



# College Readiness of California's High School Students

The State Can Better Prepare Students for College by Adopting New Strategies and Increasing Oversight

Report 2016-114

COMMITMENT  
INTEGRITY  
LEADERSHIP



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February 28, 2017

2016-114

The Governor of California  
President pro Tempore of the Senate  
Speaker of the Assembly  
State Capitol  
Sacramento, California 95814

Dear Governor and Legislative Leaders:

As requested by the Joint Legislative Audit Committee, the California State Auditor presents this audit report concerning access to and completion of college preparatory coursework needed for admission to the State's public university systems.

Our analysis suggests that students attending school districts that establish higher student expectations, coupled with relevant tools and student support, are more likely to meet those expectations. San Francisco Unified School District's (San Francisco) college preparatory coursework completion rates (completion rates) were significantly higher than the other two districts we reviewed—Stockton Unified School District (Stockton), and Coachella Valley Unified School District (Coachella). Specifically, in 2015 only 21 percent of Stockton's students successfully completed the college preparatory coursework, while 30 percent of Coachella's students met these requirements. In contrast, 69 percent of students in San Francisco completed college preparatory coursework. We believe the difference in completion rates is in part because San Francisco requires its students to take college preparatory courses in order to graduate and has devoted significant resources to assisting its students in this endeavor.

We also found that completion rates are influenced by whether students stay on a prescribed track each year—most notably in grade nine. At each of the three districts, we found most students who fell off track for completing the necessary coursework did so during grade nine and only 9 percent of them went on to complete the coursework necessary to gain admittance to the State's public university systems. Thus, students' academic preparedness upon entering high school significantly impacts completion rates. Funds to help kindergarten through grade eight students prepare for the rigor of college preparatory coursework could help keep more high school students on track to complete college preparatory coursework requirements by their senior year.

In addition, our review indicates that schools within our selected districts were able to provide students with sufficient access to college preparatory coursework during the years that we reviewed, but we encountered significant barriers to assessing the level of access because of the limited data the districts maintained. The California Department of Education and county offices of education could provide additional oversight, support, and guidance to districts to ensure they provide sufficient access to college preparatory coursework and adequately assist their students in completing those courses.

Respectfully submitted,



ELAINE M. HOWLE, CPA  
State Auditor

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# Contents

Summary	1
Introduction	5
<b>Chapter 1</b>	
School Districts May Be Able to Significantly Improve Students’ College Readiness by Offering a Range of Academic Supports	13
Recommendations	39
<b>Chapter 2</b>	
Increased State and County-Level Guidance and Oversight Could Improve Students’ College Preparedness	41
Recommendations	51
<b>Appendix A</b>	
Our Analysis of Student Access to College Preparatory Coursework	53
<b>Appendix B</b>	
Student Demographics of Three Selected Districts	57
<b>Responses to the Audit</b>	
California Department of Education	61
California State Auditor’s Comments on the Response From the California Department of Education	65
Coachella Valley Unified School District	67
California State Auditor’s Comment on the Response From the Coachella Valley Unified School District	69
Stockton Unified School District	71

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## Summary

### Results in Brief

In recent years, California's state and local educational agencies have increasingly focused on the importance of preparing the State's students for college. The Public Policy Institute of California projects that 38 percent of California's jobs will require at least a bachelor's degree by 2030, while population and education trends suggest that only 33 percent of working-age adults in California will have a bachelor's degree at that time—a shortfall of 1.1 million college graduates. To fill this gap, the State will need to significantly increase the number of college-ready students who graduate from its high schools each year. One measure of college readiness is a high school student's completion of the college preparatory courses necessary for admission to the University of California (UC) and California State University (CSU). In 2014–15 less than half of high school students statewide completed the college preparatory coursework that would qualify them to enroll in a UC or CSU school upon high school graduation.

Of the three districts whose efforts to improve college preparedness we reviewed—San Francisco Unified School District (San Francisco), Stockton Unified School District (Stockton), and Coachella Valley Unified School District (Coachella), we found that San Francisco's college preparatory coursework completion rates (completion rates) were significantly higher than those of the other two districts. Specifically, in 2015 only 21 percent of Stockton's students and 30 percent of Coachella's students successfully completed college preparatory coursework. In contrast, 69 percent of students in San Francisco completed college preparatory coursework. Although a number of factors contributed to the differences in the three districts' success in preparing students for college, San Francisco's prioritization of college preparatory coursework completion appears to have a significant impact. In 2010 San Francisco aligned its graduation coursework requirements with the minimum coursework requirements necessary for admission to UC and CSU.

Completion rates at the three districts we reviewed were also heavily influenced by students' abilities to complete coursework on a prescribed track beginning in grade nine. Falling off this track significantly decreases students' chances of completing college preparatory coursework. The vast majority of students in graduation years 2013 through 2015 in Coachella and Stockton fell off track at some point during their high school careers and few of those students went on to complete all the necessary college preparatory coursework by the end of high school.

### Audit Highlights . . .

*Our review of three school districts' efforts related to college preparedness highlighted the following:*

- » *College preparatory coursework completion rates were significantly higher—69 percent—in one school district compared to those in the other two districts—21 and 30 percent.*
- » *Completion rates at the three districts we reviewed were heavily influenced by students' ability to complete coursework on a prescribed track beginning in grade nine.*
- » *The vast majority of students in two of the three districts fell off track during some point in their high school careers and very few of those students went on to complete college preparatory coursework.*
- » *Although our analysis suggests that our selected schools were able to provide students with sufficient access to college preparatory coursework during certain of the years we reviewed, we encountered significant barriers to assessing the level of access for all years because of the limited data the districts maintained.*
- » *All three districts we reviewed showed achievement gaps in completing college preparatory coursework between certain subgroups of students; however even similar subgroups of students, such as English learners, fared better in one district compared to the other two.*
- » *One district has devoted significant resources to help its students, including providing targeted intervention and support for students who are not on track to meet requirements.*

*continued on next page . . .*

- » *Even though required by state law, the California Department of Education provides only minimal assistance to districts to ensure students have access to college preparatory coursework.*
- » *County offices of education could provide additional oversight, support, and guidance to districts to ensure they provide sufficient access to college preparatory coursework and adequately assist their students in completing those courses.*

Specifically, 79 percent and 84 percent of Coachella and Stockton students, respectively, fell off track and only 10 percent of Coachella and 5 percent of Stockton students completed college preparatory coursework.

At each of the three districts, we found that of the students who fell off track for completing the necessary coursework, up to 80 percent did so during grade nine, indicating that districts should ensure that students enroll in and compete college preparatory coursework beginning in their first year of high school. Furthermore, an average of only 9 percent of the students who fell off track in grade nine in the three districts we reviewed graduated with the coursework necessary to gain admission to the State's public university systems. Moreover, we found that on average, 50 percent of Stockton students, 53 percent of Coachella students, and 25 percent of San Francisco students did not pass a college preparatory English class by the end of grade nine. The percentage of grade nine students who were not prepared for the rigors of college preparatory coursework suggests that equipping kindergarten through grade eight students with the necessary skills and knowledge is critical to ensuring that they will graduate from high school having met the coursework requirements for admission to the State's public university systems.

Although our analysis suggests that the schools we selected were able to provide students with sufficient access to college preparatory coursework during certain of the years that we reviewed, we encountered significant barriers to assessing students' levels of access for all years because of the limited data the districts maintained. For example, Coachella's business practices have been to mark courses which ended prior to the final term of the school year as inactive, which made it appear that Coachella failed to offer courses even though it did actually offer them. Moreover, the districts we reviewed do not conduct analyses that demonstrate that they provided all students access to college preparatory coursework. However, our analysis of available documentation indicates that access did not significantly hamper students' ability to complete required college preparatory courses.

In addition, all three districts we reviewed showed achievement gaps in completing college preparatory coursework between certain subgroups of students. Specifically, in San Francisco, underrepresented minorities' completion rates ranged from 26 percent to 41 percent, whereas white and Asian students' completion rates ranged from 72 percent to 78 percent. Similarly, Stockton's completion rates for underrepresented minorities ranged from 17 percent to 19 percent, whereas completion rates for white and Asian students ranged from

25 percent to 29 percent.<sup>1</sup> However, other subgroups of students—such as students who are eligible to receive free or reduced price meals at school, English learners, and youth in foster care—generally fared better in San Francisco than Coachella and Stockton. In particular, San Francisco’s completion rate for these students is three times that of similar students in Stockton and two times that of students in Coachella.

Our analysis suggests that students attending school districts that establish higher student expectations, coupled with relevant tools and student support, are more likely to meet those expectations. Although all three districts we reviewed have adopted best practices to support their students during their high school careers, San Francisco in particular employs a variety of tools that have likely contributed to its high completion rates. In addition to aligning its graduation coursework requirements with coursework requirements necessary for admission to UC and CSU, San Francisco devoted significant resources and support to help its students succeed. This support includes robust credit recovery options, including options to repeat failed classes through summer school and after school, for students who do not meet requirements. San Francisco also implemented systematic, districtwide identification of students who are at risk of not meeting coursework requirements and then intervenes by meeting with those students and notifying their parents. Although Stockton and Coachella offered their own best practices, opportunities remain for improvement, particularly with regard to identifying and providing support for students who are struggling to meet college preparatory requirements.

Further, the California Department of Education (Education) and county offices of education could provide additional oversight, support, and guidance to districts to ensure they provide sufficient access to college preparatory coursework and adequately assist their students in completing those courses. Although each of the three districts we visited stressed the importance of college preparatory coursework completion, no clear statewide framework exists for ensuring that districts meet that goal. State law requires the superintendent of public instruction, who heads Education, to assist districts to ensure that all public high school students have access to a core curriculum that meets the admission requirements of UC and CSU. However, Education currently provides only minimal assistance to districts: over the last four years, the only guidance it has offered was one letter.

<sup>1</sup> We used the University of California’s (UC) definition for *underrepresented minorities*. Specifically, the UC considers underrepresented minorities to be Chicanos/Latinos, African Americans, and American Indians.

### Selected Recommendations

If the Legislature wishes to further prioritize students' completion of college preparatory coursework, it should ensure grade nine students are ready for the rigors of such work by devoting additional resources or reallocating existing resources for educational efforts beginning in kindergarten and continuing through grade eight.

To increase students' completion rates, districts should take the following actions:

- Develop and institute a model similar to San Francisco's system that will allow them to determine whether students are completing grade-level college preparatory coursework and to intervene as necessary.
- Create a robust and stable network of credit recovery options that reflect the needs of their student populations. These options—which the districts should monitor for effectiveness—should include summer school courses and evening courses.

To comply with existing law and ensure that students receive sufficient access to college preparatory coursework, Education should provide additional training and guidance to districts throughout the State on the creation and application of appropriate district and school level access analyses.

### Agency Comments

Education did not agree with our recommendation, but stated it would continue to provide assistance to districts as required by state law.

Stockton stated it is working to improve services to students in all areas, including access to and successful completion of college preparatory courses. Coachella stated that it will continue to build personnel capacity and programs to help foster improvements in both student achievement and system processes in support of students. San Francisco did not provide a response to the audit.

# Introduction

## Background

There were 420 high school districts and unified school districts—that include students from kindergarten to grade 12—in California with nearly 1.8 million enrolled high school students in the 2015–16 school year. To ensure that all of these students have the skills and knowledge necessary to succeed, districts have been increasing the emphasis they place on college readiness. According to *Higher Education in California*, a report published by the Public Policy Institute of California (PPIC), the State’s higher education system is not keeping up with the changing economy. The PPIC projects that if current trends persist, 38 percent of jobs in 2030 will require at least a bachelor’s degree. However, population and education trends suggest that only 33 percent of working-age adults in California will have bachelor’s degrees by 2030—a shortfall of 1.1 million college graduates. The PPIC suggests that the State needs to act now to close this skills gap and meet future demand.

## College Preparatory Coursework Requirements

Since 1965 the University of California (UC) has required high schools to submit for approval a list of college preparatory courses that fulfill the requirements for admission to UC. In 1976 the Legislature required of the California State University (CSU), and requested of UC, to establish a model set of uniform academic standards for high school courses for admission to CSU and UC. As Figure 1 on the following page shows, these academic standards encompass the high school coursework UC and CSU require for admission. These courses are called the *a-g courses* because of the letters assigned to each subject area: *a* is for history, *b* is for English, and so on. Only courses certified through the UC’s course approval process are valid for admission purposes to both the UC and CSU systems. The intent of college preparatory coursework is to ensure that students attain a body of general knowledge that will provide breadth and perspective to new, more advanced study.

To qualify as an a-g course, a high school course must be certified through the UC’s course approval process, as we further describe in the text box. According to UC’s associate director of undergraduate admissions, UC approves these courses based on the courses meeting specific criteria. UC maintains lists

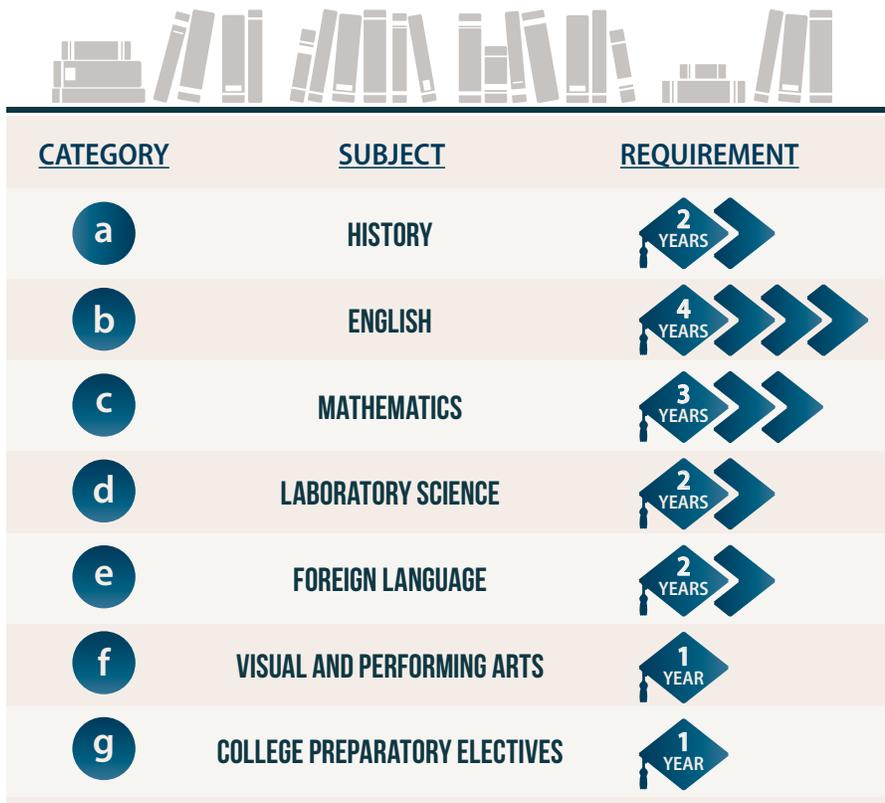
### Additional Information About the UC Course Approval Process

- All college preparatory courses must be certified by UC for students to receive college preparatory credit. Courses that are approved by UC meet both the UC and the CSU’s admission requirements. UC is the only state entity that certifies college preparatory courses. CSU adopted the same basic college preparatory curriculum and relies on UC to approve the courses.
- To certify a course, California high schools and online schools submit college preparatory courses in the seven subject areas to UC for approval.
- UC evaluates course submissions based on criteria developed by UC’s faculty.
- UC maintains lists of college preparatory courses for each school and instructs schools to update the lists regularly. The course lists for each school should include all courses available to students for the upcoming academic year.

Source: California State Auditor’s review of information from UC and the CSU.

of each school’s college preparatory courses and instructs schools to update lists annually. Although other states’ university systems have general coursework requirements, only California, Georgia, Nevada, and Kansas have statewide processes in place to centrally approve those courses required for college admission.

**Figure 1**  
Minimum College Preparatory Coursework Necessary for Admission to California’s Public Universities



Source: The University of California (UC).

Notes: Students must complete each course with a grade of C- or better to be admitted to California’s public universities. UC refers to Foreign Language as languages other than English.

State law requires districts to provide all qualified students with timely opportunities to enroll in each college preparatory course necessary to fulfill the requirements for admission to the State’s public universities. Although state law sets certain minimum graduation requirements for high school students throughout the State, districts can adopt other coursework requirements. For example, districts may require varying levels of math or foreign language requirements for students to be eligible to graduate. Similarly, school districts have the option of requiring all students to complete college preparatory coursework to graduate.

San Francisco, San Diego, and Los Angeles Unified School Districts, among others, require students to complete a full sequence of college preparatory courses before they can graduate.

### **Educational Funding and Oversight**

California's education system involves both statewide and local entities. The State Board of Education (State Board) is the State's kindergarten through grade 12 policy-making body; it also adopts academic standards, assessments, and templates for local control and accountability plans. The California Department of Education (Education), on the other hand, is responsible for implementing the policies created by the State Board and overseeing school districts. Education also receives data from schools about graduation rates, enrollments, and other statistics through a program known as the California Longitudinal Pupil Achievement Data System. In addition, the 58 county offices of education (county offices) are responsible for examining and approving school district budgets. County offices may also provide or help formulate new curricula and instructional materials and training and data processing services.

The adoption of the Local Control Funding Formula (funding formula) in 2013 revised the funding allocation for districts. In addition, under this funding formula, districts receive specific funds to help unduplicated students. State law describes an *unduplicated student* as a pupil who is either classified as an English learner, eligible for free or reduced price meals, or is a foster youth.

Further, the Legislature approved additional funding for districts in 2016 when it created the College Readiness Block Grant (Block Grant). The Block Grant allocated \$200 million to provide additional support to high school students, particularly unduplicated students, to increase the number who enroll in institutions of higher education and complete bachelor's degrees within four years. Education distributed the funds to districts based on the number of unduplicated high school students they enrolled in 2015–16. Districts can use the funds for support activities such as professional development for teachers, administrators, and counselors; counseling programs; and programs to expand access to coursework to satisfy the college preparatory course requirements.

## Scope and Methodology

The Joint Legislative Audit Committee (Audit Committee) directed the California State Auditor to conduct an audit of college preparatory coursework at a selection of high schools from three school districts. We list the objectives that the Audit Committee approved and the methods we used to address those objectives in Table 1.

**Table 1**  
**Audit Objectives and the Methods Used to Address Them**

AUDIT OBJECTIVE	METHOD
1 Review and evaluate the laws, rules, and regulations significant to the audit objectives.	Reviewed relevant laws, regulations, and other relevant background materials applicable to access to and completion of a–g courses.
2 Determine the percentage of a–g courses offered by each district and selected high school. To the extent possible, determine how many students at the high schools are eligible to enroll in these classes and whether the number of available courses is sufficient to offer courses to all eligible students.	<ul style="list-style-type: none"> <li>• Selected Coachella Valley, San Francisco, and Stockton Unified School Districts and six high schools within those districts from among the 13 potential districts noted in the audit request based on a variety of factors, including a–g completion rate, unduplicated pupil percentage, and geographic location.</li> <li>• Obtained and analyzed student-level data from our selected districts and high schools for graduation years 2013 through 2015 for all enrolled students to determine whether sufficient access to college preparatory coursework existed.</li> <li>• Reviewed master schedules at each of the six high schools.</li> <li>• Obtained and analyzed certain enrollment and completion data from the California Department of Education (Education), including the percentage of a–g courses offered and statewide completion rates.</li> <li>• All of the districts we interviewed confirmed that there are no eligibility requirements for college preparatory coursework.</li> </ul>
3 At each district and the selected high schools, determine the following information, to the extent possible, and whether barriers exist that prevent specific populations of students from enrolling in or completing a–g coursework at rates comparable to those of their peers:	<ul style="list-style-type: none"> <li>• Obtained and analyzed student-level enrollment and completion data from our selected districts and high schools for graduation years 2013 through 2015.</li> <li>• Interviewed district and high school personnel related to college preparatory coursework barriers that students may face.</li> </ul>
a. The total number of students enrolled, categorized by race, ethnicity, gender, unduplicated pupil status (as defined by California Education Code section 42238.02), and English learner status.	Obtained and analyzed student-level enrollment and completion data from our selected districts and high schools for graduation years 2013 through 2015.
b. The percentage of students, by grade, enrolled in a–g courses.	Obtained and analyzed student-level enrollment and completion data from our selected districts and high schools for graduation years 2013 through 2015.
c. Enrollment rates for a–g courses by course, grade, race, ethnicity, gender, unduplicated pupil status, and English learner status.	Obtained and analyzed student-level enrollment and completion data from our selected districts and high schools for graduation years 2013 through 2015.

AUDIT OBJECTIVE	METHOD
<p>d. The percentage of students on track to complete a–g coursework by grade.</p>	<ul style="list-style-type: none"> <li>• Obtained and analyzed student-level enrollment and completion data from our selected districts and high schools for graduation years 2013 through 2015.</li> <li>• Defined an <i>on track</i> model based on University of California (UC) and California State University (CSU) credit and course requirements and interviews with district personnel. This model does not account for all of the means by which students can bypass the general a–g coursework requirements. For example, the UC and CSU allow students to take and pass an Advanced Placement exam instead of completing a related a–g course. Moreover, there are certain validation rules for circumstances in which students are presumed to have completed the lower-level coursework if they have successfully completed advanced work in an area of sequential knowledge. Our model includes the foreign language validation rule. Finally, our model considers students to have met the requirements if they received a C- or better in each course.</li> </ul>
<p>e. The a–g course completion rate by course, grade, race, ethnicity, gender, unduplicated pupil status, and English learner status.</p>	<ul style="list-style-type: none"> <li>• Obtained and analyzed student-level enrollment and completion data from our selected districts and high schools for graduation year 2013 through 2015.</li> <li>• Interviewed district and high school personnel related to college preparatory coursework completion.</li> <li>• Obtained and analyzed student transcripts.</li> <li>• Identified and verified district, high school, and charter school best practices related to college preparatory coursework completion.</li> </ul>
<p>f. The average grade point average (GPA) for students completing a–g coursework by grade, race, ethnicity, gender, unduplicated pupil status, and English learner status.</p>	<p>Obtained and analyzed student level enrollment and completion data, including GPAs, from our selected districts and high schools for graduation years 2013 through 2015.</p>
<p>4 Review and assess the process that the districts and high schools use to offer a–g coursework to students.</p>	<ul style="list-style-type: none"> <li>• Interviewed district and high school personnel to determine the process used to create the master schedule each year and to submit a–g courses for approval to the UC.</li> <li>• Reviewed and assessed the UC’s a–g requirements and its process for reviewing and approving a–g courses.</li> <li>• Compared UC approved a–g courses to courses offered at our selected high schools.</li> <li>• Determined the level of outreach and interaction the UC has with districts and schools.</li> </ul>
<p>5 Review and assess any other issues that are related to the audit.</p>	<ul style="list-style-type: none"> <li>• Interviewed and gathered documents from Education, County Offices of Education, the California Collaborative for Education Excellence, the State Board of Education, and the UC to determine their role, if any, related to college preparatory coursework.</li> <li>• Obtained and analyzed the college preparedness portions of the local control and accountability plans for each of the three districts.</li> <li>• Interviewed personnel in the remaining 10 districts noted in the audit request related to college preparatory coursework access and completion.</li> <li>• Reviewed other states to determine whether similar a–g requirements exist.</li> <li>• Obtained a list from the UC of all school districts in the State that did not offer at least one course in each a–g category. We verified that those districts all offer at least one course in each a-g category, either by correcting past master schedule errors, or by offering online courses that would satisfy the requirement.</li> </ul>

Sources: California State Auditor’s analysis of Joint Legislative Audit Committee audit request number 2016-114, planning documents, and analysis of information and documentation identified in the column titled *Method*.

### Assessment of Data Reliability

In performing this audit, we obtained electronic data files extracted from the information systems listed in Table 2 beginning on the following page. The U.S. Government Accountability Office, whose standards we are statutorily required to follow, requires us to assess the sufficiency and appropriateness of computer-processed information that we use to support findings, conclusions, or recommendations. Table 2 describes the analyses we conducted using data from these information systems, our methods for testing, and the results of our assessments. Although these determinations may affect the precision of the numbers we present, there is sufficient evidence in total to support our audit findings, conclusions, and recommendations.

**Table 2**  
**Methods Used to Assess Data Reliability**

INFORMATION SYSTEM	PURPOSE	METHOD AND RESULT	CONCLUSION
<b>San Francisco Unified School District (San Francisco)</b>  Synergy Student Information System (Synergy) for 2013–14 through 2014–15  Student Information System for 2009–10 through 2012–13  Horizon System National School Lunch Program data for 2009–10 through 2014–15  Foster Focus System foster youth data for 2009–10 through 2014–15	To determine a–g completion rates by students’ race, ethnicity, gender, unduplicated pupil status, and English learner status.	<ul style="list-style-type: none"> <li>We performed data-set verification and electronic testing of key data elements and did not identify any significant issues. We did not perform full accuracy and completeness testing of these data because they come from partially paperless systems, and thus, hard-copy source documentation was not consistently available for review. However, to gain some assurance that San Francisco’s data contained information for students applicable to our analysis, we reconciled the total number of students included in San Francisco’s data for each academic year to the enrollment data the California Department of Education (Education) publishes on its website.</li> <li>To gain some assurance that San Francisco correctly identified college preparatory coursework, we compared a selection of course data to the University of California’s (UC) listing of certified courses and found that San Francisco had misidentified 10 courses. However, these courses did not ultimately affect any students’ overall completion of a–g requirements.</li> </ul>	<b>Undetermined reliability for this purpose.</b>  Although this determination may affect the precision of the numbers we present, there is sufficient evidence in total to support our findings, conclusions, and recommendations.

INFORMATION SYSTEM	PURPOSE	METHOD AND RESULT	CONCLUSION
<p><b>Stockton Unified School District (Stockton)</b></p> <p>Synergy for 2009–10 through 2014–15</p> <p>eOfficeSuite National School Lunch Program data for 2009–10 through 2012–13</p> <p><b>Coachella Valley Unified School District (Coachella)</b></p> <p>Aeries Student Information System for 2009–10 through 2014–15</p>	<p>To determine a–g completion rates by students’ race, ethnicity, gender, unduplicated pupil status, and English learner status.</p>	<ul style="list-style-type: none"> <li>• We performed data-set verification and electronic testing of key data elements and did not identify any significant issues. We did not perform full accuracy and completeness testing of these data because they come from partially paperless systems, and thus, hard-copy source documentation was not consistently available for review. However, to gain some assurance that the districts’ data contained information for students applicable to our analysis, we reconciled the total number of students included in each district’s data for each academic year to the enrollment data Education publishes on its website.</li> <li>• To gain some assurance that the districts correctly identified college preparatory coursework, we compared a selection of course data to UC’s listing of certified courses and found Stockton and Coachella had misidentified a total of 60 courses and 13 courses, respectively. These errors resulted in 171 students appearing to meet a–g requirements when they may not have actually met the requirements.</li> <li>• We also identified limitations related to the data. Specifically, we were unable to identify students who attended Stockton as freshmen in 2009–10, but did not enroll with the district in subsequent years. This is because Stockton was still exclusively using its legacy system for 2009–10. When Stockton transitioned from the legacy system to Synergy, it only copied data for 2009–10 over to Synergy if the student was still enrolled with the district at the time of the transition to Synergy.</li> <li>• Further, Coachella acknowledged that its data for students’ free or reduced price meal status is incomplete. Free or reduced price meal status is one component used to identify a student’s unduplicated pupil status. However, using Coachella’s available free or reduced price meal data combined with other data, we were still able to identify 92 percent or more of students in each of the three Coachella cohorts as having unduplicated pupil status.</li> </ul>	<p><b>Not sufficiently reliable for this purpose.</b></p> <p>Although this determination may affect the precision of the numbers we present, there is sufficient evidence in total to support our findings, conclusions, and recommendations</p>
<p><b>San Francisco</b></p> <p>Synergy for 2013–14 through 2014–15</p> <p><b>Stockton</b></p> <p>Synergy for 2011–12 through 2014–15</p>	<p>To determine if there was sufficient college preparatory-level coursework offered for students.</p>	<ul style="list-style-type: none"> <li>• We performed data-set verification and electronic testing of key data elements and did not identify any significant issues. We did not perform accuracy and completeness testing of these data because they come from partially paperless systems, and thus, hard-copy source documentation was not consistently available for review. However, to gain some assurance that the course data included all courses actually offered by the districts, we compared 60 courses from student transcripts to the data and did not identify any issues.</li> <li>• As discussed previously, Stockton misidentified courses as college preparatory coursework certified, even though UC had not certified them. However, we were able to correct for these errors in this analysis using supplemental information from UC.</li> </ul>	<p><b>Undetermined reliability for this purpose.</b></p> <p>Although this determination may affect the precision of the numbers we present, there is sufficient evidence in total to support our findings, conclusions, and recommendations.</p>
<p><b>Education</b></p> <p>California Longitudinal Pupil Achievement Data System for 2014–15</p>	<p>To determine the percent of high school classes at each district that satisfies an a–g requirement.</p>	<p>We performed data-set verification and electronic testing of key data elements and did not identify any significant issues. We did not perform accuracy and completeness testing of these data because they are submitted by local educational agencies and any supporting documentation is maintained throughout the State. We reconciled the total number of classes and students included in the data to the numbers Education reported through its website to gain some assurance that Education provided all of its relevant data.</p>	<p><b>Undetermined reliability for this purpose.</b></p> <p>Although this determination may affect the precision of the numbers we present, there is sufficient evidence in total to support our findings, conclusions, and recommendations.</p>

Sources: California State Auditor’s analysis of various documents, interviews, and data from Education, Coachella, San Francisco, and Stockton.

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# Chapter 1

## SCHOOL DISTRICTS MAY BE ABLE TO SIGNIFICANTLY IMPROVE STUDENTS' COLLEGE READINESS BY OFFERING A RANGE OF ACADEMIC SUPPORTS

### Chapter Summary

Our review suggests that when school districts (districts) prioritize college preparatory coursework and the support they provide to students, they significantly affect the likelihood that students will graduate from high school having taken the coursework necessary for admission into the State's public university systems. In 2010 the San Francisco Unified School District (San Francisco) aligned its graduation coursework requirements with the minimum coursework requirements necessary for admission to the University of California (UC) and California State University (CSU) systems, effectively requiring all its students to complete college preparatory coursework to graduate.<sup>2</sup> Of the three districts we reviewed—San Francisco, Stockton Unified School District (Stockton), and Coachella Valley Unified School District (Coachella)—we found that San Francisco's college preparatory coursework completion rates (completion rates) were significantly higher than those of the other two districts. Specifically, in 2015 only 21 percent of Stockton's students successfully completed the college preparatory coursework, while 30 percent of Coachella's students met these requirements. In contrast, 69 percent of students in San Francisco completed college preparatory coursework.

Completion rates at the three districts we reviewed were also heavily influenced by students' ability to complete coursework on a prescribed track beginning in grade nine. We found that the majority of students who fell off track at some point during their high school careers did so during grade nine. Although few of these students in any of the three districts went on to complete the remainder of their college preparatory coursework, we found that San Francisco provided a number of resources that ensured that significantly more of its students met the necessary requirements. Similarly, underrepresented minorities and English learners in all three districts showed achievement gaps in completing college preparatory coursework but fared better in San Francisco than in the other districts we reviewed—another likely result of the amount of support San Francisco provides.

<sup>2</sup> Although San Francisco students must complete the full sequence of college preparatory coursework, they only need to receive a grade of D or better in these classes to graduate. However, to be eligible for admission to the State's public university systems, students must receive a grade of C- or better in these classes.

### Completion Rates of College Preparatory Coursework Vary Widely by School District but Can Be Improved With Increased Expectations and Appropriate Interventions

School districts statewide, and the three school districts we selected for review, varied widely in the rates at which their students completed college preparatory coursework. However, the data show that school districts, such as San Francisco, can increase completion rates when they increase expectations and corresponding interventions and support. According to data maintained by the California Department of Education (Education), completion rates for districts within the State ranged from 11 percent to 61 percent in 2014–15, with 43 percent of students completing college preparatory coursework requirement statewide. Education’s data also indicated that Stockton’s and Coachella’s completion rates were 35 percent and 29 percent, respectively, in 2014–15. In contrast, Education’s data indicated that San Francisco’s completion rate was 60 percent—the second-highest average statewide.

Using a different methodology, which yielded similar results, we conducted a detailed analysis of student-level cohort data to determine the completion rates for students who were enrolled in grade nine in each of the districts we reviewed.<sup>3</sup> As Figure 2 illustrates, the completion rates for students in the 2013 through 2015 graduating classes ranged from 19 percent to 22 percent in Stockton, 25 percent to 31 percent in Coachella, and 61 percent to 69 percent in San Francisco.

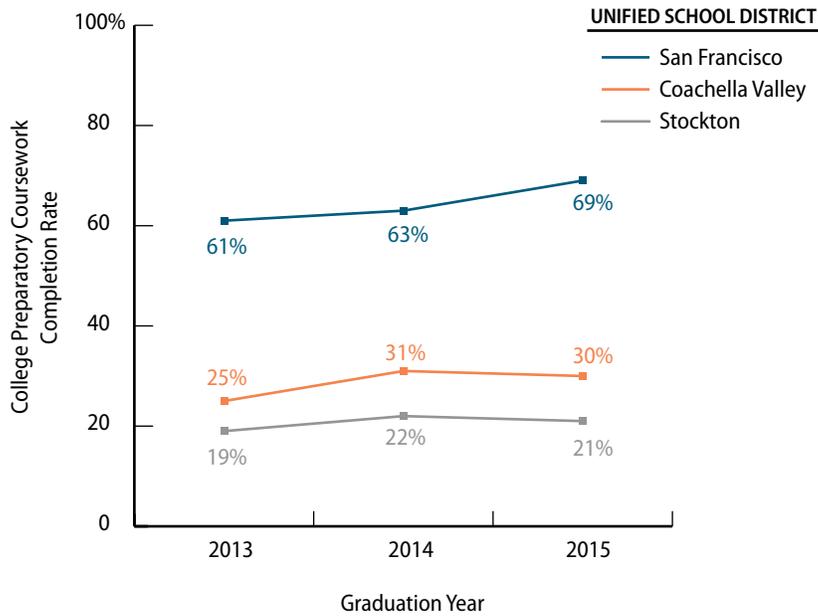
***Students’ ability to stay on a prescribed track is critical to their completing college preparatory coursework.***

Students’ ability to stay on a prescribed track is critical to their completing college preparatory coursework. For students to complete college preparatory coursework necessary for admission into UC or CSU by the end of grade 12, they must enroll in and complete—with a grade of C- or better—15 courses across several subjects, as we show in Figure 3 on page 16.<sup>4</sup> We considered students who enrolled in and completed the minimum number of courses with a grade of C- or better each year in the prescribed sequence to be on track. Students must complete multiple courses for many of these subjects. For example, students must take four years of English; thus, most students who wish to meet the State’s public university systems’ admission standards will need to complete a college preparatory English course during each of their four high school years.

<sup>3</sup> Each cohort is composed of students who were enrolled in the ninth grade in a given district for the first time in 2009–10, took a class for credit at a high school within the respective audited district, and received a valid mark. Subsequent cohorts reflected a similar methodology for 2010–11 and 2011–12. Students remained in the cohort until they left the district.

<sup>4</sup> UC and CSU require applicants to receive a C or better in all college preparatory courses to be eligible for admission. Because UC and CSU do not calculate minuses or pluses (such as a C- or C+), a student who receives a C- would still be eligible for admission.

**Figure 2**  
College Preparatory Coursework Completion Rates Vary Significantly in the Three Districts We Reviewed  
Graduation Years 2013 Through 2015

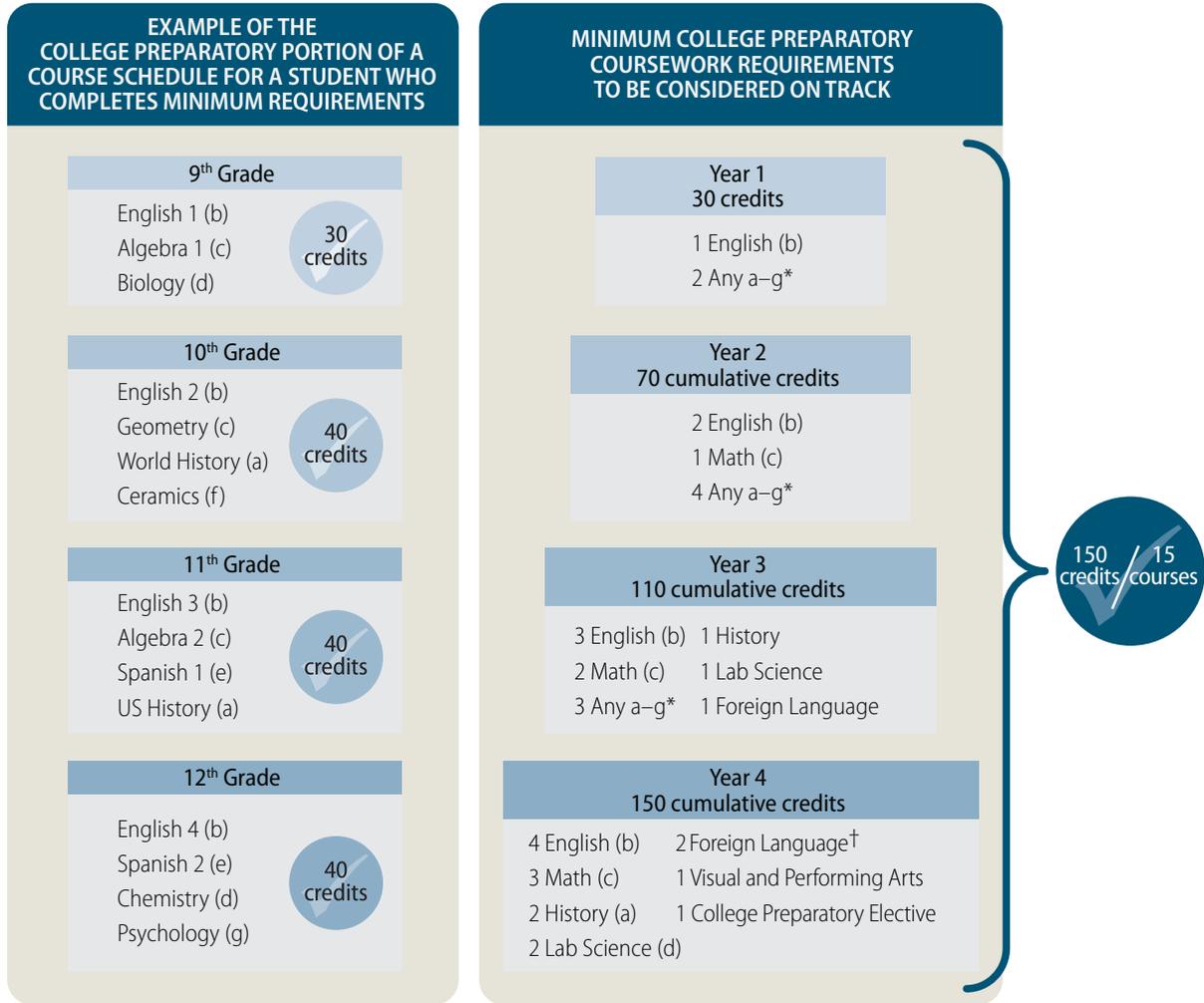


Source: California State Auditor’s analysis of student data provided by Coachella Valley, San Francisco, and Stockton Unified School Districts.

Note: We excluded students who left the district.

As Table 3 on page 17 shows, the majority of students in graduation years 2013 through 2015 in Coachella and Stockton fell off track at some point during their high school careers and few of those students went on to complete all the necessary college preparatory coursework by the end of high school. Specifically, 79 percent and 84 percent of Coachella and Stockton students, respectively, fell off track at some point during their four years of high school, and only 10 percent and 5 percent of those students were able to eventually get back on track and meet all coursework requirements. San Francisco was more successful at keeping students on the prescribed track: 41 percent fell off track at some point during their high school careers and the district helped a higher percentage—13 percent—of off-track students to eventually complete all the college preparatory coursework requirements. These data suggest that districts should focus resources, when limited, on keeping students on track and, in particular, on helping students successfully complete grade nine required coursework.

**Figure 3**  
Students Must Complete a General Sequence of Courses to Be On Track to Complete College Preparatory Requirements by the End of Their Fourth Year



Source: California State Auditor’s analysis of policies provided by Coachella Valley, San Francisco, and Stockton Unified School Districts, and the University of California (UC).

Notes: Students must pass all courses with a grade of C- or better.  
Credits for courses attended during summer school count toward the prior school year.

\* a–g = History (a), English (b), Math (c), Science (d), Foreign Language (e), Visual and Performing Arts (f), College Preparatory Elective (g).

† Although students must complete two years of foreign language courses, validation rules can be applied to meet these requirements by successfully completing the second semester of a level 2 or higher foreign language course. This could reduce the number of cumulative credits required.

**Table 3**  
**Students Who Fell Off Track at Any Point During High School Were Not Likely to Complete College Preparatory Requirements**  
**Graduation Years 2013 Through 2015**

UNIFIED SCHOOL DISTRICT	TOTAL NUMBER OF STUDENTS WHO FELL OFF TRACK	PERCENTAGE OF TOTAL STUDENT POPULATION WHO FELL OFF TRACK	RESULTS OF THE STUDENTS WHO FELL OFF TRACK			
			MET REQUIREMENTS BY THE END OF HIGH SCHOOL		DID NOT MEET REQUIREMENTS BY THE END OF HIGH SCHOOL	
			NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Coachella Valley	2,459	79%	245	10%	2,214	90%
San Francisco	3,706	41	482	13	3,224	87
Stockton	3,904	84	212	5	3,692	95

Source: California State Auditor’s analysis of data provided by Coachella Valley, San Francisco, and Stockton Unified School Districts.

Note: We excluded students who left the district.

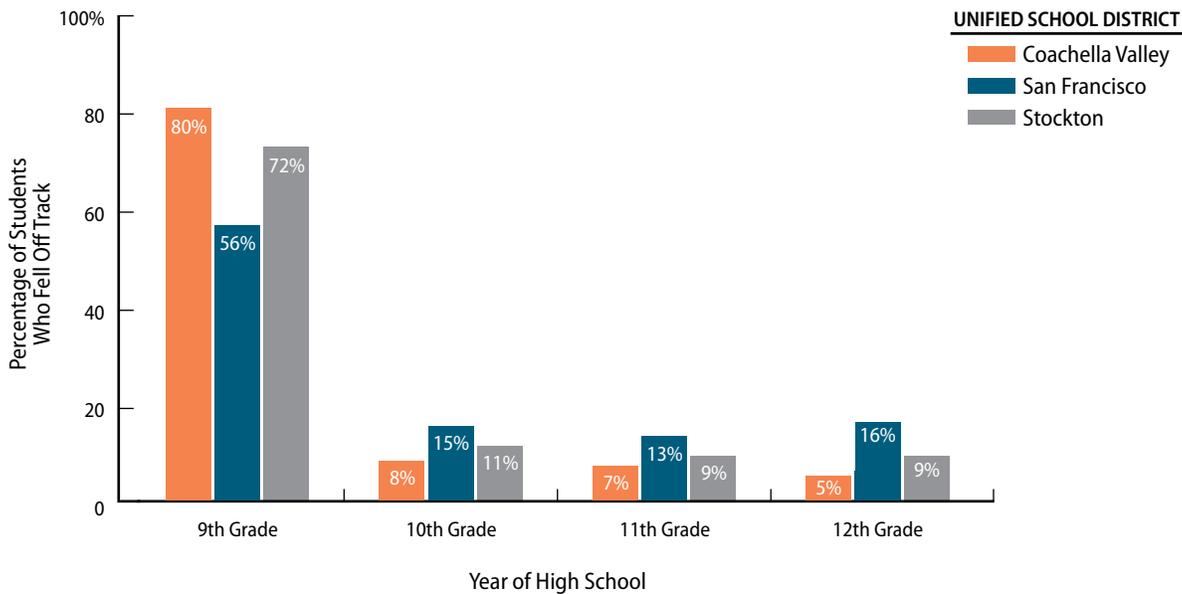
**Students Who Fail to Meet College Preparatory Requirements as Freshman Are Unlikely to Complete Coursework Needed for Admission to the State’s Public University Systems**

Completion rates at the three districts we reviewed depended heavily on students’ ability to complete coursework on a prescribed track beginning in grade nine. At each of the three districts, we found that the majority of students who fell off this track did so during grade nine and few of them went on to complete the remainder of their college preparatory coursework. Thus, it is imperative that districts ensure students’ enrollment in and successful completion of college preparatory coursework beginning in their first year of high school.

Seventy-two percent of students who fell off track in Stockton, 80 percent of those who did so in Coachella, and 56 percent of those who fell of track in San Francisco, fell off track during grade nine, as Figure 4 on the following page shows. Of concern is that an average of only 9 percent of the students who fell off track in grade nine in the three districts we reviewed completed the coursework necessary to gain admission to the State’s public university systems, which highlights the importance of that first year of high school. Moreover, as Figure 5 on page 19 shows, students in San Francisco who fell off track in grade nine had slightly better success—10 percent—in completing college preparatory coursework than comparable students in Coachella and Stockton—at 6 percent and 3 percent, respectively. Falling off track during grade nine likely presents the greatest challenge for students because getting back on track requires them to successfully complete an even more demanding course load than their peers

who did not fall off track. For example, if a ninth-grade student receives an F in English 1, that student would need to receive a C- or better in both English 1 and 2 in a subsequent year, in addition to passing their other necessary classes, to get back on track.

**Figure 4**  
Most Students Who Fell Off Track Did So in Grade Nine  
Graduation Years 2013 Through 2015



Source: California State Auditor's analysis of student data provided by Coachella Valley, San Francisco, and Stockton Unified School Districts.

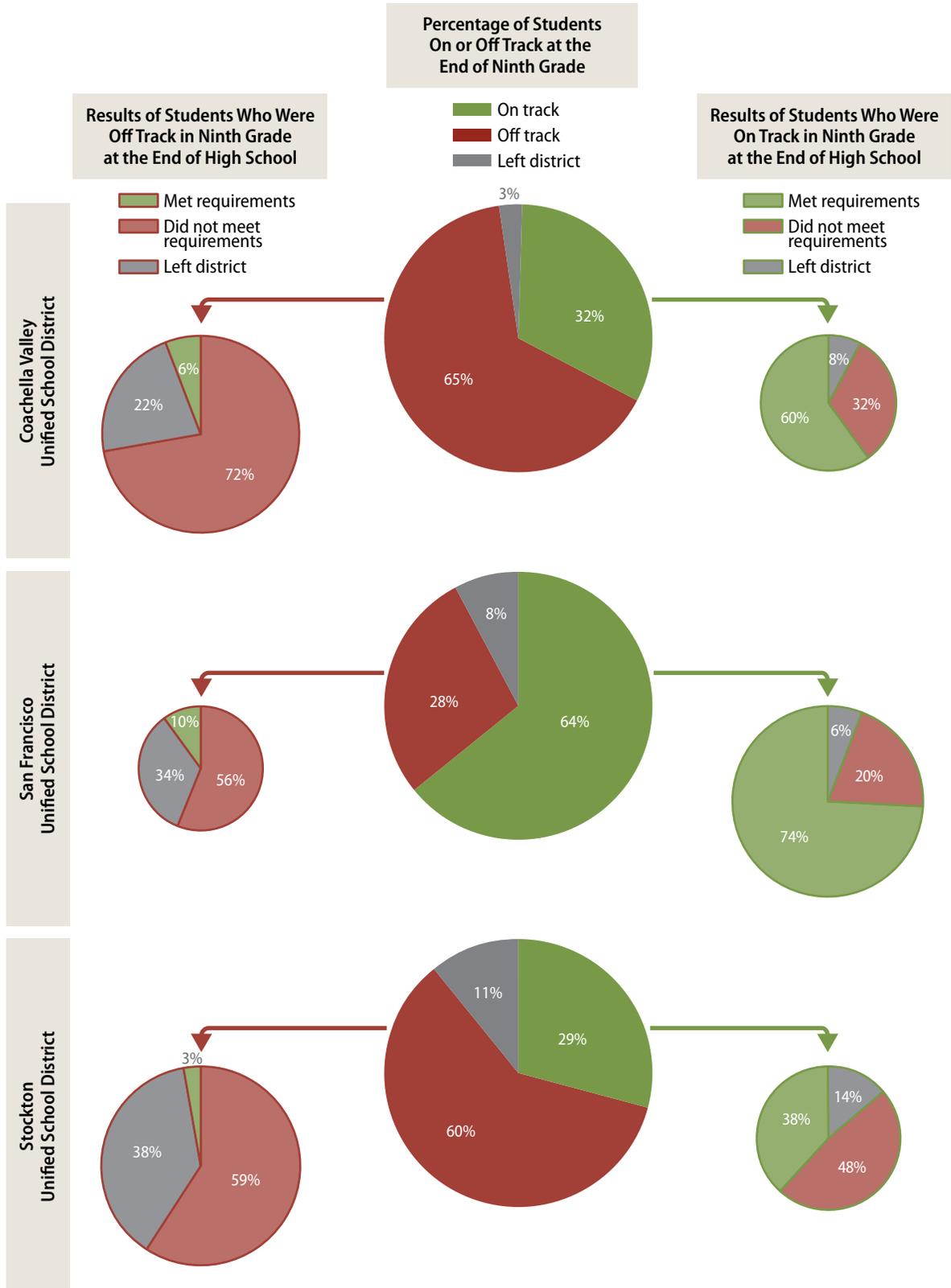
Notes: We calculated the number of students who fell off track to meet college preparatory requirements during each year of school for students in graduation years 2013 through 2015.

We excluded students who left the district.

Percentages may not add to 100 due to rounding.

Our analysis shows that students struggled most significantly with English and math courses—the two subject areas which CSU and UC require be taken for the most years. As Figure 6 on page 21 shows, we found that for students in graduation years 2013 through 2015, about 60 percent of students in Stockton and Coachella did not meet the English and math college preparatory course requirements. In San Francisco, about 25 percent of students did not meet these requirements. We found that, on average, 50 percent of Stockton students, 53 percent of Coachella students, and 25 percent of San Francisco students did not pass a college preparatory English class by the end of grade nine. Further, on average, about 40 percent of students in Stockton, 35 percent of students in Coachella, and 13 percent of students in San Francisco had not passed a college preparatory math class by grade 10.

**Figure 5**  
Most Students Who Fell Off Track in Grade Nine Did Not Complete College Preparatory Coursework  
Graduation Years 2013 Through 2015



Source: California State Auditor's analysis of student data provided by Coachella Valley, San Francisco, and Stockton Unified School Districts.

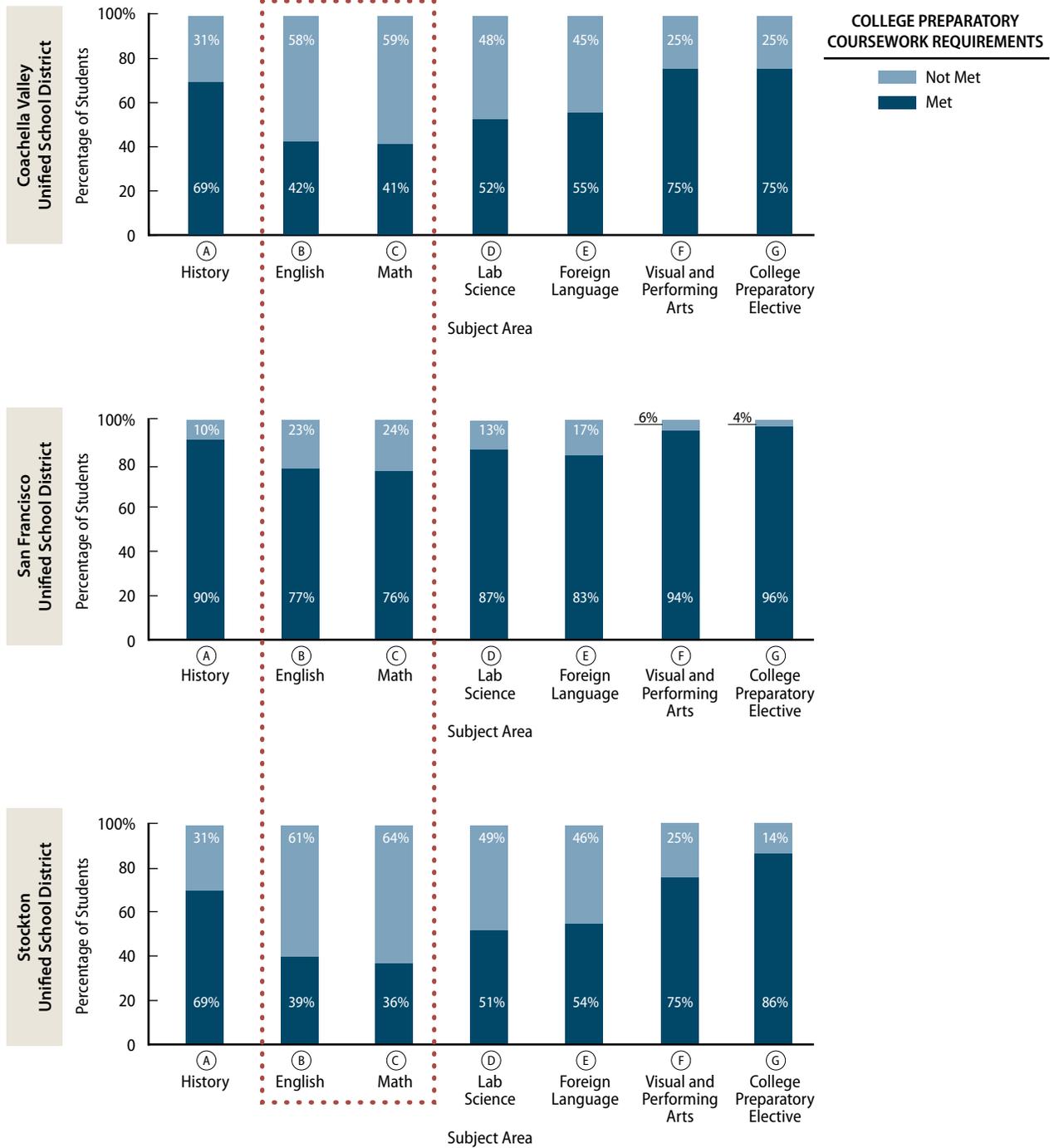
***Many Stockton and Coachella students needed additional assistance in grade nine to pass some college preparatory courses.***

Many Stockton and Coachella students needed additional assistance in grade nine to pass some college preparatory courses. Districts offer support classes to provide supplementary or preventative assistance to help students successfully complete college preparatory coursework. Districts enroll students in these support courses when they determine that students are not academically prepared for college preparatory coursework. These classes can be taken before enrolling in a college preparatory course or simultaneously. We reviewed districts' enrollment figures for support classes and found that an average of 60 percent of Coachella's grade nine students enrolled in a math support class and 30 percent of grade nine students enrolled in an English support class. The executive curriculum director at Stockton indicated that a barrier to college preparatory coursework completion is a lack of students adequately prepared for grade level coursework as freshmen. In Stockton, the district identified math support courses in which 14 percent of its grade nine students were enrolled. In contrast, San Francisco's policy is to automatically enroll students in college preparatory courses, rather than support courses.

The percentage of students enrolled in college preparatory courses does not appear to have a significant impact on completion rates. There is not a noteworthy gap between districts related to the percentage of students enrolled in college preparatory courses. As Figure 7 on page 22 shows, San Francisco enrolled an average of only 3 percent more of its grade nine students in college preparatory English courses than did Stockton for graduating years 2013 through 2015. Given that San Francisco's completion rate is considerably higher than Coachella's and Stockton's, it appears that factors other than the enrollment rates in those courses influenced completion rates.

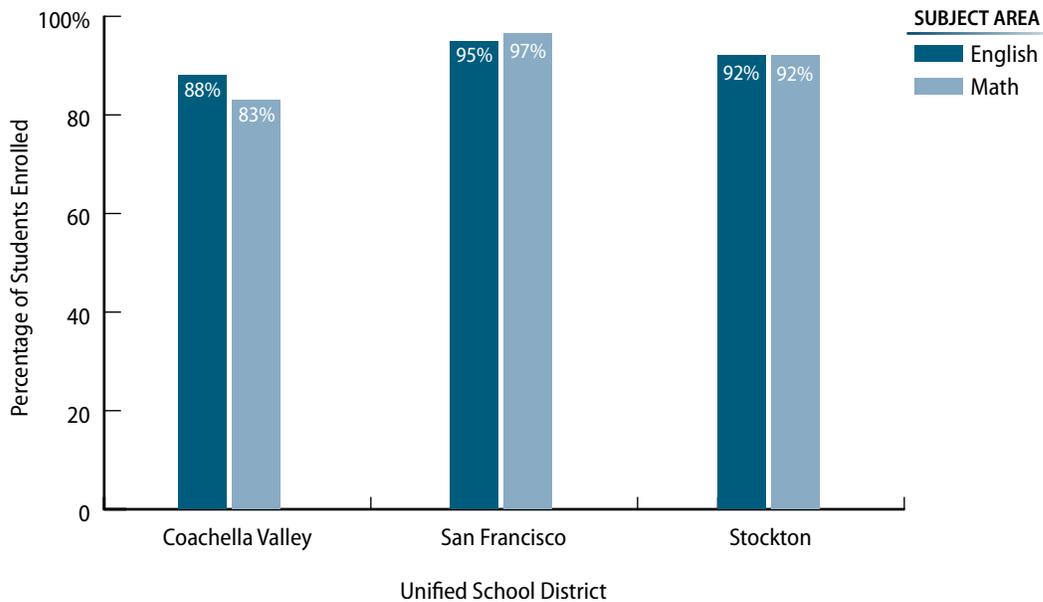
Funds to help kindergarten through grade eight students prepare for the rigor of college preparatory coursework could help keep more high school students on track to complete the coursework requirements by their senior year. In 2016 the Legislature approved a similar funding strategy for high school students. The College Readiness Block Grant (Block Grant) allocated \$200 million to provide additional support to high school students, particularly unduplicated students, to increase the number of students who enroll in institutions of higher education and complete a bachelor's degree within four years. Districts could use those funds for support activities such as professional development, counseling programs, and programs to expand access to classes to satisfy the college preparatory coursework requirements.

**Figure 6**  
English and Math Requirements Presented the Greatest Challenge to Students  
Graduation Years 2013 Through 2015



Source: California State Auditor's analysis of data provided by Coachella Valley, San Francisco, and Stockton Unified School Districts.  
Note: We excluded students who left the district.

**Figure 7**  
Average Enrollment Rates in College Preparatory Math and English Courses in Grade Nine Did Not Vary Significantly  
Graduation Years 2013 Through 2015



Source: California State Auditor's analysis of student data provided by Coachella Valley, San Francisco, and Stockton Unified School Districts.

San Francisco presented a plan for its Block Grant that focused on college counseling, city college dual enrollment efforts, and using micro funding tailored to meet individual school needs. Stockton's approach included increasing services to high school students, specifically its unduplicated students, through increased staffing oversight, covering assessment fees for standardized tests for college admission, and assigning a dedicated mentor to incoming students to support them throughout their high school experience. Stockton plans to establish a freshman boot camp to support incoming students, followed by field trips to colleges. Students would have the opportunity to meet with counselors who review assessments and transcripts. Stockton also plans to enhance its data collection efforts to measure the effectiveness of its plans. According to the director of state and federal projects at Coachella, the district has yet to submit its plan to Education, but plans to do so in February 2017. We believe that similar funding and support strategies targeted at kindergarten through grade eight students could help prepare California's students for meeting the minimum coursework requirements needed for admission to UC and CSU.

**Although the Schools We Reviewed Appear to Have Provided Sufficient Access to College Preparatory Coursework for Certain Years, the Data Were Significantly Limited for Other Years**

State law requires school districts that maintain any grades from seven to 12 inclusive to offer all of their students coursework that will allow them to meet the minimum requirements for admission to California's public postsecondary educational institutions. To evaluate whether sufficient access existed, we reviewed the percentage of total courses offered at each of the three districts we visited, and found that the percentages did not vary significantly among the districts. Specifically, in 2014–15, 55 percent and 58 percent of all the courses offered at Coachella and Stockton, respectively, were college preparatory courses. In San Francisco, this percentage was 63. We also conducted a detailed course-by-course analysis by reviewing the schedules of courses offered at two high schools in each of three school districts and compared the courses offered to the schools' enrollments. When the schools had maintained the information we needed, we found that they had provided students with sufficient access to college preparatory coursework. This finding suggests that access did not present a significant barrier to the completion of college preparatory courses. However, four of the six high schools were unable to supply us with the data necessary to determine that they had provided sufficient access for all years in our audit period.

The data available suggests that adequate capacity existed to allow students to take the full range of college preparatory requirements during grades nine through 12 at the six schools we selected. For example, to allow students to take the required four years of college preparatory English, traditional semester-based high schools should offer access to these classes for 100 percent of their students every year. The two schools in Coachella exceeded this obligation during the years for which data were available: Coachella Valley High School provided a sufficient number of seats for 169 percent of its students in 2011–12, and Desert Mirage High School provided enough seats for 119 percent of its students in 2014–15 as Appendix A beginning on page 54 demonstrates. Likewise, San Francisco offered seats for more than 100 percent of its students at Mission and Washington high schools during 2013–14 and 2014–15—the years for which the schools were able to provide usable data.

In Stockton, however, Franklin High School satisfied the minimum English access requirement by enrolling students past the maximum capacity of 32 students per section. For example, Franklin High School overenrolled 116 students in 24 different English sections. The Franklin High School principal did not respond to our numerous requests for perspective on this issue. Moreover, during

*When the schools had maintained the information we needed, we found that they had provided students with sufficient access to college preparatory coursework.*

that same period, Franklin High School enrolled 213 students in other college preparatory courses, such as chemistry and earth science, beyond the maximum capacity for sections of those courses. We also reviewed course enrollments during 2014–15 at George Washington High School in San Francisco and Desert Mirage High School in Coachella. At George Washington High School, we found 22 students overenrolled in 16 college preparatory sections, and at Desert Mirage High School we identified four students who were overenrolled. Thus, although these high schools technically met the access requirement—Franklin High School in particular—they did so in a manner that may have negatively affected the success of all the students in those overenrolled sections.

Furthermore, although each high school we reviewed did not meet the minimum access requirements in every category for every year, as Table A beginning on page 54 in Appendix A shows, these deficiencies were unlikely to have affected students' opportunities to complete all of the college preparatory requirements. For example, several schools failed to meet the minimum two-year foreign language requirement. However, admissions criteria allow students to take only one year of a foreign language if it is a higher level course, potentially decreasing the number of foreign language courses that schools need to offer.<sup>5</sup> In other instances, schools that did not offer enough college preparatory elective classes had excess capacity in other course categories such as English or foreign language, so students could take those courses to satisfy their elective requirements. Table A includes explanations for why some schools' failure to meet certain access targets likely did not harm students.

Additionally, we verified that all of our selected schools other than Coachella Valley High School offered courses with sufficient frequency so that students had the ability to take the courses they needed during the school day in 2014–15. In other words, we did not identify any cases in which a school offered all courses for multiple categories—such as English and math—during the same period of the day. Thus, the times at which schools offered courses did not present a barrier to students' access to those classes for 2014–15. We were unable to verify that Coachella Valley High School offered courses with sufficient frequency throughout the school day because it did not retain this information.

The manner in which our selected schools built their course schedules likely resulted in them offering sufficient access to college preparatory courses for the years we were able to review. The schools within our selected districts asserted that each year they used a number of factors to build their course schedules, including schedule types,

***We did not identify any cases in which a school offered all courses for multiple categories—such as English and math—during the same period of the day.***

<sup>5</sup> There are several other ways to validate the foreign language requirement, including certification by a high school principal and assessment by a college or university.

graduation requirements, and student requests. These factors enabled the schools to determine which college preparatory courses students wanted or needed each year. When we spoke with other districts, including San Diego Unified and Vallejo City Unified, they stated that—similar to San Francisco—they provide sufficient access based on college preparatory-aligned graduation requirements.

Although we were able to reach certain conclusions about course access at the six high schools we selected, significant data limitations impeded our ability to definitively determine whether the schools in the districts we reviewed provided adequate course access for each year we reviewed from 2011–12 through 2014–15. For example, San Francisco’s former data system, which it used through 2012–13, did not track whether the courses it offered were for a semester or a full year. Coachella’s practice has been to mark courses that ended before the final term of the school year as inactive, which made it appear that Coachella failed to offer courses even though it did actually offer them. Stockton, as we discuss later, incorrectly marked 60 courses as college preparatory coursework certified, even though UC had not certified them. However, our review did not address whether the districts as a whole were offering appropriate levels of access to college preparatory courses because that would require evaluating every high school in the district.

Districts would need to conduct analyses similar to what we performed to demonstrate they are offering appropriate levels of access; however, none of the three we reviewed have done so. The data limitations we identified serve to illustrate the improvements in data retention and analysis that would be necessary for districts to demonstrate whether they provide all students with required access to college preparatory coursework. Without the proper data systems and processes in place, the districts cannot demonstrate to their stakeholders that they are complying with state law.

### **Although Achievement Gaps Exist in All Three Districts We Reviewed, Certain Subgroups of Students Fared Better in San Francisco Than in Coachella and Stockton**

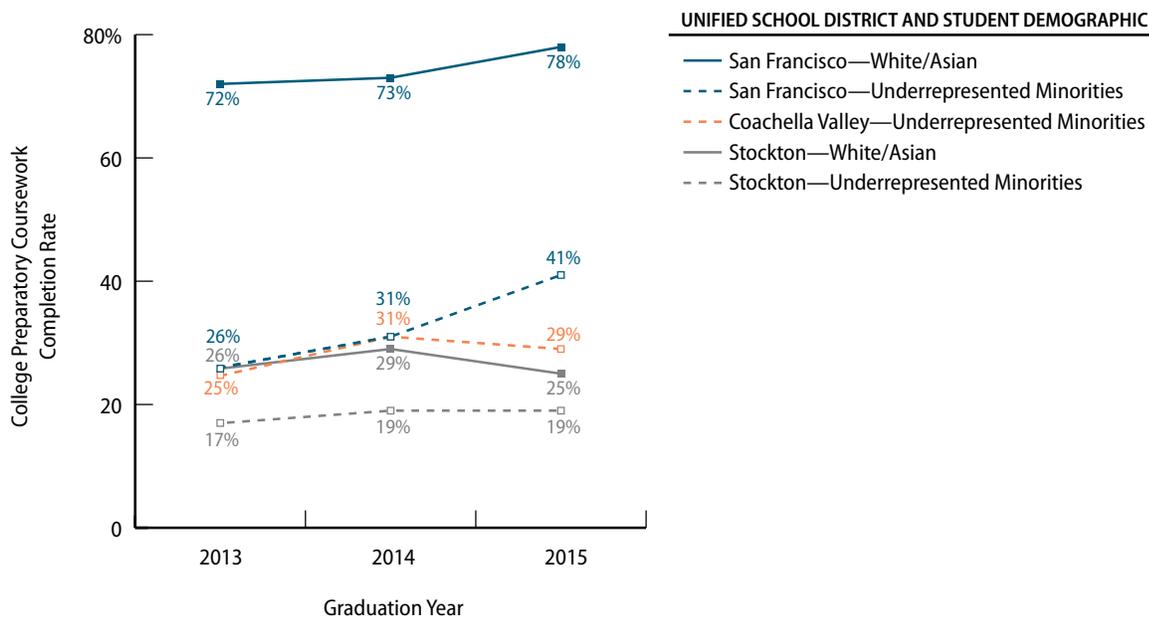
In all three districts we reviewed, we identified achievement gaps in completing college preparatory coursework; however, certain subgroups of students—such as underrepresented minorities, and English learners—generally fared better in San Francisco than in Coachella or Stockton.<sup>6</sup> As we show in Figure 8, on the

*Significant data limitations impeded our ability to definitively determine whether the high schools in the districts we reviewed provided adequate course access for each year we reviewed.*

<sup>6</sup> We used UC’s definition for underrepresented minorities. Specifically, UC considers underrepresented minorities to be Chicanos/Latinos, African Americans, and American Indians.

following page, for students in graduation years 2013 through 2015, underrepresented minorities' completion rates in San Francisco ranged from 26 percent to 41 percent.<sup>7</sup> These rates were generally less than half of those of white and Asian students, ranging from 72 percent to 78 percent. Stockton's achievement gap narrowed for students in graduation years 2014 through 2015 due to the declining completion rate among white and Asian students. Stockton's underrepresented minorities' completion rates ranged from 17 percent to 19 percent, whereas completion rates for white and Asian students ranged from 25 percent to 29 percent. In Coachella, the completion rates for underrepresented minorities ranged from 25 percent to 31 percent.

**Figure 8**  
**Completion Rate Achievement Gaps Exist Among Demographic Subgroups**  
**Graduation Years 2013 Through 2015**



Source: California State Auditor's analysis of student data provided by Coachella Valley, San Francisco, and Stockton Unified School Districts.  
Notes: We did not include students who identified as white or Asian in Coachella because the subgroup is made up of fewer than 50 students. State law instructs the California Department of Education to report completion rates only for subgroups whose population exceeds 50 students.

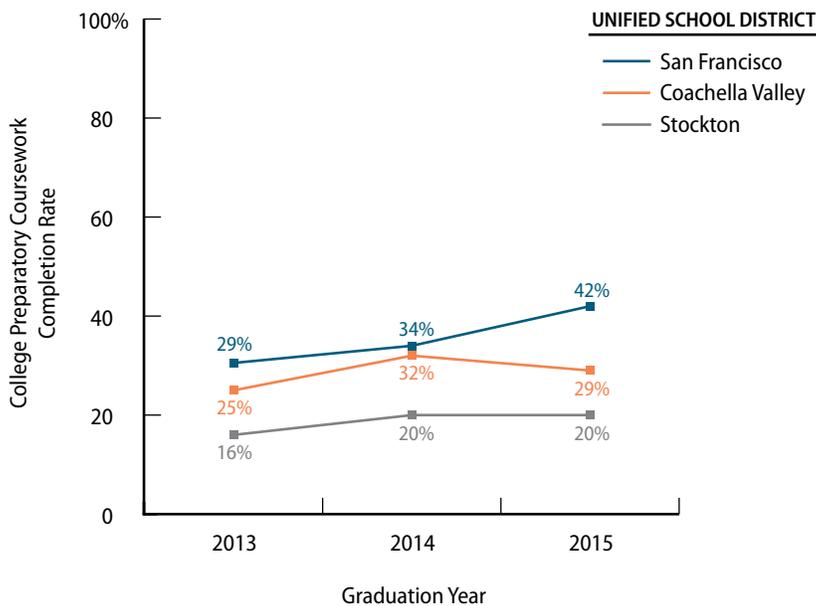
For the purpose of this analysis, we used the University of California's (UC) definition for underrepresented minorities. Specifically, UC considers underrepresented minorities to be Chicano/Latino, African American, and American Indian.

We excluded students who left the district.

<sup>7</sup> We did not include students who identified as white or Asian in Coachella because the subgroup is made up of fewer than 50 students. State law instructs Education to report completion rates only for subgroups whose population exceeds 50 students.

Moreover, an appreciably higher percentage of Chicano/Latino students in San Francisco completed college preparatory requirements than did so in the other two districts we reviewed. Specifically, 42 percent of Chicano/Latino students in San Francisco’s 2015 graduating class completed all college preparatory coursework, compared to only 29 percent in Coachella and 20 percent in Stockton, as Figure 9 shows. Chicano/Latino students averaged 96 percent of the student population in Coachella, 57 percent of the student population in Stockton, and 21 percent of the student population in San Francisco from 2012–13 through 2014–15.

**Figure 9**  
**Chicano/Latino Students in San Francisco Completed College Preparatory Coursework at Higher Rates Than in Coachella Valley or Stockton**  
**Graduation Years 2013 Through 2015**



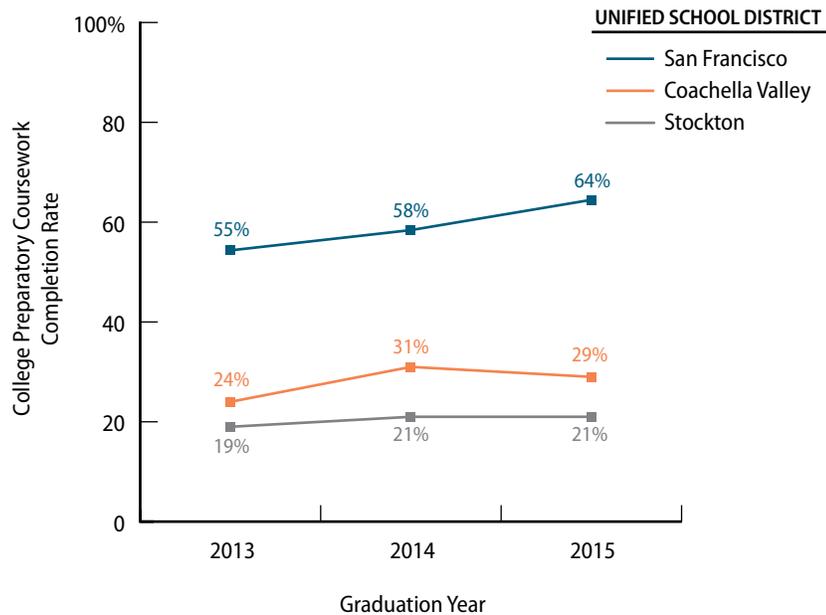
Source: California State Auditor’s analysis of student data provided by Coachella Valley, San Francisco, and Stockton Unified School Districts.

Note: We excluded students who left the district.

Furthermore, San Francisco’s completion rate for *unduplicated students*—students who are eligible to receive free or reduced price meals at school, English learners, and youth in foster care—was three times that of similar students in Stockton and two times that of students in Coachella, as Figure 10 on the following page illustrates. English learners—a subgroup of unduplicated students—in San Francisco also had significantly higher completion rates than those in Stockton and Coachella, as we show in Figure 11 on page 29.

However, English learners had the lowest completion rate out of any subgroup we evaluated across all districts. Interestingly, we found that reclassified English learners had higher completion rates than English-fluent students across all three districts as Table B.2 on page 59 in Appendix B shows. *Reclassified English learners* are students who were initially classified as English learners but who subsequently met criteria for English proficiency. Completion rates for reclassified English learners in graduation years 2013 through 2015 ranged from 74 percent to 78 percent in San Francisco, from 43 percent to 51 percent in Coachella, and from 26 percent to 29 percent in Stockton. These completion rates ranged from 5 percent to 23 percent higher than those of English-fluent students within the same districts over the same time period.

**Figure 10**  
**Completion Rate for Unduplicated Pupils in San Francisco Was Notably Higher Than in Coachella Valley or Stockton**  
**Graduation Years 2013 Through 2015**



Source: California State Auditor’s analysis of student data provided by Coachella Valley, San Francisco, and Stockton Unified School Districts.

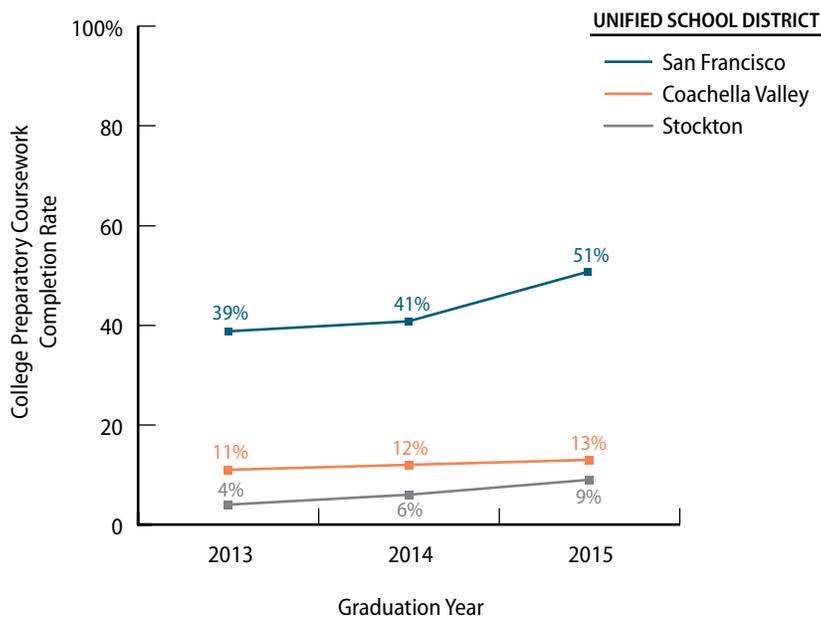
Notes: State law defines *unduplicated pupils* as youth in foster care, students eligible to receive free or reduced price meals, and English learners.

We excluded students who left the district.

When we questioned staff at the three districts, we received disparate opinions regarding the reasons for the achievement gaps. The assistant superintendent of San Francisco indicated that he was aware of the achievement gaps and was pleased that they appeared to be narrowing; however, he does not have perspective about why they exist. The executive director of curriculum for Stockton

contended that multiple factors may affect outcomes for students of different ethnic backgrounds, including cultural expectations as reflected in the UC enrollment data. Principals from San Francisco and Stockton, and counselors from Coachella, indicated that English learners face challenges to completing college preparatory coursework. One stated that this is in part because they are learning the English language while at the same time they are expected to learn the curriculum in English. However, staff from Coachella indicated that reclassified English learners have higher completion rates because these students receive significant support from their districts and schools, and staff from Stockton and San Francisco indicated that meeting the high reclassification standards requires enormous effort on the part of the students.

**Figure 11**  
**English Learners in San Francisco Had Significantly Better College Preparatory Course Outcomes**  
**Graduation Years 2013 Through 2015**



Source: California State Auditor’s analysis of student data provided by Coachella Valley, San Francisco, and Stockton Unified School Districts.

Note: We excluded students who left the district.

**By Implementing Best Practices, Districts May Be Able to Improve Students’ College Preparedness**

As we discuss throughout this chapter, San Francisco has been consistently more successful than the other two districts we reviewed in ensuring that students complete college preparatory coursework.

***Although all the districts we visited have implemented some support services, San Francisco has taken the additional step of implementing a systematic districtwide identification and intervention for students who are at risk of not meeting the coursework requirements.***

Not only has San Francisco aligned its coursework graduation requirements with the minimum coursework necessary for admission to UC and the CSU, it also employs a variety of best practices to provide students with sufficient support during their high school careers. These practices include a process to identify students who have fallen off track to complete college preparatory coursework requirements, targeted interventions for students who do not meet college preparatory coursework requirements, various credit recovery options, and a robust centralized process to ensure course certification. Although Stockton and Coachella offered their own best practices, opportunities remain for improvement, particularly with regard to course certification processes and to providing more consistent identification of and assistance to students who are struggling to meet college preparatory requirements.

***San Francisco Has Implemented a System to Provide Timely Interventions for Students Who Fall Off Track for Completing College Preparatory Coursework***

The districts we visited have implemented support services to assist students who are struggling to complete college preparatory coursework, and they have established pathways for students to recover credits. However, San Francisco has taken the additional step of implementing a systematic districtwide identification and intervention for students who are at risk of not meeting the coursework requirements for admissions eligibility to the State's public universities. According to San Francisco's executive director of the office of college and career readiness, the district's high completion rates are due to several factors. In addition to its 2010 alignment of its graduation coursework requirements with college preparatory coursework requirements, San Francisco attributes its success to its centralized process and ongoing identification of off track students coupled with targeted interventions for those students.

San Francisco implemented a process to identify students who have fallen off track to completing college preparatory coursework requirements. San Francisco's executive director of the office of college and career readiness explained that the district began identifying students who were off track to complete college preparatory requirements in 2013–14 after working with Stanford University to develop its off track definitions. San Francisco's policy defines students as *off track* if they do not receive a grade of D or better in college preparatory courses or do not complete a specific number of credits dependent on their grade level.<sup>8</sup>

<sup>8</sup> Although San Francisco students must complete the full sequence of college preparatory coursework, they only need to receive a grade of D or better in these classes to graduate. However, to be eligible for admission to the State's public university systems, students must receive a grade of C- or better in these classes.

San Francisco's policy involves both districtwide and local efforts during fall and spring semesters. The district creates a list of students who have fallen off track. Although school counselors in the other districts we reviewed meet with students at various times throughout the school year and document those meetings in different ways, San Francisco school counselors are required to meet with the off track students, discuss credit recovery options such as summer and evening school, and document the conference using academic review plans that record student progress toward completion of coursework requirements. Further, San Francisco sends a letter to the parents of students who have fallen off track and conducts a series of community meetings to meet with families of students who are not meeting grade-level requirements. These targeted interventions are an important component of San Francisco's high college preparatory coursework completion rates.

Coachella lacks similarly robust processes to intervene with students who have fallen off track to complete college preparatory coursework. Beginning in 2014–15, Coachella contracted with the Riverside County Office of Education (Riverside County) to conduct a college preparatory transcript analysis. Riverside County's analysis identifies whether students are off track, on track, or potentially on track to meeting college preparatory requirements. However, the analysis only recommends course schedule alterations for students who are close to meeting or are already meeting requirements, but not for students determined to be off track. There is no policy requiring counselors to meet with all students who are identified as not meeting college preparatory requirements. The director of secondary education said it would not be effective to alter course schedules for students who do not have a possibility of getting back on track to meet the college preparatory coursework requirements.

Stockton has no process in place to identify whether a student has fallen off track or to intervene when students are not on track to meet college preparatory requirements. Instead, the executive director of curriculum explained that the district expects counselors to review graduation progress with students and to discuss their college preparatory coursework completion progress as part of those meetings. However, the lack of a formal process means that the district has no way of ensuring that all affected students receive such meetings or that the meetings include discussions of the actions the students should take to ensure they complete the college preparatory coursework. We believe districts without criteria for determining whether students are meeting college preparatory requirements and formal processes for intervening when students fall off track may not be adequately supporting students at a critical point in their academic careers.

***Unlike San Francisco, Coachella and Stockton have no policy requiring counselors to meet with all students who are identified as not meeting college preparatory requirements.***

### ***San Francisco Offers More Comprehensive Programs to Assist Struggling Students Than the Other Districts We Reviewed***

We met with personnel in each district we reviewed to discuss best practices and found that the approaches the three districts employed in achieving college readiness for their students varied significantly, as we show in Table 4. Reported practices ranged from district-level physical and mental wellness centers to school-specific efforts, such as freshman mentoring groups led by faculty and administrators. We found that San Francisco offered a more comprehensive selection of programs to assist students than did either Coachella or Stockton, which likely contributes to its higher completion rates.

**Table 4**  
**Districts and Schools Employ a Variety of Best Practices**

BEST PRACTICES	UNIFIED SCHOOL DISTRICT		
	COACHELLA VALLEY	SAN FRANCISCO	STOCKTON
Robust centralized process for college preparatory coursework certification		✓	
Credit recovery—Saturday school		✓	
Credit recovery—evening school/extended school day	✓	✓	✓
Credit recovery—online courses	✓	✓	✓
Credit recovery—summer school	✓	✓	✓
Robust district level college preparatory coursework off track reports		✓	
City college dual enrollment	✓	✓	✓
Fifth year graduation option	✓	✓	✓
After school tutoring	✓	✓	✓
Academies/special programs within comprehensive high schools	✓	✓	✓
District counseling handbook		✓	

Source: California State Auditor's interviews with school and district personnel from Coachella Valley, San Francisco, and Stockton Unified School Districts.

Note: We asked each district to provide a list of practices that they asserted helped them in improving college preparatory completion rates and supporting students.

✓ = Best practice present throughout district.

✓ = Best practice reported as present throughout district, but support not provided.

San Francisco attributes its student college preparatory success in part to intervention systems such as credit recovery options for students who need to retake courses. For example, although all three districts reported offering several credit recovery options for students, San Francisco provided the greatest variety of options. Its offerings included Saturday school, summer school, extended day, evening, online courses, enrollment in community colleges, and a fifth year graduation option.

Stockton's and Coachella's credit recovery offerings were inconsistent from year to year. For example, Edison High School in Stockton at one point provided Saturday school; however, it stopped offering the program when the grant that funded it was discontinued. Similarly, Coachella currently offers credit recovery by providing summer school; however, this option has only been available for the past two years. Moreover, San Francisco enrolled more students in its credit recovery options than Coachella—22 percent compared to 13 percent, respectively. San Francisco provided data showing that more than 4,200 students enrolled in credit recovery offerings in 2014–15. The largest of these programs were evening and summer school. Stockton was not able to provide data related to enrollment in its credit recovery options.

San Francisco is able to provide additional credit recovery options in part using supplemental local funding through a grant program it calls Sprout. According to the executive director of the office of college and career readiness, these grants range from about \$3,000 to \$10,000 per school and their purpose is to provide an equitable distribution of additional funds to schools regardless of the population served, location, or size. San Francisco describes Sprout grants as providing critical micro funding to local school sites to support a variety of intervention and credit recovery programs, which the schools propose to the district for funding approval. For example, in fall 2013, the district reported that one of its schools used Sprout funding to offer an additional literature course after school, which was opened to all district students who wished to attend. According to a case analysis provided by San Francisco, participants included a high percentage of Latino or African-American students, and more than half were identified as off track to graduate by one semester. The case analysis concluded that more than 80 percent of students who attended the course completed it with a grade of D or higher at a total cost of \$5,700.

***San Francisco's Centralized Course Certification Process Helps to Ensure the Accuracy of Its College Preparatory Efforts***

As we discussed in the Introduction, districts must submit potential college preparatory courses to UC for approval. To ensure that this process works smoothly, San Francisco has established a strong centralized course certification and management process, which benefits both students and educators. This system could provide similar benefits not only in Coachella and Stockton but throughout the State. As Figure 12 on page 35 illustrates, San Francisco's process for developing a new college preparatory course involves a school working with the district course manager (manager). The supervisor of secondary programs stated that the manager writes all or a substantial portion of the documents San Francisco

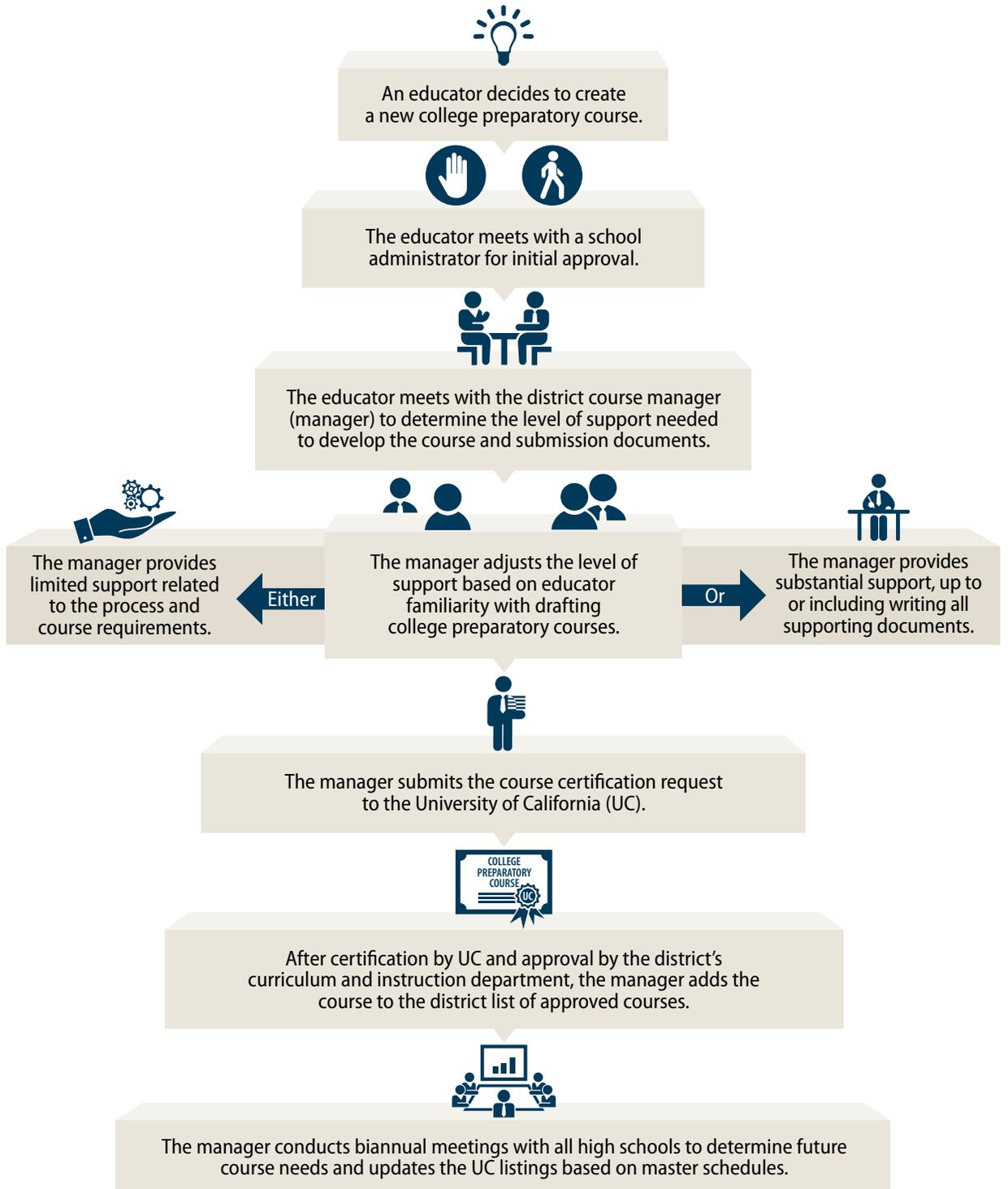
eventually submits to UC for certification, thus lessening the load on educators. The manager also meets with the administration at each school on a biannual basis to check the accuracy of the school's master schedule compared to UC's approved course lists. The robust nature of San Francisco's certification process has reduced instances of misidentified courses, which—as we discuss below—can disadvantage students. Furthermore, the manager's detailed knowledge of the certification process can assist educators by reducing the work associated with course creation.

In contrast, Stockton and Coachella lack strong centralized college preparatory coursework certification processes. For instance, although Stockton had a staff member who acts as a centralized coordinator, the district misidentified a total of 60 courses over four academic years in the two schools we reviewed. Based on the number of incorrectly identified courses, Stockton has not implemented an effective review with all high schools to reconcile their master schedules with UC's college preparatory course listings. Coachella does not have a dedicated, centralized coordinator, other than the director of secondary education, who oversees administrators at each school site. Each site-specific administrator manages the college preparatory submission for that particular school.

***Because districts incorrectly identify college preparatory courses as certified by UC, students could enroll in those courses believing that they are certified, even though they are not.***

The impact of poor processes is that districts incorrectly identify college preparatory courses as certified by UC, and students could enroll in those courses believing that they are certified, even though they are not. Our review of Stockton's database identified numerous errors in the master schedules of our selected schools. Specifically, from 2011 through 2015, Stockton incorrectly identified 60 courses as having been approved by UC, when they had not been certified, as shown in Table 5 on page 36. These classes included Spanish, Biology, and French and likely should have been college preparatory certified, but were not. Similarly, Coachella misidentified at least 13 courses; however, problems with its database prevented us from reviewing all potentially incorrectly certified courses. Although San Francisco incorrectly identified 10 courses, no students were adversely affected.

**Figure 12**  
School Districts Should Adopt a Strong Centralized Process Similar to San Francisco’s for College Preparatory Course Submission and Maintenance



Sources: California State Auditor’s analysis of San Francisco Unified School District’s centralized process documentation and interviews.

**Table 5**  
**Students' Abilities to Meet College Preparatory Coursework Requirements May Be Negatively Affected if Districts Misidentify Courses**

UNIFIED SCHOOL DISTRICT	COURSES MISIDENTIFIED AT SELECTED SCHOOLS	STUDENTS WHO MIGHT HAVE BEEN AFFECTED BY MISIDENTIFIED COURSES
Coachella Valley	13	118
San Francisco	10	0
Stockton	60	53
<b>Totals</b>	<b>83</b>	<b>171</b>

Sources: California State Auditor's analysis of data obtained from Coachella Valley, San Francisco, and Stockton Unified School Districts' master schedules, transcript data, and the University of California Course Management Portal.

Note: In Coachella and Stockton, these course misidentifications took place in 2011 through 2015. In San Francisco, the course misidentifications took place in 2013 through 2015.

Table 5 illustrates that Stockton's and Coachella's misidentified courses from 2011–12 through 2014–15 resulted in at least 171 students who would have otherwise completed all college preparatory coursework and may have been unable to meet UC and CSU coursework admission requirements. Moreover, Stockton provided a student handbook, which listed several courses as certified when the UC had not actually certified them. This mistake may have caused students who planned to attend a UC or CSU school to select courses that would not have met the eligibility requirements for these institutions. We do not know whether UC or CSU would have actually denied admission to the students who took these courses; nevertheless, the potential effect of these errors on students serves to demonstrate the importance of a strong centralized process.

When asked for perspective about why these errors occurred, Coachella's director of secondary education noted that the district was aware of the problems and that the majority of courses that were listed incorrectly had been removed or were in the process of being certified by the district. Stockton's curriculum specialist, who acts as the manager of college preparatory courses for the district, provided two different reasons for the errors, including a lack of understanding of the UC's update and submission process when she initially took on the role in 2013 and the district's process used to update UC's college preparatory database. Although all districts misidentified some courses as certified, the number of misidentified courses and the resulting number of affected students in Stockton and Coachella demonstrate flawed district processes. If the districts did not correct the processes, they run the risk that there are a far greater number of misidentified courses affecting students at the remaining high schools in the districts.

***Some Charter High Schools Employ Best Practices to Improve College Readiness That Other Districts and Schools in the State Could Also Use***

The charter high schools we reviewed in the cities of Coachella, Stockton, and San Francisco, respectively, reported college preparatory completion rates that exceeded the results of the State, as we show in Table 6. Although charter schools in general have varied academic goals and missions, the three charter schools we selected each focus on preparing students to excel in college. Thus, during our audit period, they employed a variety of methods and practices to support their students in completing college preparatory coursework.

**Table 6**  
**Charter Schools Reported College Preparatory Completion Rates That Exceeded the State Average**

ACADEMIC YEAR	COMPLETION RATE OF GRADUATING SENIORS			STATE AVERAGE
	NOVA ACADEMY* (COACHELLA)	GATEWAY CHARTER HIGH SCHOOL (SAN FRANCISCO)	STOCKTON EARLY COLLEGE ACADEMY	
2012–13	†	86%	†	39%
2013–14	55%	75	53%	42
2014–15	60	75	73	43

Sources: Unaudited data provided by Nova Academy, Gateway Charter High School, and Stockton Early College Academy.

\* Nova Academy is an independent charter school.

† Nova Academy and Stockton Early College Academy did not have a graduating class of seniors in 2012–13.

For example, all three charter high schools we reviewed require students to enroll in classes that stress skills needed to excel in both high school and college. In particular, Gateway Charter High School (Gateway) in the city of San Francisco makes use of a program called College Counseling that educates students about both four- and two-year colleges similar to another program implemented throughout the district. As part of this program, Gateway designed its curriculum to create a culture that encourages students to attend college. Further, it takes its students to visit colleges, and it assists them with applications, financial aid, and test preparation for college admissions. Similarly, Nova Academy—an independent charter school operating in the city of Coachella—offers seminar courses that focus on the skills necessary for college admission. These seminars culminate with the students’ creating senior portfolios. Stockton Early College Academy concentrates its efforts on a high school success class that it provides to all incoming grade nine students. In this course, students learn goal-setting, the use of planners, study skills, and note-taking. All three charter schools reported that these courses are important parts of their best practices.

*Stockton Early College Academy's peer tutoring program uses students as peer tutors, which bolsters support to students who receive tutoring while providing experience to the peer tutors.*

The three charter high schools also use some other best practices. For example, Gateway delivers targeted interventions by using a process it calls Response to Intervention. This process implements escalating levels of individual support to students who have truancy problems or fail to meet grade expectations. The support it provides to students who do not meet grade expectations varies based on student needs, but it may include alternatives such as tutoring, course-specific conferences, or referrals for assessments of attention and learning difficulties. Similarly, Stockton Early College Academy stated that it offers support through staff-supervised peer tutoring four days a week in both math and science. This program uses students as peer tutors, which bolsters support to students who receive tutoring while providing experience to the peer tutors.

Finally, Nova Academy offers several best practices, including a Summer Advantage program that prepares its incoming grade nine students by providing placement exams and activities related to math and English. Students at Nova Academy are also evaluated on a monthly basis for potential referral to an additional support program called LINK, which includes after school tutoring conducted two days a week. The school evaluated students for referral to LINK based on criteria including failure of any class or missing assignments in one or more classes. All of the programs noted in this section provide additional support to students and may increase college preparatory completion rates.

### **Districts Risk Leaving Students Behind When They Align Their Graduation Requirements With the College Preparatory Requirements, But Do Not Provide Additional Support**

As we demonstrated in the previous sections, San Francisco's completion rates have risen in recent years not only because it aligned its graduation requirements with the college preparatory coursework the State's public university systems require, but also because it devoted significant resources to ensuring students had the support necessary to complete that coursework. As San Francisco's efforts have shown, the alignment of graduation requirements with college preparatory coursework requirements coupled with the application of sufficient resources can yield significant successes for California's college-bound students.

San Francisco's executive director of college and career readiness stated that the district aligned its graduation requirements with college preparatory coursework requirements in conjunction with carefully thought-out and adequately funded systems of support. Beginning in fiscal year 2013–14 and continuing through fiscal year 2015–16, San Francisco dedicated \$2.4 million to \$2.6 million from the Public Education Enrichment Fund (PEEF)—a local fund

that the city of San Francisco voters established in 2004—specifically toward college preparatory coursework support. It used these funds to expand course options for off track students by adding evening and after school courses and to support six full-time and one half-time positions for data analysis, counseling, and districtwide coordination. San Francisco increased its completion rate by 6 percent in the first year it devoted resources from the PEEF for college preparatory coursework support. San Francisco plans to continue spending these funds to support college preparatory coursework completion for the foreseeable future.

In addition to San Francisco, a number of other school districts throughout the State have also recently aligned their graduation requirements with the college preparatory coursework requirements, including both Los Angeles Unified School District (Los Angeles) and San Diego Unified School District. However, Los Angeles' recent efforts to transition to college preparatory requirements as a condition of graduation demonstrates that unless the districts that make this transition also dedicate sufficient resources to assist students with the increased challenges these courses present, they may put many of their students at risk not only of failing to meet college preparatory requirements, but also of failing to graduate from high school.

Specifically, Los Angeles aligned its graduation requirements with the college preparatory coursework requirements beginning with the class of 2017. However, in 2015 the Board of Education of the city of Los Angeles (board) projected that only 37 percent of the class of 2017 would meet the requirement and thus graduate from high school. In response, the board renewed its commitment to college preparatory coursework completion by passing a resolution to focus on supporting those students most at risk of not successfully completing the sequence of college preparatory courses by expanding course access outside of the regular school day through summer school, community college dual enrollment, and online courses. In addition, the board directed Los Angeles' Superintendent to eliminate the requirement for a C grade or better in college preparatory courses as a condition of graduation. Los Angeles also reported that it spent \$10.6 million on an immediate intervention plan to provide students with various credit recovery options, tutorial services, tiered interventions, and training in college preparatory courses for all its teachers.

## Recommendations

If the Legislature wishes to further prioritize students' completion of college preparatory coursework, it should help ensure grade nine students are ready for the challenge of such work by devoting additional resources or reallocating existing resources for educational efforts beginning in kindergarten and continuing through grade eight,

*Unless the districts also dedicate sufficient resources to assist students with the increased challenges these courses present, they may put many of their students at risk of failing to meet college preparatory requirements.*

particularly to support math and English college readiness. Funding mechanisms similar to the College Readiness Block Grant could help better prepare kindergarten through grade eight students for the rigors of college preparatory coursework in high school.

To ensure that districts throughout the State comply with existing law, the Legislature should require districts to conduct analyses to verify that all high school students receive acceptable levels of access to the full range of college preparatory coursework. If the Legislature decides to require these analyses, it should also consider whether additional funding may be necessary to support the districts' associated administrative costs. If implemented, the analyses should require the following components:

- Districts should report the results of their analyses to Education.
- Education should issue an annual report to the Legislature detailing all districts with high schools that have failed to demonstrate sufficient access.

To increase students' access to and completion rates of college preparatory coursework, districts should take the following actions:

- Develop and institute an on track/off track student identification model similar to San Francisco's model that will allow them to determine whether students are completing grade-level college preparatory coursework. The districts should notify parents when they identify students as falling off track and should advise the parents and students of available support and credit recovery options. Furthermore, school staff should be required to meet with and document the support they provide to these students.
- Create a robust and stable network of credit recovery options that reflect the needs of their student populations. These options—which the districts should monitor for effectiveness—should include summer school courses and evening courses.
- Create and institute a centralized process for submitting, managing, and tracking college preparatory courses and certification requests. This process should maximize the number of certified courses that the district offers. Further, to ensure that students receive appropriate credit for their college preparatory coursework, this process should match the UC's course listings with each school's master schedule of courses.

## Chapter 2

### INCREASED STATE AND COUNTY-LEVEL GUIDANCE AND OVERSIGHT COULD IMPROVE STUDENTS' COLLEGE PREPAREDNESS

#### Chapter Summary

Although the State has emphasized the importance of ensuring that high school graduates meet the admission standards for its public university systems, it has not established a clear statewide framework to make certain that school districts (districts) provide sufficient access to college preparatory coursework. Perhaps as a consequence, each of the three districts we reviewed have adopted different priorities and strategies related to college preparatory coursework completion, as we discuss in Chapter 1. By increasing the assistance they provide to districts, state and local entities could better ensure students have sufficient access to college preparatory coursework and consistent support to enable them to successfully complete that coursework. For example, despite the statutory responsibility that the state superintendent of public instruction (superintendent) has to assist districts, the California Department of Education (Education) did little to help them during our three-year audit period. Further, county offices of education (county offices) could provide additional oversight and support to districts to ensure they offer sufficient access to college preparatory coursework. Although other entities are also involved in activities related to increasing college readiness, they have no oversight responsibilities.

In addition, local communities have little ability to assess districts' success in preparing students for admission to the State's public university systems because districts' current method for reporting their outcomes related to college preparatory coursework activities is inadequate. State law requires districts to include specific metrics in their local control and accountability plans (accountability plans), such as college preparatory coursework completion rates (completion rates), to measure student achievement. However, the accountability plans for the three districts we reviewed were inaccurate, uninformative, and did not aid in our understanding of whether the districts met their goals of improved college readiness. Further, the districts reported outdated completion rates that did not measure the effectiveness of their recent actions, making it difficult to determine whether the actions they took in any given year had a direct effect upon their completion rates.

### **Education and County Offices Have Provided Little Oversight Related to College Preparatory Coursework**

Under current law, no single state or local entity is specifically responsible for overseeing whether districts provide sufficient access to college preparatory coursework and adequately assist their students in completing that coursework. Many entities play a role in college preparatory coursework and accountability plans. However, of these entities, Education and county offices are best positioned to provide guidance and oversight to districts to improve college readiness—we recommend specific additional responsibilities for these entities in Figure 13. As of December 2016, neither of these entities had verified that high schools throughout the State provide students with sufficient access to college preparatory coursework. The lack of such an analysis demonstrates the need for additional oversight. Although entities such as the State Board of Education (State Board), the California Collaborative for Educational Excellence (Educational Collaborative), and the University of California (UC) play important roles in college preparedness, they have no oversight responsibilities.

#### ***Education Provides Minimal Assistance to Districts to Ensure That Students Have Access to College Preparatory Coursework***

*State law places few specific requirements on Education related to college preparatory coursework.*

State law places few specific requirements on Education related to college preparatory coursework. For example, state law requires the superintendent, who heads Education, to assist districts in ensuring that all public high school students have access to a core curriculum that meets the admission requirements of UC and the California State University. In addition, state law requires the superintendent to advise districts that maintain high schools about the importance of making readily available to each high school student the current list of courses offered by the student's high school that are certified by UC as meeting admissions requirements.

Although Education asserts it has partnered with and supports a number of organizations that promote college readiness, it could only provide one instance in the three years from 2013 through 2016 in which it or the superintendent provided guidance or assistance to districts regarding college preparatory coursework. Specifically, in September 2016, after we began our audit, Education distributed a letter to county offices, school districts, charter schools, and high school principals to provide information and resources about Advanced Placement (AP) and other rigorous course options. Attached to the letter was a three-page list that included 19 websites offering information about these course options. Education's letter specified that it provided these resources only as a convenience, and that their inclusion did not imply its endorsement. Among these websites, the letter referred districts to the UC's college preparatory course website.

**Figure 13**

**Recommendations for Improving State and Local Responsibilities Related to College Preparatory Coursework**

		CALIFORNIA DEPARTMENT OF EDUCATION (EDUCATION)	STATE BOARD OF EDUCATION (STATE BOARD)	UNIVERSITY OF CALIFORNIA (UC)
STATE	Current	<ul style="list-style-type: none"> <li>• Administers state and federal education programs.</li> <li>• Disseminates information.</li> <li>• Collects data from the districts.</li> <li>• Publishes official data.</li> </ul>	<ul style="list-style-type: none"> <li>• Policy-making body for Education.</li> <li>• Adopts evaluation rubrics to measure district performance.</li> </ul>	<ul style="list-style-type: none"> <li>• Decides the coursework that applicants need for admission.</li> <li>• Reviews and approves college preparatory coursework submitted by schools.</li> <li>• Maintains a list of approved courses for each high school on its website.</li> </ul>
	California State Auditor's Recommendations	<ul style="list-style-type: none"> <li>• Would provide training and guidance to districts on the creation and application of appropriate district- and school-level access analyses.</li> <li>• Would issue an annual report to the Legislature detailing all districts with high schools that have failed to demonstrate sufficient access.</li> <li>• Education (or other state-level entity) would coordinate statewide college readiness efforts to increase college preparatory completion rates throughout the State.</li> </ul>		
		COUNTY OFFICES OF EDUCATION	SCHOOL DISTRICTS	
LOCAL	Current	<ul style="list-style-type: none"> <li>• Offers assistance to districts through <i>ad hoc</i> contracts.</li> <li>• Approves local control and accountability plans (accountability plans).</li> </ul>	<ul style="list-style-type: none"> <li>• Establishes graduation requirements above the state minimum.</li> <li>• Self-reports student data.</li> <li>• Submits college preparatory courses to the UC for approval.</li> <li>• Adopts accountability plan annually.</li> <li>• Offers to all otherwise qualified students a course of study fulfilling the requirements for admission to UC and the California State University and provides a timely opportunity to each of those students to enroll within a four-year period in each course necessary to fulfill those requirements prior to graduation from high school.</li> </ul>	
	California State Auditor's Recommendations	<ul style="list-style-type: none"> <li>• Would monitor districts to determine whether they offer students adequate access to college preparatory courses.</li> <li>• Would review districts' accountability plans and monitor the actions the districts take to implement the goals in those plans.</li> </ul>	<ul style="list-style-type: none"> <li>• Would determine if all its high school students receive acceptable levels of access to the full range of college preparatory courses and submit that data to Education and its respective county office of education.</li> <li>• Would have an on track/off track model that allows it to determine whether students are completing grade-level appropriate college preparatory coursework. It would notify parents when it identifies students as falling off track and advise parents and students of available credit recovery and support options available. School staff would meet with these students and document the support they provide to students.</li> <li>• Would have a robust and stable network of credit recovery options, monitor their effectiveness, and provide appropriate support offerings.</li> <li>• Would have a centralized process for submitting, managing, and tracking college preparatory courses and certification requests.</li> </ul>	

Sources: State law and information available from Education, State Board, UC, county offices of education, and school districts.

We do not believe that one letter about AP courses with an attached list of web addresses constitutes adequate assistance to districts to ensure they provide sufficient access to college preparatory courses, especially given that—as we discuss in Chapter 1—each of the three districts we reviewed lacked data and processes to ensure they offered enough college preparatory courses. For Education to fulfill its statutory responsibility to assist districts, we believe it should develop recommended methods that districts could use to track the college preparatory courses they offer and to ensure they offer enough of these courses. These methods and processes could mirror those that we used when analyzing access at the three districts we reviewed.

According to Education’s administrator of the college preparation and postsecondary programs office (administrator), Education does not offer formal assistance to districts related to access to college preparatory coursework; instead, it directs the districts to UC. The administrator stated that Education could have a role in assessing the sufficiency of the access that districts provide; however, he explained that Education currently has no guidelines and no resources associated with this issue. Education is aware of some high schools that offer limited rigorous courses. For instance, in the September 2016 letter that the superintendent sent to the districts, Education recognized that 40 percent of high schools (515 of 1,302) offered AP courses in fewer than five subjects in 2014–15. However, the administrator believes that the state law is not clear about Education’s role in addressing this problem, in part because state law does not specify what the word *assist* means or entails.

***Although the districts are responsible for ensuring they provide sufficient access for all their students, Education should assist them in meeting this responsibility.***

Nonetheless, we expect Education—charged with oversight responsibility for California’s kindergarten through grade 12 public education—to have the expertise necessary to define what *assisting districts* means. Although the districts are ultimately responsible for ensuring they provide sufficient access for all their students, Education should—as state law requires—assist them in meeting this responsibility.

***Although County Offices Are Not Specifically Responsible for Overseeing Access to College Preparatory Coursework, They Could Fulfill This Oversight Function***

Although school districts, rather than county offices, are required by state law to ensure students’ access to college preparatory coursework, county offices are positioned well to assist with this responsibility because of the oversight functions they already perform. For example, state law requires county office superintendents to examine and approve district budgets. In addition, under state law, county offices are responsible for monitoring districts for sufficient textbooks, the condition of their

facilities, and their teacher misassignments and vacancies. Further, county offices can help districts formulate new curricula and enter into agreements with them to provide training programs.

The county offices we spoke to seem willing to assume additional responsibilities related to overseeing course access. In fact, as we discuss in Chapter 1, one county office already provides services related to college preparatory coursework completion through contracts it entered into with an individual district. Specifically, Coachella Valley Unified School District (Coachella) entered into a contract with Riverside County Office of Education (Riverside County) to provide training to district and school personnel on implementing a systematic approach to college preparatory course management and transcript evaluation. The executive director of instructional services for Riverside County stated that county offices statewide could assist districts by advising them on how to verify the sufficiency of their college preparatory courses. Further, the assistant superintendent of educational services from the San Joaquin County Office of Education, of which Stockton Unified School District (Stockton) is a part, stated that county offices could offer in-person visits to verify sufficient access to college preparatory coursework.

However, to provide specialized oversight and guidance to districts, county offices would need to obtain not just the legal ability to oversee districts but also the funding necessary to support these efforts. For example, Riverside County is currently able to provide services to Coachella only because of the funding it receives from the district as a result of the contract. Similarly, the assistant superintendent of educational services from the San Joaquin County Office of Education stated that if funding existed to support these efforts, county offices could offer help to districts regarding college preparatory coursework through in-person visits to verify access to those courses.

***State Law Does Not Require the State Board or the Educational Collaborative to Assess Whether Districts Give Students the Opportunity to Enroll in College Preparatory Courses***

Although state law assigns the State Board the responsibility to adopt rules and regulations to govern kindergarten through grade 12 schools, it does not clearly assign it direct responsibility regarding college preparatory coursework. The State Board is responsible for approving academic content standards, for adopting statewide assessments and curriculum frameworks, and for establishing rules and regulations for the allocation of federal funds to districts. However, according to the State Board's chief counsel, the State Board has no role related to the provision of

***The county offices we spoke to seem willing to assume additional responsibilities related to overseeing course access.***

college preparatory coursework nor is it responsible for providing direct assistance to districts to ensure students have access to college preparatory courses. Thus, the State Board would not be in a position to provide districts with specific guidance on standards or mechanisms to ensure that students have sufficient access to college preparatory coursework.

The Educational Collaborative is a public agency the Legislature created in conjunction with its adoption of the local control funding formula (funding formula) in 2013. The Educational Collaborative's purpose is to advise and assist districts, county superintendents of schools, and charter schools in achieving the goals they establish in their accountability plans. According to the Educational Collaborative's director of training and outreach, the agency is in the pilot stage and thus had not fully implemented services statewide as of December 2016. He stated that the Educational Collaborative has not established a particular date by which the pilot stage will end and that it could continue until 2018–19. The director of training and outreach asserted that the Educational Collaborative could participate in the districts' college readiness efforts by providing trainings and surveys during annual workshops and by creating professional learning community networks in which districts could obtain peer-to-peer help. However, he also explained that he is not aware of district demand for assistance related to college preparatory coursework issues or college readiness.

### **UC Has Substantially Increased the Rate at Which It Approves Courses**

As discussed in the Introduction, UC is responsible for certifying courses as college preparatory. In the four years from 2012–13 through 2015–16, UC has improved its process of approving college preparatory courses and has increased the percentage of new courses it approved from 57 percent in 2012–13 to 90 percent in 2015–16. During that same period, UC also substantially lowered the average time it took to issue certification decisions from 50 days to 14 days. In addition, in 2015 UC changed the format for course submissions and, according to UC's associate director for undergraduate admissions, the new format reduced the length of most course proposals it receives from 10 to 25 pages to about five pages. We asked 11 districts whether they had any trouble getting courses approved: nine districts reported no problems and two experienced minor issues that were not related to UC's performance in approving courses.

*Nine districts reported no problem in getting courses approved and two experienced minor issues that were not related to UC's performance in approving courses.*

UC also provided outreach to districts and schools during 2012–13 through 2014–15. State law requests, but does not require, UC to assist each district that maintains a high school in order to ensure that school administrators and educators understand how to

submit courses for approval, have processes for developing and submitting courses, and maintain accurate lists of courses. To meet that request, UC maintains a website that provides guidance on submitting courses for approval and annually updating course lists. Further, to help districts keep accurate course lists across their multiple high schools, the associate director of undergraduate admissions indicates that UC will further enhance its web portal in February 2017, allowing districts to consolidate courses taught at different high schools into one version of that course. UC also holds a variety of events each year that provide guidance on college preparatory coursework requirements and the course submission process. The associate director of undergraduate admissions confirmed that UC will continue to offer this guidance in the future.

### **The Accountability Plans Make It Difficult for Communities to Assess Districts' Progress Toward Improved College Preparedness**

When it adopted the new funding formula in 2013, the State created a process for monitoring the performance of local educational agencies, including districts, through two key oversight elements. The first element is the three-year accountability plans that districts must complete and update annually. In addition to objectives and strategies, the accountability plans must list specific actions the districts intend to take to achieve those objectives. Further, state law requires the districts' accountability plans to use certain metrics—such as college preparatory completion rates—to measure the students' achievements. As the text box describes, county offices must approve the districts' accountability plan. The second oversight element state law requires is an evaluation tool that the State Board approved in 2016 that will assist districts in evaluating their strengths, weaknesses, and areas that require improvement. The evaluation tool will also help identify districts in need of technical assistance or intervention.

#### **The accountability plan process requires each school district to do the following:**

- Consult with teachers, parents, students, and other stakeholders.
- Develop and adopt the accountability plan.
- File the plan with their respective county superintendents for approval.
- Update the plan each year, which includes reviewing the progress toward meeting its goals and assessing the effectiveness of the specific actions used to achieve those goals.

Source: California State Auditor's review of information obtained from state law.

The college readiness portions of the accountability plans for the three districts we reviewed were inaccurate and uninformative. Further, the three accountability plans were not useful in determining whether the districts had increased students' completion rates or whether the steps they had taken to improve college readiness had positive effects.

***The Accountability Plans We Reviewed Contained Numerous Errors and Could Not Be Used to Assess Completion Rates***

When reviewing accountability plans, we found that districts reported incorrect data or data that were not useful in determining whether the districts met their completion rate goals. For example, Stockton reported a completion rate of 9.9 percent in its 2014–15 accountability plan—a 10 percent drop from its 2011–12 baseline. However, Stockton acknowledged to us that this completion rate was incorrect and was the result of an internal data processing error; in fact, its actual completion rate was closer to 20 percent. Moreover, Stockton included conflicting information in three different sections of its 2014–15 accountability plan update: its metric results showed that it was not meeting its targeted completion rate of 24.8 percent; it stated elsewhere in the plan that it had successfully met its goal of ensuring that every student would graduate ready for college or a career; and it stated in yet another section of the plan that it was too early to determine if its actions related to college preparatory coursework had been effective. Stockton also admitted in the same document that its accountability plan included circular references and included extremely vague descriptions of its planned actions.

***The accountability plans we reviewed were inaccurate and vague, making it difficult for a reader to determine what, if any, progress the districts had made in increasing students' completion rates.***

The accountability plans for the other two districts also were inaccurate and vague, making it difficult for a reader to determine what, if any, progress they had made in increasing students' completion rates. Coachella reported a completion rate of 27.5 percent—0.5 percent less than its goal—yet also reported that it met or exceeded its planned outcome. In San Francisco Unified School District's 2015–16 accountability plan, it stated that it planned to increase its previous year's completion rate by 1 percent, but it did not include the previous year's completion rate in the accountability plan. Coachella and San Francisco had various perspectives regarding the issues we identified with the accountability plans, including difficulty in identifying which resources the district used on specific actions and problems with establishing realistic targets and metrics. Because of staff turnover, Stockton did not know the basis for staff decisions related to accountability plans.

In many instances, we could not find a clear link between the college readiness goals Stockton and Coachella articulated in their accountability plans and the actions included in the plans they intended to take to achieve those goals. State law requires districts to describe in their accountability plans the specific actions they will perform during each year to achieve their stated goals. However, many of the 17 actions and services Stockton attached to its college and career readiness goal in its 2014–15 accountability plan did not directly relate to either college or career readiness. These actions included increasing anti-bullying efforts and adding

district behavioral support staff. Moreover, combining college readiness goals with other goals makes it difficult to assess what activities will implement each element of the goal. For example, in its 2014–15 accountability plan, Coachella stated that its goal was to “increase student achievement and other pupil outcomes to prepare all students for college, career, and citizenship in the 21<sup>st</sup> century.” One of the related activities was purchasing equipment for its kindergarten through grade eight physical education program. When districts use overly broad goals or include activities unrelated or only marginally related to their goals, they impede the ability of stakeholders to determine which actions affect their completion rates.

County offices could provide districts with additional guidance and oversight to make their districts’ accountability plans more effective, but a statutory change might be necessary to give the county offices increased authority. State law currently requires county offices to ensure that the districts’ accountability plans adhere to the template, that their budgets include sufficient funds to implement the actions and strategies in their plans, and that the plans identify the expenditures for *unduplicated students*—English learners, students who are classified as eligible for free or reduced price meals, or students in foster care. However, state law does not require county offices to evaluate the content of districts’ accountability plans to ensure they are accurate or useful, nor does it require the districts to implement county offices’ suggested changes.

One county office we visited has taken an active role in assisting one of its districts in completing the accountability plan template and reviewing the content of its plan. Specifically, Riverside County performed a comprehensive assessment of Coachella’s 2015–16 and 2016–17 accountability plans and made suggestions for improvement. For example, Riverside County recommended Coachella consider including completion rate targets for unduplicated students and include appropriate actions to close those achievement gaps. In its 2016–17 accountability plan, Coachella implemented the recommendation and included separate targets and actions for unduplicated students.

Conversely, the assistant superintendent of educational services of the San Joaquin County Office of Education explained that the county office helps districts focus on the eight state priorities outlined in state law but does not assist in setting districts’ goals, creating any other content related to the accountability plan, or overseeing the quality of the district’s accountability plans.

***One county office we visited has taken an active role in assisting one of its districts in completing the accountability plan template and reviewing the content of its plan.***

***The Districts We Reviewed Reported Outdated Completion Rates That Did Not Measure the Effectiveness of Their Actions***

The districts we reviewed reported completion rates in their accountability plans that were from prior years and thus did not correspond with the activities and services the districts had implemented to improve students' college preparedness. For example, the three districts we reviewed developed their 2014–15 accountability plans using either 2011–12 or 2012–13 completion rates or did not include a baseline year. In the updates to the 2014–15 plans, they reported 2013–14 completion rates when attempting to measure whether they had met the stated goals of their 2014–15 accountability plans. However, because the activities the districts reported performing in the 2014–15 accountability plan took place after 2013–14, we cannot attribute those activities performed to an increase or decrease in their completion rates. To gauge the effectiveness of activities meant to increase college preparedness, districts should use the outcome data that corresponds with the time the activities took place.

The districts use prior years' data because Education provides the districts with the annual college preparatory completion data nearly a year after the end of the school year. Each year, districts submit data between October and December, including college preparatory completion data from the prior school year. The administrator of Education's data reporting office stated that Education begins compiling the data in late January or early February and that the process typically takes a minimum of two to three months. Further, the timing is highly dependent on other competing priorities. Education typically publishes the information for use by the districts in April. State law requires the districts to issue their accountability plans to county offices for approval no later than July 1, which means that districts have a maximum of two months to amend their plans with the new information and submit the revised documents to stakeholders. For instance, Coachella's director of state and federal projects said that Coachella's district board approved the accountability plan in June and sent it for approval to the county office in July. Further emphasizing the districts' time constraints, San Francisco's executive director of budget services asserted that stakeholder engagement begins earlier and earlier each year. Thus, districts are using outdated completion rates because of the short window between when Education issues graduation data and the districts' boards adopt their accountability plans.

***Districts are using outdated completion rates because of the short window between when Education issues graduation data and the districts' boards adopt their accountability plans.***

The State Board has revised the 2017–18 accountability plan template, which will partially alleviate the difficulty of evaluating the effectiveness of the district's actions. The State Board modified the accountability plan template to include the goals, activities, and outcomes that span a three-year window. The modified template will partially

address the issue of outdated metrics by including at least one year of completion rates that pertain to the actions taken in the corresponding time period.

### **Recommendations**

To increase college preparatory completion rates, the Legislature should require Education or another state entity to coordinate statewide college readiness efforts focusing on increasing college preparatory completion rates.

To comply with existing law and ensure that students receive sufficient access to college preparatory coursework, Education should provide training and guidance to districts throughout the State on the creation and application of appropriate district- and school-level access analyses.

To ensure that high school graduates are eligible for admission to the State's public university systems, the Legislature should require county offices to monitor districts to determine whether they offer students adequate access to college preparatory coursework.

To ensure districts' accountability plans are accurate and informative, the Legislature should require county offices to review districts' accountability plans and monitor the actions the districts take to implement the goals in those plans.

We conducted this audit under the authority vested in the California State Auditor by Section 8543 et seq. of the California Government Code and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives specified in the Scope and Methodology section of the report. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Respectfully submitted,



ELAINE M. HOWLE, CPA  
State Auditor

Date: February 28, 2017

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For questions regarding the contents of this report, please contact Margarita Fernández, Chief of Public Affairs, at 916.445.0255.

## Appendix A

### OUR ANALYSIS OF STUDENT ACCESS TO COLLEGE PREPARATORY COURSEWORK

Table A, beginning on the following page, summarizes the results of our analysis of college preparatory coursework access. We reviewed schedules of courses offered at two high schools in each of the three school districts we visited and compared the courses offered to the schools' enrollments. Although there were significant limitations to the data, when such data was available, our analysis suggests that the schools provided students with sufficient access to college preparatory coursework. Each school we reviewed did not meet the minimum access requirements in every category for every year; however, the deficiencies we noted were unlikely to have affected students' opportunities to complete all of the college preparatory coursework requirements.

**Table A**  
**Access to College Preparatory Coursework at the Six High Schools We Reviewed**

HIGH SCHOOL / COLLEGE PREPARATORY COURSEWORK REQUIREMENTS	PERCENTAGE OF STUDENTS WHO HAD COLLEGE PREPARATORY COURSEWORK ACCESS PER ACADEMIC YEAR				TARGET ACCESS PERCENTAGE NECESSARY FOR STUDENTS TO MEET REQUIREMENT OVER A FOUR-YEAR PERIOD
	2011-12	2012-13	2013-14	2014-15	
<b>Coachella Valley Unified School District</b>					
<b>Coachella Valley High School</b> Based on trimester schedule					
(a) History—2 years	73%	*	*	*	50%
(b) English—4 years	169	*	*	*	100
(c) Mathematics—3 years	109	*	*	*	75
(d) Laboratory Science—2 years	62	*	*	*	50
(e) Foreign Language—2 years	37 <sup>†</sup>	*	*	*	50
(f) Visual and Performing Arts—1 year	36	*	*	*	25
(g) College Preparatory Elective—1 year	32	*	*	*	25 or excess capacity in other subcategory
<b>Desert Mirage High School</b> Based on semester schedule					
(a) History—2 years	*	*	*	54%	50%
(b) English—4 years	*	*	*	119	100
(c) Mathematics—3 years	*	*	*	92	75
(d) Laboratory Science—2 years	*	*	*	48 <sup>‡</sup>	50
(e) Foreign Language—2 years	*	*	*	33 <sup>†</sup>	50
(f) Visual and Performing Arts—1 year	*	*	*	40	25
(g) College Preparatory Elective—1 year	*	*	*	8 <sup>§</sup>	25 or excess capacity in other subcategory
<b>San Francisco Unified School District</b>					
<b>Mission High School</b> Based on semester schedule					
(a) History—2 years	^	^	80%	95%	50%
(b) English—4 years	^	^	125	147	100
(c) Mathematics—3 years	^	^	116	130	75
(d) Laboratory Science—2 years	^	^	109	109	50
(e) Foreign Language—2 years	^	^	56	58	50
(f) Visual and Performing Arts—1 year	^	^	50	59	25
(g) College Preparatory Elective—1 year	^	^	16 <sup>§</sup>	36	25 or excess capacity in other subcategory
<b>Washington High School</b> Based on semester schedule					
(a) History—2 years	^	^	83%	61%	50%
(b) English—4 years	^	^	128	113	100
(c) Mathematics—3 years	^	^	119	122	75
(d) Laboratory Science—2 years	^	^	107	108	50
(e) Foreign Language—2 years	^	^	70	71	50
(f) Visual and Performing Arts—1 year	^	^	51	53	25
(g) College Preparatory Elective—1 year	^	^	23 <sup>§</sup>	27	25 or excess capacity in other subcategory

HIGH SCHOOL / COLLEGE PREPARATORY COURSEWORK REQUIREMENTS	PERCENTAGE OF STUDENTS WHO HAD COLLEGE PREPARATORY COURSEWORK ACCESS PER ACADEMIC YEAR				TARGET ACCESS PERCENTAGE NECESSARY FOR STUDENTS TO MEET REQUIREMENT OVER A FOUR-YEAR PERIOD
	2011-12	2012-13	2013-14	2014-15	
<b>Stockton Unified School District</b>					
<b>Edison High School</b>	Based on block schedule				
(a) History—2 years	75%	80%	68%	67%	25%
(b) English—4 years	110	111	111	102	50
(c) Mathematics—3 years	101	97	92	90	37.5
(d) Laboratory Science—2 years	48	72	60	57	25
(e) Foreign Language—2 years	64	57	56	63	25
(f) Visual and Performing Arts—1 year	54	52	54	51	12.5
(g) College Preparatory Elective—1 year	25	31	23	5 <sup>§</sup>	12.5 or excess capacity in other subcategory
<b>Franklin High School</b>	Based on semester schedule				
(a) History—2 years	68%	66%	79%	57%	50%
(b) English—4 years	100	94 <sup>#</sup>	101	92 <sup>**</sup>	100
(c) Mathematics—3 years	86	85	98	94	75
(d) Laboratory Science—2 years	52	60	64	65	50
(e) Foreign Language—2 years	48 <sup>††</sup>	45 <sup>††</sup>	47 <sup>††</sup>	56	50
(f) Visual and Performing Arts—1 year	42	39	33	30	25
(g) College Preparatory Elective—1 year	18 <sup>§</sup>	12 <sup>§</sup>	35	18 <sup>§</sup>	25 or excess capacity in other subcategory

Source: California State Auditor’s analysis of course schedule and enrollment data from Coachella Valley, San Francisco, and Stockton Unified School Districts.

Note: Target percentages vary based on school schedule type. For example, the (a) category requires two years of various combinations of history courses. For a school based on a semester schedule to provide 100 percent access in the (a) category, it would need to ensure that adequate seats existed for 50 percent of the students to take an (a) course in any given year. This would allow half the students to complete 10 credits in a given year, thereby allowing the potential for all students to satisfy the 20-credit or two-year requirement within four years. However, other schedule types, such as Edison High School’s four-period block schedule, allowed students to take 10 credits in a given course in the span of time it would usually take a student to receive five credits in a traditional semester schedule. This ability to take more credits across fewer periods changes the yearly target percentage.

\* We did not conduct an analysis related to Coachella Valley High School in 2012 through 2015 and Desert Mirage High School in 2011 through 2014 due to district business practices, which resulted in courses being labeled as inactive. These business practices prevented us from determining whether courses listed in the district’s database reflected courses that were actually taught or merely courses that were planned but not taught.

† Although Coachella Valley High School and Desert Mirage High School are below the target percentage in their respective foreign language levels, the enrolled population is primarily composed of native Spanish speakers who would likely qualify to take higher-level foreign language courses. UC and CSU policy allows for validations based on higher-level foreign language courses, thus satisfying the requirement.

‡ Although laboratory science is deficient by 2 percent, the effect would be limited to a potential of approximately 40 students and could have been resolved by excess capacity in other years.

§ A lack of capacity in the (g) category can be made up by using excess capacity in any other subcategory. Sufficient additional capacity existed within other college preparatory subcategories.

^ We did not conduct an analysis for San Francisco Unified School District related to 2011-12 and 2012-13 due to data limitations that prevented us from determining course length and maximum credits.

# Franklin High School had sufficient capacity in college preparatory English when we adjusted for students enrolled in English resource courses.

\*\* Although Franklin High School appears deficient in 2014-15, students were actually enrolled in grade-level appropriate courses that provided access, although this action required the school to enroll students past the maximum capacity of the individual sections.

†† In 2011-12, 2012-13, and 2013-14, this potential deficiency was caused by uncertified courses misidentified by the district as certified by UC. The UC and CSU allow higher-level foreign language courses to validate lower-level requirements. Higher-level foreign language courses in the prior year would have satisfied the access requirement for students enrolled in the affected classes.

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## Appendix B

### STUDENT DEMOGRAPHICS OF THREE SELECTED DISTRICTS AND COMPLETION RATES BY ENGLISH LEARNER STATUS

We were asked to provide the number of students enrolled by race for each of the three districts we selected for review and the average completion rate by English learner status, among other things.

Table B.1 on the following page summarizes student demographics in our three selected districts from our three cohorts in graduation years 2013 through 2015. As we indicated in Chapter 1, Chicano/Latino students averaged 96 percent of the student population in Coachella Valley Unified School District.

Table B.2 on page 61 summarizes completion rates by English learner status in our three selected districts from our three cohorts that completed high school from 2013 through 2015. This analysis shows, for example, that the percentage of English learners in Stockton Unified School District who completed college preparatory coursework ranged from 4 percent to 9 percent.

**Table B.1**  
Enrollment in Cohorts for Graduation Years 2013 Through 2015

ETHNICITY/RACE	STUDENT ENROLLMENT BY GRADUATION YEAR											
	2013				2014				2015			
	GENDER		TOTALS		GENDER		TOTALS		GENDER		TOTALS	
	FEMALE	MALE	NUMBER	PERCENTAGE	FEMALE	MALE	NUMBER	PERCENTAGE	FEMALE	MALE	NUMBER	PERCENTAGE
<b>Coachella Valley Unified School District</b>												
American Indian	*	*	*	*	*	*	*	*	*	*	*	*
Asian	*	*	*	*	*	*	*	*	*	*	*	*
Black/African American	*	*	*	*	*	*	*	*	*	*	*	*
Chicano/Latino	593	652	1,245	96%	605	649	1,254	97%	540	663	1,203	97%
Not specified	*	*	*	*	*	*	*	*	*	*	*	*
Pacific Islander	0	0	0	0	0	0	0	0	0	0	0	0
Two or more races	*	*	*	*	*	*	*	*	*	*	*	*
White	19	16	35	3	*	*	*	*	*	*	*	*
<b>Totals</b>	*	*	*	<b>100%</b>	*	*	*	<b>100%</b>	*	*	*	<b>100%</b>
<b>San Francisco Unified School District</b>												
American Indian	*	*	*	*	*	*	*	*	*	*	*	*
Asian	1,016	1,046	2,062	54	1,061	1,138	2,199	58	973	1,108	2,081	56
Black/African American	196	193	389	10	169	170	339	9	151	165	316	8
Chicano/Latino	380	406	786	21	372	397	769	20	379	421	800	22
Not specified	85	92	177	5	60	53	113	3	62	49	111	3
Pacific Islander	25	30	55	1	22	16	38	1	29	22	51	1
Two or more races	23	24	47	1	27	22	49	1	35	26	61	2
White	154	149	303	8	141	157	298	8	146	146	292	8
<b>Totals</b>	*	*	*	<b>100%</b>	*	*	*	<b>100%</b>	*	*	*	<b>100%</b>
<b>Stockton Unified School District</b>												
American Indian	62	73	135	6%	69	66	135	6%	49	43	92	4%
Asian	209	236	445	18	201	211	412	17	199	212	411	16
Black/African American	157	152	309	12	138	154	292	12	147	157	304	12
Chicano/Latino	692	693	1,385	55	683	658	1,341	56	761	781	1,542	60
Not specified	*	*	*	*	0	0	0	0	0	0	0	0
Pacific Islander	*	*	*	*	*	*	*	*	*	*	*	*
Two or more races	*	*	*	*	*	*	*	*	11	12	23	1
White	109	121	230	9	91	112	203	9	100	89	189	7
<b>Totals</b>	*	*	*	<b>100%</b>	*	*	*	<b>100%</b>	*	*	*	<b>100%</b>

Source: California State Auditor's analysis of student data provided by Coachella Valley, San Francisco, and Stockton Unified School Districts.

\* To protect individual privacy, we omitted this number because it would identify 10 or fewer students. Such omission is in accordance with aggregate data reporting guidelines issued by the California and United States Department of Education.

**Table B.2**  
**College Preparatory Coursework Completion by English Learner Status**

ENGLISH LEARNER STATUS	COLLEGE PREPARATORY COURSEWORK COMPLETION BY GRADUATION YEAR		
	2013	2014	2015
<b>Coachella Valley Unified School District</b>			
English learner	11%	12%	13%
Reclassified as fluent	43	51	48
Initially fluent/English native	22	28	30
<b>San Francisco Unified School District</b>			
English learner	39%	41%	51%
Reclassified as fluent	74	77	78
Initially fluent/English native	60	63	71
<b>Stockton Unified School District</b>			
English learner	4%	6%	9%
Reclassified as fluent	27	29	26
Initially fluent/English native	20	22	21

Source: California State Auditor's analysis of student data provided by Coachella Valley, San Francisco, and Stockton Unified School Districts.

Note: We excluded students who left the district.

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CALIFORNIA  
DEPARTMENT OF  
EDUCATION

**TOM TORLAKSON**  
STATE SUPERINTENDENT OF PUBLIC INSTRUCTION

February 13, 2017

Elaine M. Howle, State Auditor\*  
California State Auditor  
621 Capitol Mall, Suite 1200  
Sacramento, CA 95814

Subject: *"College Readiness of California High School Students – By Adopting New Strategies and Increasing Oversight, California Can Better Prepare Its Students for College,"* Report No. 2016-114, February 2017

The California Department of Education (Education) appreciates the opportunity to comment on the recommendation outlined in the California State Auditor's (CSA) Audit Report No. 2016-114, titled: *"College Readiness of California High School Students – By Adopting New Strategies and Increasing Oversight, California Can Better Prepare Its Students for College."*

**Recommendation No. 1:**

To comply with existing law and ensure that students receive sufficient access to college preparatory coursework, Education should provide training and guidance to districts throughout the State on the creation and application of appropriate district and school-level access analyses.

Education's Comments

Education does not concur. The CSA's recommendation is inconsistent with the framework established by the Legislature's adoption of the Local Control Funding Formula (LCFF) in 2013. The LCFF focuses on local assessment of need and local decision-making to address those needs around eight state priorities, including student achievement as measured by college readiness indicators and access to a broad course of study. As part of the LCFF, school districts, county offices of education and charter schools are required to develop, adopt, and annually update a three-year Local Control and Accountability Plan using a template adopted by the California State Board of Education.

①

\* California State Auditor's comments begin on page 65.

Elaine M. Howle, State Auditor  
February 13, 2017  
Page 2

Education is in compliance with *California Education Code* Section 66204(a), which directs the State Superintendent of Public Instruction to:

- (1) assist all school districts to ensure that all public high school pupils have access to a core curriculum that meets the admission requirements of the University of California and the California State University;
- (2) advise school districts that maintain high schools about the importance of making readily available to each high school pupil the current list of courses offered by the school attended by that pupil that are certified by the University of California as meeting admissions requirements.

- ② The auditors subjectively report that, "Education currently provides only minimal assistance to districts..." However, on the contrary, Education provided the auditors with evidence demonstrating substantial guidance and assistance to districts over a multi-year period, including the period covered in the audit. This evidence included a letter dated September 1, 2016, to local educational agencies (LEAs) concerning the \$200 million College Readiness Block Grant (see <http://www.cde.ca.gov/ci/gs/ps/crbgsspi.asp>); a college readiness Web page (see <http://www.cde.ca.gov/ci/gs/ps/collegereadiness.asp>); and curriculum framework guidance on developing secondary courses. In addition, Education has program staff assigned to provide districts with ongoing technical assistance and guidance related to a variety of college preparatory course topics.
- ③
- ④ Education also provided LEAs with significant information regarding the state's assessment system (California Assessment for Student Performance and Progress), which focuses on measuring student's preparedness for college and career. This assessment system includes a measurement of grade eleven students' readiness for access to the California State University and California Community College systems, known as the Early Assessment Program.

Furthermore, during the audit period from 2013 to 2016, Education implemented, on a statewide basis, an unprecedented \$1.6 billion investment in expanding student access to career and college opportunities in the form of the California Career Pathways Trust, the Career Technical Education Incentive Grant, and the College Readiness Block Grant. As part of implementing these three legislatively authorized initiatives, Education provided districts with ongoing technical assistance and guidance as well as professional development and other informational resources.

The auditors also report that, "Education is aware of some instances of high schools offering limited rigorous courses," citing as evidence the State Superintendent's letter to LEAs dated September 26, 2016, <http://www.cde.ca.gov/nr/el/le/yr16ltr0926.asp>, indicating that 40 percent of high

Elaine M. Howle, State Auditor  
February 13, 2017  
Page 3

schools offered Advanced Placement (AP) courses in fewer than five subject areas in academic year 2014–15. Education notes that this letter also provided 19 resources to help districts increase their offerings, and included the option for districts to contact Education directly for support. ⑤

Going forward, Education will continue to provide assistance to districts as required by *Education Code* Section 66204(a). For example, the new State Accountability and Continuous Improvement System, which was being developed during the audit period, includes the State Board of Education's adoption of a College and Career Indicator.

If you have any questions regarding Education's comments or corrective actions, please contact Kevin W. Chan, Director, Audits and Investigations Division, by e-mail at [kchan@cde.ca.gov](mailto:kchan@cde.ca.gov).

Sincerely,



Michelle Zumot  
Chief Deputy Superintendent of Public Instruction

MZ:kl

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## Comments

### CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM THE CALIFORNIA DEPARTMENT OF EDUCATION

To provide clarity and perspective, we are commenting on the response to our audit report from the California Department of Education (Education). The numbers below correspond with the numbers we have placed in the margin of Education's response.

Education misunderstands our recommendation. As Education acknowledges, the superintendent of public instruction has a specified duty in assisting school districts in ensuring that all public high school pupils have access to college preparatory coursework. Moreover, as we describe on page 47, as part of the change to school funding framework established by the local control funding formula (funding formula), local educational agencies (LEAs) must complete and update annually Local Control and Accountability Plans (accountability plans). These accountability plans must include specific information regarding student achievement as measured by the rate of college preparatory coursework completion, among other metrics, as we state on the same page. However, there is nothing in state law or regulation relating to the funding formula that precludes Education from implementing our recommendation. Indeed, rather than being "inconsistent with the framework," we think our recommendation furthers the Legislature's intent in supporting this state priority.

①

Education has subjectively omitted the second portion of our statement. Specifically, on page 42, we state that Education provides minimal assistance to districts *to ensure that students have access to college preparatory coursework*. None of the examples that Education cites relate to ensuring that districts provide sufficient college preparatory coursework access.

②

On page 44 we note that Education's own administrator of the college preparation and postsecondary programs office acknowledged Education does not offer formal assistance to districts related to access to college preparatory coursework; instead, it directs the districts to contact the University of California. The administrator further stated that Education could have a role in assessing the sufficiency of the access that districts provide; however, he explained Education currently has no guidelines and no resources associated with this issue. Thus, even though Education indicates that it has staff assigned to provide districts with ongoing assistance, this assistance does not relate to college preparatory coursework access.

③

- ④ We fail to see the merit of Education's argument. The information provided to LEAs related to the California Assessment of Student Performance and Progress (CAASPP) does not relate to assisting districts to ensure they provide sufficient access to college preparatory coursework. According to Education's website, CAASPP identifies a student's ability to perform college-level work in English and mathematics. It is unclear how this examination or the resulting achievement level given to each student in these subject areas helps ensure that districts are providing access to college preparatory coursework needed to enter the State's public university systems.
- ⑤ As we state on page 42, Education specified in its September 26, 2016 letter that it provided these 19 websites only as a convenience, and that their inclusion did not imply its endorsement. We maintain that one letter, which Education sent after our audit began, about advanced placement courses with an attached list of web addresses does not constitute adequate assistance to districts to ensure they provide sufficient access to college preparatory courses, especially given that each of the three districts we reviewed lacked data and processes to demonstrate they offered enough college preparatory courses in each of the years we reviewed.

## EMAILED RESPONSE FROM COACHELLA VALLEY UNIFIED SCHOOL DISTRICT\*

*CVUSD has taken stringent measures in the past 3 years to address not only graduation, but A-G access to give rise to improving completion rates. Our graduation requirements, processes, and coursework has seen significant changes to grant our students with access and opportunities to establish A-G status. CVUSD does not have an access issue but does continue to work on academic achievement issues which are effecting students' success in A-G completion. The audit focused primarily on past practices before the aforementioned changes came to practice. CVUSD will continue to build personnel capacity and programs to help foster improvements in both student achievement and system processes in support of students.*

①

*Thank you.*

*Jason B. Angle, Ed.D.  
Assistant Superintendent  
Educational Services Division  
Coachella Valley Unified School District  
(760)848-1039  
Jason.Angle@cvusd.us*

\* California State Auditor's comment appears on page 69.

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## Comment

### **CALIFORNIA STATE AUDITOR'S COMMENT ON THE RESPONSE FROM THE COACHELLA VALLEY UNIFIED SCHOOL DISTRICT**

To provide clarity and perspective, we are commenting on the response to our audit report from Coachella Valley Unified School District (Coachella). The number below corresponds with the number we have placed in the margin of Coachella's response.

Although the audit found various issues with Coachella's past practices, our recommendations will help ensure ongoing success related to college preparatory coursework access and completion. We look forward to reviewing the evidence of the improvements that Coachella asserts it has made in its response.

①

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February 2017



**STOCKTON UNIFIED SCHOOL DISTRICT**  
CURRICULUM • PROFESSIONAL DEVELOPMENT  
1503 St. Mark's Plaza, Suite B, Stockton, California 95207  
Phone (209) 933-7030

February 15, 2017

TO: Ms. Elaine Howle  
California State Auditor

FROM: Robert Sahli  
Executive Director, Curriculum and Professional Development

SUBJECT: A-G Audit Response

Stockton Unified School District (SUSD) is continually working to improve services to students in all areas including access to and successful completion of A-G courses. SUSD has course offerings at all of its high schools that will provide a complete menu of courses necessary to qualify for UC/CSU admission provided the students successfully pass their courses in timelines established or commit to successful completion of credit recovery options.

SUSD's graduation requirements, at the minimum level, do not meet the requirements of A-G in the areas of Mathematics, World Language and Visual and Performing Arts. However, all students are encouraged to pursue meeting A-G. Since many students fall short in the areas listed above, the SUSD overall completion of A-G is negatively impacted. The graduation requirements do meet criteria for admission to community colleges and the majority of SUSD graduates who continue in an academic postsecondary pathway choose to attend the local college, Delta Community College. SUSD could choose to have graduation requirements mirror A-G requirements, but this would negatively impact graduation rates and those who do not choose to pursue a four year college pathway immediately after high school.

Over the course of the past five years, since implementation of a new Student Information System (Synergy), much work has been completed to correct errors in course codes, titles, and the related flagging of courses for A-G. During this timeframe, UCOP has also modified its processes from decentralized submission to centralized which will reduce errors. While there is a process in place at all schools for counselors to assist students in building their high school course pathways, SUSD is formulating a more formal process of documenting students' progress through their battery of courses to graduation. This process includes the creation of a new comprehensive counseling handbook and the use of an on-track to graduate software application. SUSD recently received a college and career block grant that will allow for hiring of a staff member to oversee district college and career efforts.

SUSD has undertaken several LCAP changes since the 2014-2015 LCAP plan year. In 2015, new staff was assigned specifically to the LCAP. There are issues with the LCAP system established by the State of California that SUSD must work under. Actions and services instituted through the LCAP cannot be fully measured for effectiveness until the students receiving the services graduate. Information to determine if an action or service is "effective" is dependent on last year's data for this year's activities and the determination of effectiveness is therefore skewed. SUSD is proactive in assessing previous

LCAPs to gain insight to better plan and implement services to ensure all students, including unduplicated populations, are receiving services to be college and career ready.

SUSD will continue to remove obstacles and improve opportunities for students as they negotiate a pathway to graduation and their choice of a college or career.

Cc: Eliseo Dávalos, Superintendent  
Tom Anderson, Assistant Superintendent