 1, 2016. This recommendation includes that all students will be evaluated consistently across the CSU system relative to the required achievement of foundational proficiency to assure success in quantitative college level courses . In the Fall

2017, the Math Council will discuss multiple measures and common placement standards (possibly including ALEKS and other alternatives to the ELM) with an eye toward improving assessment accuracy and reliability.

## **II. Delegation of Authority**

In accordance with policy of the California State University, the campus president has responsibility for implementing executive orders where applicable and maintaining the campus repository and index for all executive orders.

## **III. Guiding Principles**

The CSU values every student's right to access, achievement, equity and opportunity. Increasing college readiness for CSU students directly correlates with reducing time to degree. Strengthening academic preparation in both mathematics/quantitative reasoning and English also aligns with the principles of the Graduation Initiative 2025, particularly the goal to eliminate all equity gaps.

Academic quality will be enhanced by requiring that admitted students have rigorous preparatory experiences in English and quantitative reasoning. Underprepared first year students will engage in academically challenging Early Start Program experiences receiving needed additional support while completing credit-bearing baccalaureate mathematics or English courses.

Campus faculty and academic leadership shall collaborate in the development of courses, curricular modifications and innovative instructional approaches, for which the Office of the Chancellor shall provide resources and technical assistance.

COMMENT 4: A principle articulated above requires that Early Start contain college credit math and English coursework. Given the broad spectrum of deficiencies experienced to date, this is not a reasonable expectation for all students admitted to the CSU. Requiring severely underprepared students to engage in credit-bearing baccalaureate mathematics is a recipe for failure for fragile students who might already feel they don't belong in college. Early Start experiences should provide a maximum opportunity for success, not set students up for failure. We recommend the following alternative language:

“Academic quality will be enhanced by requiring that admitted students have rigorous preparatory experiences in English and quantitative reasoning. Underprepared first year students will engage in academically challenging Early Start Program experiences receiving needed additional support in preparation for credit-bearing baccalaureate mathematics or English courses.”

#### IV. Assessment and Determination of College Readiness

The following requirements allow students the opportunity to earn baccalaureate credit in mathematics and English during their first academic term enrolled (summer, fall, winter, or spring) without compromising academic rigor:

COMMENT 5: Reword the first paragraph to allow for flexibility:

“The following requirements allow students the opportunity to earn baccalaureate credit in courses that intentionally develop quantitative reasoning and English skills, during their first academic term enrolled (fall, winter, or spring) without compromising academic rigor.”

- A. To guide course placement, new students shall be assessed using multiple measures, including academic subjects completed in high school, grades in high school courses, high school grade point average, grades in collegiate courses, ACT scores, SAT scores, Smarter Balanced Assessment scores and/or Early Start Program outcomes.

COMMENT 6: Content experts must be the ones who perform this work. The work must include validation mechanisms of high quality. Selection and oversight of these experts should involve the ASCSU and the Math Council for mathematics and the English Council for English. This item should explicitly mention foundational proficiency as defined in the QRTF Final Report. We suggest adding the following sentence at the end of the existing paragraph:

“With respect to quantitative reasoning, these multiple measure assessments should be strongly grounded in data and designed to determine the degree to which students have achieved proficiency in Foundational Quantitative Reasoning<sup>[1]</sup> as defined in the Quantitative Reasoning Task Force Final Report of September 1, 2016. Assessment outcomes should be transferable across the CSU system.”

- B. Students whose assessment measures determine proficiency and/or readiness shall be placed in college-level, credit-bearing baccalaureate courses.

COMMENT 7: Students who are proficient often self-select many of their courses. For such proficient students, these courses are nearly always college credit-bearing. The draft EO language implies that campuses will be required to place students rather than continuing the existing self-selection practices. Was this clause supposed to target both English and math or only math specifically? We recommend using the QRTF Final Report language and rewording to come into consistency with VC Blanchard’s letter to ASCSU Chair, Christine Miller on March 7, 2017: “Campuses will be required to schedule sufficient numbers of sections for students to be able to complete Area B4 courses within the first year of attendance.”

“Students whose assessment measures determine proficiency in Foundational Quantitative Reasoning<sup>[1]</sup> shall be eligible for at least one college-level, credit-bearing General Education B4 course at each campus.”

- C. Students whose skills assessments reveal that additional academic preparation is needed shall be placed into appropriate college-level, baccalaureate credit-bearing courses that provide skills-development support through pedagogical approaches, curricular modifications and innovative instructional approaches. These may include co-requisite, supplemental instruction or “stretch” courses that fulfill requirements by expanding the number of instructional contact hours across multiple courses or contiguous terms.

COMMENT 8: For the weakest students, local campuses and common sense may indicate that there are no “appropriate” college level math courses. College credit certainly should not be granted for pre-college coursework. This clause should be written to allow for placement into college credit-bearing courses that contain quantitative reasoning skill development. We suggest the following alternative language, which coupled with the first “suggestion” above under item IV would allow for appropriate flexibility and innovation:

“Students whose skills assessments indicate near-proficiency in Foundational Quantitative Reasoning shall be placed in appropriate baccalaureate credit-bearing courses that provide skills-development support through pedagogical approaches, curricular modifications and innovative instructional approaches. These may include co-requisite models, supplemental instruction or “stretch” courses that fulfill requirements by expanding the number of instructional contact hours across multiple courses or contiguous terms. Contact hours directly associated with pre-college content should not generate additional units toward degree. For example, a 3-unit co-requisite course with 1 unit of pre-college content should only generate 2 units of credit towards the college degree. Students whose skills assessments indicate a substantial shortfall in proficiency in Foundational Quantitative Reasoning shall be placed into an appropriate course with pre-college content, leading to an opportunity to be placed into an appropriate college-level mathematics course.”

- D. Campuses shall establish committees to address student requests related to course placement resulting from extraordinary considerations and identify alternative equivalent experiences to assess readiness.

COMMENT 9: The requirement to “establish committees” (note use of “shall”) has workload and therefore budget implications. The final decisions about students’ placement into appropriate courses should be decided by designated faculty from the content areas (i.e. from English and Mathematics departments).

- E. The Admission Advisory Council (AAC) shall be responsible for the oversight and review of systemwide policies regarding college readiness and assessment, course placement and the Early Start Program.
- F. The English Placement Test (EPT) and the Entry Level Mathematics (ELM) Test are no longer required, and the associated committees shall be disbanded.

COMMENT 10 on E and F: The Math Council is particularly disturbed by what is proposed in IV-E. The Admission Advisory Council is not predominantly content experts in English and mathematics (like the EPT and ELM committees) and therefore is not appropriate for the oversight described. The ASA consists of 4 faculty members out of 20 total and even when supplemented with a couple content experts, as has been suggested, still will not contain the appropriate mix of expertise. The proposed oversight by the AAC is contrary to HEERA and established practice in the CSU. If curriculum is to remain the purview of faculty, as it should, separate committees for each content area consisting primarily of faculty with relevant content expertise, similar to the EPT and ELM committees, should be established to be “responsible for the oversight and review of systemwide policies regarding college readiness and assessment, course placement and the Early Start Program.” In fact, Recommendation IV of the Quantitative Reasoning Task Force report calls for a Center that would ensure appropriate oversight for quantitative reasoning. These content-specific groups could provide the necessary expertise to ensure proper articulation and transferability between schools in the California higher education system. Similar to what is found in EO 1048 and EO 665, specific language ensuring consultation with the English and Math Councils should be added to the draft EO. Instead of disbanding the EPT and ELM committees, they could and probably should be modified and re-tasked to accomplish this objective. See the section on General Comments under EO 665 discussion for more information about this issue.

## V. Early Start Program

- A. The summer Early Start Program shall be offered to entering first-time students in need of additional academic preparation in English or mathematics/quantitative reasoning.

COMMENT 11: Currently the early start program is compulsory. The language of “shall be offered” implies a degree of discretion as to whether students take it or not. Is the intent to convey that Early Start experiences “shall be offered *by each campus*”?

- B. Students whose skills assessments reveal that additional academic preparation is needed shall be placed into appropriate college-level, baccalaureate credit-bearing courses that provide skills-development support through pedagogical approaches, curricular modifications and innovative instructional approaches, similar or equivalent to those offered during fall, winter or spring terms. These may include co-requisite, supplemental instruction or “stretch” courses that fulfill requirements by expanding the number of instructional contact hours across multiple courses or contiguous terms.

COMMENT 12: By inspection one realizes this language is simply a cut and paste of the language in IV – C that applies to regular academic terms. The opportunities available during the summer when Early Start is held are not necessarily comparable to the regular semesters or quarters. Moreover, the academic environment is

fundamentally different from that of the regular academic year. Multiple courses are rarely taken during the summer due to the compressed time frames involved; all students are new and thus transitioning into college life and many students are still demonstrating their readiness for college level work. Consequently, what is needed in Early Start is a specialized “orientation” style approach designed to develop foundational proficiency. Unfortunately, the clause seems to indicate that the early start experiences should be identical to the academic year experiences and should thus carry college credit. This would violate the fundamental principle that pre-college coursework should not carry college credit toward degree. We recommend the following alternative language:

“Students whose skills assessments reveal that additional academic preparation is needed to achieve proficiency in Foundational Quantitative Reasoning shall be placed into appropriate Early Start courses that provide skills-development support through pedagogical approaches, curricular modifications and innovative instructional approaches. Such offerings must provide students with an opportunity for improved placement prior to their first academic term enrolled.”

C. Online courses shall satisfy Early Start Program requirements in accordance with university policy.

COMMENT 13: What is the intention of this clause regarding online Early Start offerings? Why is the comment needed in this EO?

D. Any student who has earned baccalaureate academic credit, satisfied a general education requirement and/or demonstrated proficiency through a CSU Early Start Program course shall have that status recognized by all other CSU campuses without further review.

COMMENT 14: This clause requires that when a campus certifies college readiness or grants college credit, or grants satisfaction of GE requirement through an Early Start experience, then all campuses will honor the units, certification of proficiency and GE credit. This will be complicated by the spectrum of innovations that seem to be anticipated by this EO.

E. Summer academic programs, such as “Summer Bridge,” may be completed as an alternative to satisfying the Early Start Program requirement.

F. Early Start Program fees will be determined by the Office of the Chancellor. Financial aid shall be available for qualifying students who are required to participate in the Early Start Program.

COMMENT 15: This limited discussion on financial aid apparently replaces a detailed accounting in EO 1048. We recommend that the language from EO 1048, which is more comprehensive, be adopted here.



## GENERAL COMMENTS AND OTHER ISSUES:

This draft EO is being described as a high level policy statement that will leave many of the implementation details out. As such, if the CSU is truly committed to promoting a 4<sup>th</sup> year of required mathematics/quantitative reasoning, as presented to the Board of Trustees, then that policy intent should appear in the new Executive Order. It could also include the intent that implementation must minimize negative impacts to access and equity, as is the consensus in the CSU.

## COMMENTS RELATED TO EO 1048

While a high level policy statement is appealing, the EO would supersede Executive Order 1048 without providing clarity on several important points:

- EO 1048 calls for oversight of Early Start by the Early Start Implementation Team. The draft EO does not specify a governing body for Early Start, rather it seems to place oversight of all aspects of academic readiness under the Admissions Advisory Council. As we have noted, the issues dealt with in this draft EO are curricular and therefore should be governed and lead by faculty. AAC would not be an appropriate overseeing body for Early Start and would be contrary to long standing CSU practice. In addition, EO 1048 calls for the Early Start Implementation Team to “work closely with the faculty of the English and Mathematics Councils.” There is no such corresponding statement in this draft EO. Similar statements regarding appropriate consultation as found in EO 1048 would strengthen the new draft EO.
- EO 1048 defines proficiency precisely in terms of ELM and EPT scores. This draft EO only states that proficiency will be determined by some future mechanism, vaguely employing “multiple measures” in an unspecified way. A clear explanation of how these measures will be established and overseen and who will be doing that work is appropriate. The draft EO as it stands now does not set out policy that this should be accomplished by content experts in collaboration with stakeholders. Language spelling that out would also strengthen the draft EO. EO 1048 clearly designates (item B-3) the Math Council as the body responsible for setting proficiency standards in mathematics. Some version of this designation should be echoed in the new draft EO as well.
- Item B-4 in EO 1048 calls for a review in consultation with the English and Math Councils every two years to review proficiency assessment. The new draft EO might benefit from a similar review requirement.
- EO 1048 contains the requirement that campuses develop Early Start Programs and submit them for review and approval by the EVC/CAO. Due to the new proposed requirements, campuses will need to review and substantially revise their existing programs. The new EO does not provide for an approval process. Providing a process description and vetting it would strengthen the draft EO.
- Under Item D in EO 1048, financial aid details are provided. Those details are currently lacking from the new draft EO and perhaps should be provided.
- Item E in EO 1048 provides a clear implementation timeline. Providing a timeline, or a process to develop such a timeline for implementation and vetting it would strengthen the draft EO.

## COMMENTS RELATED TO EO 665 Items IA/B and IIA/B

EO 665, in items IA and IIA clearly provide that the ELM and EPT Advisory Committees have the *primary* responsibility for policy development regarding student proficiency. The draft EO calls for the AAC, a body currently without sufficient faculty representation and little appropriate content knowledge to take on that responsibility. As we have pointed out above, this type of oversight is not in the spirit of shared governance and has the net effect of removing curricular decisions from the faculty, where they properly belong. The ELM and EPT Advisory Committees should be renamed, but the tasking as provided in EO 665 could remain the same.

EO 665 B-1 provides clear guidance on assessment and placement for first time freshmen and transfer students. This clear guidance is absent from the draft EO that is replacing these sections of EO 665. Similar guidance policy should also appear in the new EO. For example, EO 665 provides that non-proficient students may not enroll in GE mathematics classes. The new draft EO is silent on that point and therefore this restriction would technically be removed. The EO should provide campuses a similar mechanism for reasonably restricting the enrollment of non-proficient students into courses that require foundational proficiency. Carefully crafted language that maintains this restriction while admitting alternative co-requisite, stretch and other innovative college credit bearing structures currently prohibited by EO 665 is needed. Also, language for transfer students that maintains the transfer policies in EO 665 that are being replaced should be added in to the new draft EO.

### SUMMARY

We find that the draft Executive Order could be strengthened significantly by adopting the recommendations provided in this document. We strongly promote forming a joint workgroup between the ASCSU and the CO that includes Math and English Council representation to accomplish this. The first order of business for this group should be to establish an aggressive timeline for EO development that is sensitive to the objectives of the 2025 Graduation Initiative.

Links to EO 1048 and EO 665 for reference:

EO 665: <https://www.calstate.edu/eo/EO-665.pdf>

EO 1048: <https://www.calstate.edu/eo/EO-1048.html>

<sup>1</sup> See [Quantitative Reasoning Task Force's Final Report](#):

<http://www.calstate.edu/AcadSen/Records/Reports/documents/QRTF.FinalReport.KSSF.pdf>