Date of Hearing: April 20, 2022

#### ASSEMBLY COMMITTEE ON EDUCATION Patrick O'Donnell, Chair AB 2617 (Holden) – As Amended April 7, 2022

# [Note: This bill is double referred to the Assembly Higher Education Committee and was heard by that Committee as it relates to issues under its jurisdiction.]

**SUBJECT**: Pupil instruction: dual enrollment programs: competitive grants: College and Career Access Pathways partnerships: best practices: communication and marketing strategy

**SUMMARY**: Establishes a grant program administered by the California Department of Education (CDE) for the purpose of increasing participation in dual enrollment programs at designated local education agencies (LEAs). Specifically, **this bill**:

- Requires, contingent upon an appropriation by the Legislature in the annual Budget Act or another statute, the CDE, in consultation with the office of the Chancellor of the California Community Colleges (CCCCO), to, beginning on or before July 1, 2023, administer a competitive grant program to do all of the following:
  - a) Enable more local educational agencies (LEAs) to establish either middle college or early college high schools that provide pupils with access to obtain college credits while enrolled in high school.
  - b) Provide incentives for LEAs to establish dual enrollment course opportunities that are consistent with the requirements of California College and Career Access Pathways (CCAP) partnerships.
  - c) Enable LEAs to couple robust pupil advising and success supports with available dual enrollment programs and establish outreach campaigns to encourage pupils to enroll in dual enrollment programs.
- 2) Requires, of the funds appropriated in support of this grant program, the SPI to provide approved applicants with any, or all, of the following, as applicable:
  - a) A one-time grant of up to \$500,000 to support an LEA's costs, over a five-year period, to establish outreach campaigns to encourage pupils to enroll in dual enrollment programs, and to couple robust pupil advising and success supports with available dual enrollment and accelerated college credit opportunities;
  - b) A one-time grant of up to \$250,000 to support the costs to plan for, and start up, a middle college or early college high school that is located on the campus of an LEA, as specified; and
  - c) A one-time grant of up to \$100,000 to establish a CCAP dual enrollment partnership agreement, as specified, and to enable pupils at the participating high school to access dual enrollment opportunities pursuant to the CCAP partnership agreement.

- 3) Authorizes an LEA to request grants from any, or all, of the opportunities specified above.
- 4) Requires the funds appropriated in the annual Budget Act or other statute to be distributed, approximately, in the following manner:
  - a) 60% to be available for the purposes of one-time grants of up to \$500,000 to support a LEA's costs, over a five-year period, to establish outreach campaigns to encourage pupils to enroll in dual enrollment programs, and to couple robust pupil advising and success supports with available dual enrollment and accelerated college credit opportunities;
  - b) 27.5% to be available for the purposes of one-time grants of up to \$250,000 to support the costs to plan for, and start up, a middle college or early college high school that is located on the campus of a LEA, as specified; and
  - c) 12.5% be available for the purposes of one-time grants of up to \$100,000 to establish a CCAP dual enrollment partnership agreement, as specified, and to enable pupils at the participating high school to access dual enrollment opportunities pursuant to the CCAP partnership agreement.
- 5) Requires an LEA seeking a grant to submit an application to the SPI at a time, in a manner, and with any appropriate information, as the SPI may reasonably require.
- 6) Requires the SPI to give priority to available grant funds to support applications from LEAs that display any of the following characteristics:
  - a) 50% or more of the enrolled pupils at the LEA are unduplicated pupils for purposes of the Local Control Funding Formula (LCFF);
  - b) The LEA has a higher than state average dropout rate;
  - c) The LEA has a higher than state average rate of suspension and a higher than state average rate of expulsion;
  - d) The LEA has higher than state average rates of child homelessness, foster youth, or justice-involved youth; or
  - e) The LEA has a lower than state average rate of pupils completing all of the A–G courses required to be eligible for admission to the University of California or the California State University.
- 7) Requires the SPI to begin disbursing funds for approved applicants on or before December 1, 2023, to ensure funds are disbursed in a timely manner.
- 8) States the intent of the Legislature that courses offered to high school pupils in dual enrollment programs are part of structured, well-sequenced pathways and count toward postsecondary certificate or degree requirements, and are counted toward high school graduation requirements in equivalent subject areas.

- 9) States the intent of the Legislature that courses offered to high school pupils pursuant to a CCAP partnership agreement, are part of structured, well-sequenced pathways and consist of transfer-level courses, unless one of the following occurs:
  - a) The pupil elects to participate in a degree or certificate pathway that is not met with transfer-level courses.
  - b) The pupil has failing grades in mathematics, English, or both, in grade 10 or 11, as determined by the partnering school district, county office of education (COE), or charter school. The pupil may be placed into an innovative remediation course during their first year of participating in the CCAP partnership agreement as an intervention taken to ensure the pupil is on track to satisfactorily complete state and any local graduation requirements, as determined by the school district, COE, or charter school, and is prepared for transfer-level coursework at a community college upon graduation.
- 10) Requires, on or before June 30, 2024, and on or before June 30, 2027, the CDE to prepare a summary of how the funds were disbursed and used to further the specified goals, and to submit the summary to the Senate Committee on Education, Assembly Committee on Higher Education, and Assembly Committee on Education. Requires the summary to include all of the following information:
  - a) The number of grants awarded, disaggregated by LEA;
  - b) How the funding was used by local educational agencies to accomplish the specified goals;
  - c) The total number of high school pupils by schoolsite enrolled in dual enrollment programs disaggregated by participation in middle college high school, early college high school, CCAPs, and other dual enrollment programs.
  - d) The total number of community college courses by course category taken by pupils participating in middle college high school, early college high school, CCAPs, and other dual enrollment programs.
  - e) The total number of successful course completions by course category disaggregated by participation in middle college high school, early college high school, CCAPs, and other dual enrollment programs.
  - f) Program outcomes for pupils who were enrolled in dual enrollment programs, disaggregated by grade level, gender, socioeconomic status, and race and ethnicity.
- 11) States the intent of the Legislature that, upon the implementation of the California Cradle-to-Career Data System, future data and outcome reporting on dual enrollment programs to be linked through, and conducted in accordance with, the privacy requirements of the California Cradle-to-Career Data System.
- 12) Defines "local educational agency" to mean a school district, charter school, or COE.

13) Appropriates \$500 million in one-time funds from the General Fund, Proposition 98, to the CDE, in consultation with the office of the CCCCO, to administer this competitive grant program. Requires the appropriated funds to be available for encumbrance until June 30, 2027.

#### **EXISTING LAW:**

- Authorizes a student to undertake courses at a CCC if the governing board of a school district, upon recommendation of the principal of the student's high school and with parental consent, determines a student would benefit from advanced or vocational coursework. The student may attend the CCC during any session or term as a special part-time or full-time student and take one or more courses of instruction offered at the CCC. Provides methods for parents to petition for students to attend community college courses and methods for appeals in case of a denial. Includes criteria for allocating attendance and funding for high school students who attend courses at the community college.
- 2) Stipulates that summer courses may be offered if a student has met specified conditions and if the principal has not recommended summer session attendance to more than 5% of the student's grade population in the previous year. All physical education courses must adhere to the 5% threshold and the following courses are exempt until January 1, 2027:
  - a) Courses which are part of a CCAP and meet specified criteria;
  - b) Courses which are lower division, college-level courses that are either a college-level course that are part of the Intersegmental General Education Transfer Curriculum or applies towards the general education requirements of the CSU; and
  - c) Courses which are a college-level occupational course, as defined. (Education Code (EC) 48800)
- 3) Authorizes, until January 1, 2027, the governing board of a CCC district to enter into a CCAP partnership with the governing board of a school district or the governing body of a charter school for the purpose of offering or expanding dual enrollment opportunities for pupils who may not already be college bound or who are underrepresented in higher education, with the goal of developing seamless pathways from high school to community college for career technical education or preparation for transfer, improving high school graduation rates, or helping high school pupils achieve college and career readiness.
- 4) Requires that the CCAP partnership agreement be approved by the respective governing boards of the CCC district and the school district or governing body of the charter school. Requires the governing boards or body to:
  - a) Consult with and consider the input of the appropriate local workforce development board in order to determine to what extent the career technical education pathways are aligned with regional and statewide employment needs; and,
  - b) Present, take comments from the public on, and approve or disapprove of the CCAP partnership agreement at an open public meeting of the governing board of the district or governing body of the charter school.

- 5) Requires the CCCCO to report to the Department of Finance (DOF) and Legislature annually on the amount of full-time equivalent students (FTES) claimed by each CCC district for high school pupils enrolled in non-credit, non-degree applicable, and degree applicable courses; and provides that, for purposes of receiving state apportionments, CCC districts may only include high school students within the CCC district's report on FTES if the students are enrolled in courses that are open to the general public, as specified. Additionally, requires the governing board of a CCC district to assign a low enrollment priority to special part-time or full-time students in order to ensure that these students do not displace regularly admitted community college students. (EC 76001 and 76002)
- 6) Requires the Chancellor of the CCC, on or before January 1, 2021, to prepare a summary report that includes an evaluation of the CCAP partnerships, an assessment of the growth of special admits system wide and by campus, and recommendations for improving the CCAP partnerships, as specified. Requires the report to be transmitted to the Legislature, the DOF, and the Superintendent of Public Instruction (SPI). Requires the Chancellor of the CCC to annually collect specified data from the CCC and school districts participating in a CCAP partnership. Requires the data to include:
  - a) The total number of high school pupils by school site enrolled in each CCAP partnership, disaggregated by gender and ethnicity;
  - b) The total number of CCC courses taken by CCAP partnership participants disaggregated by category, type, and school site;
  - c) The total number and percentage of courses successfully completed by CCAP partnership participants disaggregated by course category, type, and school site;
  - d) The total number of FTEs generated by the CCAP partnership community college district participants; and,
  - e) The total number of full-time equivalent students served online by the CCAP partnership college district participants. (EC Section 76004)
- 7) Establishes Middle College High Schools (MCHS). Requires each MCHS to be structured as a broad-based, comprehensive instructional program focusing on college preparatory and school-to-work curricula, career education, work experience, community service, and support and motivational activities. Authorizes the specific design of a MCHS to vary depending on the circumstances of the community college or school district. Requires the basic elements of the MCHS to include, but not be limited to, the following:
  - a) A curriculum that focuses on college and career preparation;
  - b) A reduced adult-student ratio;
  - c) Flexible scheduling to allow for work internships, community service experience, and interaction with community college student role models; and
  - d) Opportunities for experiential internships, work apprenticeships, and community service. (EC Section 11300)

8) States that Early College High Schools (ECHS) are small, autonomous schools that blend high school and college into a coherent educational program. In ECHS, pupils begin taking college courses as soon as they demonstrate readiness and the college credit earned may be applied toward completing an associate or bachelor's degree, transferring to a four-year university, or obtaining a skills certificate. (EC Section 11302)

#### FISCAL EFFECT: Unknown

#### **COMMENTS**:

*Need for the bill.* According to the author, "Dual enrollment programs such as the College and Career Access Pathways are key tools to turning the tide on successful college graduation because they give students a chance to see for themselves what their college experience could be, and before they know it, they have a few semesters of college credit under their belt. Of course, it does not end with just providing an opportunity; we need to communicate to students and parents that the opportunity is available and once they take up the opportunity, students need to know they have the academic and non-academic support needed on their journey to college graduation."

**Dual Enrollment.** According to the United States Department of Education's Institute of Education Sciences Transition to College, What Works Clearinghouse Report of February 2017, dual enrollment programs allow high school pupils to take college courses and earn college credits while still attending high school. Historically, dual enrollment targeted higher-achieving students through Advanced Placement exams or attending community college to take advanced courses after the student had exhausted courses offered at their high school campus. However, within the last decade, policymakers and educators have utilized dual enrollment as a strategy to help more students earn college credit and ease the transition to college.

Such programs, also referred to as concurrent enrollment, dual credit, or early college programs, are designed to increase college access and degree attainment, especially for students typically underrepresented in higher education. According to the report, dual enrollment programs support college credit accumulation and degree attainment via at least three mechanisms:

- 1) Allowing high school students to experience college-level courses helps them prepare for the social and academic requirements of college while having the additional supports available to them as high school pupils (this could reduce the need for developmental coursework).
- 2) Students who accumulate college credits early and consistently are more likely to attain a college degree.
- 3) Many dual enrollment programs offer discounted or free tuition, which reduces the overall cost of college and may increase the number of low socioeconomic status students who can attend and complete college.

In August 2019, the National Center for Education Statistics published findings from the *High School Longitudinal Study of 2009*. The data collected represented a cohort national study of the course taking behavior of high school students from 2009 to 2013. The study found that 89% of high schools in the nation offer dual enrollment programs, but only 11% of students participated in dual enrollment programs. Recent research from the UC Davis Wheelhouse in collaboration

with the California Education Lab and Policy Analysis for California Education, found California has not only exceeded the national average of dual enrolment participation, but has increased dual enrollment participation from 11.3% in 2015-2016 to 18.2% in 2018-19.

According to a 2021 policy brief from The Public Policy Institute of California, *Dual Enrollment in California*, more than 112,000 California high school students graduating in the 2019–20 school year participated in dual enrollment—an increase of 56% from 2015–16. The growth is attributed in part to the authorization of CCAPs in 2016 and higher Latino student participation. After high school, students who participated in dual enrollment enroll at two- and four-year colleges at higher rates compared to all high school graduates.

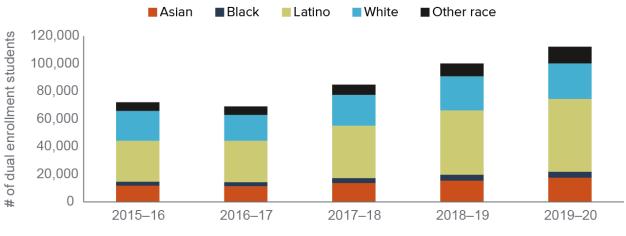


Table 1: Participation in Dual Enrollment at Community Colleges has Been Growing

High school graduating class (estimated)

# Source: PPIC

In California, high school students or their parents can petition their school board for permission to attend college courses on a college campus for dual credit. However, there are three other dual enrollment programs available to high school students including, a MCHS, an ECHS, and the CCAP.

A MCHS is a public high school located on a community college campus and represents a highly effective collaborative effort between local school districts and community colleges to provide an alternative learning environment to select at-promise high school students who are performing below their academic potential. Students enroll in a MCHS for 11<sup>th</sup> and 12<sup>th</sup> grades and graduate with a high school diploma and up to 44 units worth of college credits. Currently there are 14 MCHS operating throughout the state.

Similar to a MCHS, an ECHS allows students to earn college credit while enrolled in high school; however, an ECHS is a partnership between a charter or non-charter public high school and a local community college, the California State University (CSU), or the University of California which enables students to earn a high school diploma and two years of college credit in four years or less. Students enrolled in an ECHS are limited to enrolling in up to 11 college course units per semester. According to the CDE there are 20 ECHS located throughout the state.

*Outcomes for students participating in dual enrollment programs.* According to a 2017 U.S. Department of Education Institute of Education Sciences review of analyses of dual enrollment programs, *What Works Clearinghouse Intervention Report: Dual Enrollment Programs*, dual enrollment programs have positive and significant effects on students' college degree attainment, college access and enrollment, credit accumulation, completing high school, and general academic achievement in high school, with a medium to large extent of evidence.

A 2013 Educational Evaluation and Policy Analysis research article, *The Impact of Dual Enrollment on College Degree Attainment: Do Low-SES Students Benefit?*, used a nationally representative sample of students who began postsecondary education in 2003, and found that students who took dual enrollment courses were 10% more likely to complete a Bachelor's degree than their peers who did not participate in dual enrollment. The benefits were even greater (12%) for students whose parents never attended college.

According to a 2021 Public Policy Institute report, *Dual Enrollment in California: Promoting Equitable Student Access and Success*, there are racial disparities in access to dual enrollment classes in California. Although there is an increasing number of students of all races participating in dual enrollment, the demographics of dual enrollment are not proportional to overall high school enrollments. Latino students account for 55% of high school enrollment in California but only 45% of students in dual enrollment are Latino. Black students are also underrepresented, while white and Asian students are overrepresented. Student academic outcomes are also disparate. Black and Latino students have a grade point average of 2.9, while white and Asian students have a grade point average of 2.9, Black and Latino students are other and Asian peers.

*College and Career Access Pathways (CCAP) partnerships.* In an effort to expand the availability of dual enrollment programs to more students, AB 288 (Holden), Chapter 618, Statutes of 2015, created another category of special admit options, the CCAP. In order to establish a CCAP partnership, the governing board of a CCC district and the governing board of a school district (or governing body of a charter school) enter into a formal agreement. The intent of this new pathway is to serve lower achieving students in an effort to reduce remediation, increase degree completion, decrease time to earn a degree, and stimulate interest in higher education among high school students who may not already be college bound or who are underrepresented in higher education. According to information provided by the author's office, the program was structured to authorize a model more like the Long Beach Promise, which offers dual enrollment as a pathway, rather than a series of disconnected individual courses, and to provide greater flexibility in the delivery of courses at the high school campus.

The CCAP partnership authorization provides two incentives to form partnerships:

- 1) Colleges may receive apportionment for providing courses on a high school campus specifically for high school students is and otherwise closed to the public.
- 2) Students may take up to 15 units per semester. In non-CCAP dual enrollment, the maximum remains 11 units per semester.

In exchange for the greater flexibility, CCAP partners must meet a variety of requirements relative to instructors, job displacement, preserving access for adult students, and allowances and apportionments. While CCC districts may operate a dual enrollment partnership through an

early college high school or middle college high school, they are prohibited from operating as a CCAP partnership unless they comply with the established provisions. Currently, there are 83 CCAP partnerships throughout the state.

**CCAP Legislative Report.** In 2021, the CCCCO released the legislative report required by AB 30 (Holden), Chapter 510, Statutes of 2019. Dual enrollment is growing overall and in terms of student participation; however, the number of community colleges participating in CCAP remains limited. The Chancellor's Office estimates that 37.5% of students participating in dual enrollment as special admits were in CCAP partnerships.

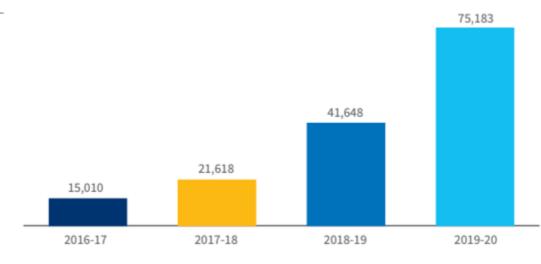


Table 2: CCAP Dual Enrollment

Source: CCAP Annual Reports

Source: CCCCO College and Career Access Pathways Legislative Report

The report includes several recommendations, including eliminating the sunset date for CCAP partnerships, as this bill proposes. The CCCCO believes that eliminating the sunset date will allow CCAP partnerships to continue and mature, as well as remove any worry that new partnerships will have to start from scratch in a few years.

*Governor's Budget proposal.* The Governor's Budget for 2022-23 includes a proposal of \$500 million in one-time Proposition 98 General Funds to be provided over the course of four years for the purpose of strengthening and expanding access and participation in dual enrollment programs that include the use of student advising and support services. Contained within the K-12 omnibus trailer bill language proposed by the Department of Finance (DOF) is language closely aligned to the language provided in AB 2617. The differences between the two pieces of language include:

- In detailing how the grants will be used by LEAs, this bill establishes the grants may also be used to conduct outreach campaigns to encourage enrollment in dual enrollment programs. The DOF trailer does not provide any funding for outreach.
- This bill ensures the SPI will begin dispersing the funds to applicants in a timely manner by December 1, 2023; however, the DOF trailer bill does not have a timeframe to begin the dispersal of funds.

- This bill contains a reporting requirement which requires the CDE by June 30, 2024 and by June 20, 2027 to report on how the funds were dispersed and used by LEAs to increase participation in dual enrollment programs. The DOF trailer bill does not have any reporting language.
- This bill stipulates it is the intent of the Legislature that dual enrollment data be included in the Cradle-to-Career data system and the DOF trailer bill does not contain this language.
- This bill clarifies that the intent of the Legislature with regards to CCAP programs is to encourage students to enroll in courses on designated pathways leading to degree or certificate attainment and that the majority of courses should be transfer-level unless the student has elected to participate in a program that does not contain transfer-level courses or has not met the academic standards to be placed into transfer-level courses. The DOF trailer bill stipulates it is the intent of Legislature that CCAP programs predominately consist of transfer-level courses.

*The Committee may wish to consider* that the DOF trailer bill language related to courses offered to high school students in a CCAP partnership consist predominately of courses that are transferable to a public institution of higher education is a departure from the CCAP enabling statute. Currently, some associate degrees and some CTE courses or programs do not offer transfer-level courses and instead offer college credit courses. CCAP requires remediation courses to be innovative, and created as a collaborative effort between high school and community college faculty to provide intervention in the pupil's junior or senior year to ensure the pupil is prepared for college-level work upon graduation. The remediation course offered by the CCAP partnership is not the same remedial courses offered at a community college for college for college students and is intended for high school students only.

*Arguments in support.* According to the Stanislaus Community Foundation, "Research clearly shows that students not on the college pathway or who are seen as farthest from 'college-ready' are the ones who see the biggest gains when accessing dual enrollment. Dual enrollment can support their educational recovery by reengaging students to recover credits for on-time high school graduation and it can help them perceive college as realistic by letting them access college courses and increase the likelihood that they will enroll after graduation. AB 2617 will enable and incentivize more local education agencies to establish dual enrollment opportunities for students, couple those opportunities with student support services and outreach campaigns, and ensure dual enrollment opportunities for students, couple those opportunities for students are studied for future program improvements."

*Related legislation.* AB 102 (Holden) of the 2021-22 Session authorizes COEs to enter into CCAP partnerships with the governing board of CCC districts, and removes the sunset date for the CCAP partnerships.

AB 103 (Holden) of the 2021-22 Session requires the CDE and the CCCCO, in consultation with experts in the field of CCAP partnerships, to identify best practices for CCAP partnerships and appropriate financial incentives for school districts and community college districts to participate in CCAP partnerships, and to distribute the best practices to school districts and community college districts on or before September 1, 2023. The bill also requires, on or before September 1, 2023, the CDE and the CCCCO, in consultation with experts in the field of CCAP

partnerships and other key stakeholders, to develop a statewide pupil- and parent-centered communication and marketing strategy that includes specified outreach and information, in order to increase the visibility of the CCAP partnerships for all secondary pupils in California. This bill was held in the Assembly Higher Education Committee.

AB 30 (Holden), Chapter 510, Statutes of 2019, streamlines the process for developing CCAPs, in part, by: changing the conditions of how CCAP partnership agreements may be adopted, authorizing high school pupils to complete only one community college application for the duration of their attendance, as specified, and, extending the sunset of the CCAP partnership from January 1, 2022, to January 1, 2027.

SB 586 (Roth), Chapter 529, Statutes of 2019, requires the governing board of a school and CCC district, as part of a career technical education CCAP partnership, to consult with the appropriate local workforce development board to determine the extent to which the pathway is aligned with regional and statewide employment needs.

AB 2019 (Holden) of the 2019-20 Session would have expanded participation in CCAP partnerships to county offices of education. This bill was held in the Senate Appropriations Committee.

AB 1729 (Smith), Chapter 784, Statutes of 2019, exempts additional high school students from counting toward the 5% enrollment cap imposed on summer community college courses and requires students to meet and enroll in courses that meet specified conditions.

AB 1809 (Committee on Budget), Chapter 33, Statutes of 2018, the Higher Education trailer bill, authorizes charter schools to enter into a CCAP with the governing board of a CCC district.

AB 2891 (Holden) of 2017-18 Session would have authorized the governing body of a charter school to enter into a CCAP partnership with the governing board of a CCC district which allows high school students to concurrently enroll in community college courses. This bill was held in the Assembly Appropriations Committee.

AB 2364 (Holden), Chapter 299, Statutes of 2016, requires a community college district to exempt all special part-time students, as specified, from nonresident fees and allows these students to be reported as resident FTES to receive associated state apportionments.

AB 288 (Holden), Chapter 618, Statutes of 2015, authorizes the governing board of a CCC district to enter into a CCAP partnership with the governing board of a school district in its immediate service area, with the goal of developing seamless pathways from high school to CCC in order to offer or expand dual enrollment opportunities for students who may not be college bound or who are underrepresented in higher education; and, outlines the conditions that must be met prior to the adoption of the CCAP agreement. Requires, on or before January 1, 2021, the CCC Chancellor to report to the Legislature, an evaluation of the CCAP partnerships, an assessment of trends in the growth of special admits system-wide and by campus, and, based upon the data collected recommendations for program improvements.

AB 1451 (Holden) of the 2013-14 Session was similar in nature to AB 288 of the 2015-16 Session. This bill was held in the Senate Appropriations Committee.

AB 1540 (Hagman) of the 2013-14 Session would have specified that the governing board of a school district may authorize a pupil, at the recommendation of the community college dean of a computer science department or other appropriate community college computer science administrator, and with parental consent, to attend a community college during any session or term as a special part-time student and to undertake one or more computer science courses offered at the community college. This bill was held on the Assembly Appropriations Committee.

AB 2352 (Chesbro) of the 2013-14 Session would have removed ECHS and MCHS students concurrently enrolled at a CCC from receiving low priority admission status. This bill was held in the Senate Appropriations Committee.

# **REGISTERED SUPPORT / OPPOSITION:**

# Support

California Chamber of Commerce California Charter Schools Association California Coalition of Early & Middle Colleges (CCEMC) Career Ladders Project Central Valley Community Foundation Central Valley Higher Education Consortium Future Leaders of America Inland Empire Community Foundation Parent Institute for Quality Education San Jose-Evergreen Community College District Stanislaus Community Foundation Student Senate for California Community Colleges The Education Trust - West

# Opposition

None on file

Analysis Prepared by: Marguerite Ries / ED. / (916) 319-2087