



TO: Chief Executive Officers
Chief Instructional Officers
Chief Student Services Officers
Chief Business Officers
Academic Senate Presidents

FROM: James E. Todd, Vice Chancellor of Academic Affairs
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RE: Associate degrees for Transfer (ADTs): Response to State Transfer Audit
Recommendation 13 and Ongoing ADT Rationale Review Process

Purpose

The [Transfer Audit for California’s Systems of Public Higher Education \(2023-123\)](#) recognized the benefits of the Associate Degree for Transfer (ADT) while noting that not every college offers every ADT, and not every California State University (CSU) campus accepts every ADT. Audit Recommendation 13 calls on the California Community Colleges and CSU systems to monitor and review campus rationales for not offering or accepting ADTs.

[California Education Code section 66746\(b\)\(1\)\(C\)](#) requires that “A community college shall create an associate degree for transfer in every major and area of emphasis offered by that college for any approved transfer model curriculum approved subsequent to the commencement of the 2013-14 academic year within 18 months of the approval of the transfer model curriculum.”

Historically, the Chancellor’s Office has monitored ADT implementation but has not maintained a systematic, recurring process for monitoring college rationales or for fully engaging structural concerns regarding TMCs. In response to Recommendation 13, the Chancellor’s Office and the California Community Colleges Curriculum Committee (5C) have implemented a new statewide process to collect, review, and respond to college rationales for ADTs that are not offered. This memorandum outlines this process, which supports statutory requirements, promotes transparency, and helps identify both local and systemic barriers to ADT implementation.

Background

[Recommendation 13 of the Transfer Audit](#) called for a documented process, by September 2025, to request rationales from colleges that do not offer particular ADTs, review those rationales with a focus on disciplines where ADTs would most benefit students, determine whether the rationales

are reasonable using explicit criteria, and elevate systemic challenges to appropriate statewide or intersegmental groups for further action.

To implement this recommendation, the Chancellor's Office distributed a systemwide survey ([Memo ESS 25-17](#)) in April 2025 to collect information on where and which ADTs are and are not offered and to gather detailed rationales for not offering an ADT. The Chancellor's Office analyzed the responses and produced a report on ADT availability and patterns in the rationales ([Assessment of Associate Degree for Transfer Offerings in the California Community Colleges](#)). In August 2025, the Chancellor's Office formalized a [Process for Requesting and Analyzing Specific Rationales for Community Colleges not Offering an Associate Degree for Transfer for a Particular Model Curricula](#).

Establishment of an Ongoing, Cyclical Process

To address the audit recommendation and support continuous improvement, the Chancellor's Office has implemented a **recurring review process** that will occur on a triennial basis. Each cycle includes the following components:

- **Data Collection:** Colleges are surveyed to identify ADTs not offered and to document rationales for non-offering where TMCs exist.
- **Analysis and Reporting:** The Chancellor's Office Research, Analytics, and Data (RAD) unit analyzes survey results and publishes a systemwide summary report.
- **Review and Recommendations:** The report and underlying process is presented to the California Community Colleges Curriculum Committee (5C) for their review and final recommendations using established criteria.
- **Feedback and Guidance:** Colleges receive feedback, guidance, and technical assistance as appropriate.
- **Escalation of Systemic Issues:** Barriers that extend beyond local control are elevated to relevant statewide or intersegmental bodies, including CCCCIO, ASCCC, 5C, and the CSU. These groups can then consider potential adjustments to TMCs, Cal-GETC policy, and related transfer structures.
- **Systemwide Communication:** At the end of each cycle, the Chancellor's Office will share a summary of findings and recommendations, ensuring that the process remains transparent and focused on expanding high-quality ADT pathways over time.

This process is intended to support colleges in meeting ADT requirements while also identifying opportunities for statewide coordination and improvement.

Summary of 2025 Review Cycle

Rationales for ADTs Not Offered

The 2025 survey responses from colleges revealed several reasons for not offering particular ADTs. Common rationales included:

- Insufficient local course availability to meet TMC requirements.
- Limited faculty, facilities, or enrollment capacity to sustain the program.
- Challenges meeting the 60-unit limit, particularly in high-unit STEM disciplines.
- Limited local capacity to develop and submit curriculum proposals.
- Perceived limited student benefit due to a lack of CSU “similar” determinations.

These rationales reflect a mix of local resource constraints, curriculum alignment challenges, and intersegmental factors.

Review Criteria

The criteria formed by the California Community Colleges Curriculum Committee (5C) reviewed selected rationales using broad criteria organized into two primary categories:

- **Structural or Statutory Constraints:** Issues related to Education Code requirements, TMC design, C-ID alignment, or other statewide curriculum structures.
- **Local Capacity or Viability Constraints:** Issues related to staffing, facilities, enrollment demand, or local curriculum development capacity.

This framework helps distinguish barriers that may require statewide or intersegmental action from those practices best addressed through local planning and support. Rationales based on local college limitations would require the colleges (as opposed to 5C) to engage in self-evaluation of the reasons for not offering certain ADTs.

Identified Challenge Areas

The first cycle of review confirmed three overarching challenge areas that capture most of the system-level barriers to broader ADT implementation: misalignment between the ADT and local context (including transfer destinations, institutional goals, and community or regional workforce needs); resource constraints that affect the ability to initiate and sustain ADT offerings; and challenges related to ADT development and approval processes, including understanding and managing C-ID and Chancellor’s Office approval timelines.

- In the **area of misalignment**, colleges reported that certain TMCs do not map neatly onto local course offerings, institutional priorities, or the mix of nearby CSU programs deemed similar. The Chancellor’s Office and 5C acknowledge the partnerships that colleges cultivate with their CSU campuses and recommend that colleges re-initiate or deepen discipline-specific dialogue with CSU partners to clarify lower-division expectations and consider how ADT structures can support successful transfer. These conversations should include articulation officers and, where helpful, facilitation by the ASCCC to increase shared understanding of TMC frameworks and C-ID processes. At the same time, colleges are encouraged to investigate and engage in professional learning opportunities for counselors and transfer center staff so that advising more consistently reflects CSU determinations of similar, local admission nuances, and ADT/TMC structures. Colleges can also use the California Virtual Campus (CVC) to expand access to key courses that may not be readily available locally, particularly in small or rural-serving colleges. When misalignment is driven by policy or structure rather than local implementation—for example, the difficulties of high-unit STEM TMCs or the interplay between Cal-GETC, residency requirements, and local degree structures—5C has recommended ongoing collaboration and advocacy with appropriate oversight bodies to explore options such as partial Cal-GETC certification for high-unit STEM ADTs/TMCs, carefully targeted increases in unit caps (up to 66 units where permitted by law), expanded CSU determinations of similarity, and review of California Code of Regulations title 5 degree residency requirements.
- In the **area of resources**, the survey and subsequent discussion highlighted persistent constraints on counseling capacity, faculty staffing, and physical infrastructure, particularly for lab-intensive or high-unit majors. In response, colleges are encouraged to align local planning and resource allocation with ADT priorities, using shared governance and budget processes to consider how best to strengthen counseling, transfer advising, and articulation support in disciplines where there is student demand for ADTs. Challenges pertaining to facilities may be addressed through partnerships with industry and community organizations, which can host specialized courses that help complete ADT requirements. The 5C recommendations also emphasize the importance of using local and statewide data to understand how students are currently transferring to CSU and whether ADTs could better meet their needs, as well as highlighting CSU resources—such as websites showing determinations of similar—that should inform both program development and counseling.
- For **development and approval processes**, colleges reported uncertainty about C-ID timelines, Chancellor’s Office ADT approval requirements, and how to manage multiple related ADTs. To reduce these barriers, the Chancellor’s Office and 5C are working to increase awareness that C-ID reviews generally operate on a forty-five-day timeline and

that, after this period, courses with pending C-ID review may receive tacit approval for the purposes of ADT development. The Chancellor's Office is also clarifying that ADTs do not need to be resubmitted solely for course number alignment with C-ID, provided the course content and outcomes remain consistent with what was approved for the TMC. Finally, colleges are reminded that they may, through local governance processes, decide to offer only one ADT where there are overlapping TMCs, while also being encouraged to consider that CSU determinations of similarity can vary by campus; in some cases, offering more than one ADT in a related area may expand students' transfer options.

Guidance and Next Steps for Colleges

Colleges are encouraged to use the findings from this review as a springboard for local reflection, planning, and decision-making related to ADT development and implementation. As a first step, institutions should review their current ADT portfolios and compare them against the list of TMCs, identifying disciplines where ADTs are available statewide but not yet offered locally. Colleges can then revisit existing rationales for non-offerings using the challenge areas outlined above, asking whether conditions have changed, whether new partnerships or modalities (including the CVC) could make an ADT more feasible, and where student demand and equity goals suggest that development should be prioritized. This work is most effective when it is collaborative; therefore, colleges are strongly encouraged to engage discipline faculty, curriculum committees, local academic senates, counselors, transfer center staff, and articulation officers in structured conversations about ADT feasibility, benefit, and design. In many cases, dialogue with nearby CSU partners—supported by ASCCC and 5C where needed—can clarify expectations and reveal solutions that support students across segments.

Colleges should also integrate ADT planning into broader equity and transfer strategies, including student equity plans, Guided Pathways efforts, and local transfer initiatives. Where ADT availability intersects with transfer-related equity gaps, making progress on ADT development can be a powerful lever for improving outcomes. Finally, colleges are asked to participate fully in future cycles of the ADT rationale review process by responding to surveys, sharing local data, and engaging with technical assistance and professional development opportunities that emerge from this work. Doing so will help ensure that the ADT system continues to evolve in ways that reflect real-world constraints while keeping student access, clarity, and equity at the center.

Contacts

The Chancellor's Office appreciates the thoughtful work of colleges, faculty, and staff to develop and sustain ADT pathways that help more students realize their transfer and degree goals. The Chancellor's Office will continue to work with 5C, system partners, and colleges to address both local and systemic barriers and to support equitable student access to ADTs statewide.

For questions about the ADT rationales review process, the statewide analysis, or available technical assistance, colleges may contact Dean Raul Arambula at RArambula@CCCCO.edu.

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