Dear Professor Stanskas and Professor Panske,

We as California community college mathematics faculty are writing to you as leaders of the Intersegmental Curriculum Workgroup and C-ID Advisory Committee to express our support for statistics pathways. We support statistics pathways as a means for students to satisfy both lower division quantitative reasoning requirements and Statistics requirements or options for the Associate Degree for Transfer (ADT).

We are concerned for several reasons about the recent proposed inclusion of intermediate algebra as a separate course requirement for nine ADTs associated with popular majors, such as Administration of Justice, Psychology, Business Administration, and Kinesiology. This change will require students to not only complete Statistics but also to demonstrate intermediate algebra proficiency, which will shut tens of thousands of students out of statistics pathways.

The decision to add the intermediate algebra proficiency to these ADTS is the result of a problematic process initiated by the ICW and will exacerbate low completion rates and inequity in educational outcomes for community college students.

Exacerbates low completion and inequity

In community colleges nationwide, intermediate algebra requirements have historically driven low transfer math completion rates for all students with a substantial disproportionate impact on students of color. In California the discriminatory impact of intermediate algebra requirements is receiving increasing public scrutiny. In 2016 UC Berkeley Law Professor Chris Edley requested an investigation by the U.S. Department of Education into the disparate impact of such requirements on protected groups as a violation of the equal protection clause of the California State Constitution and federal regulations associated with Title VI of the Civil Rights Act of 1964.

With a focus on equity for all community college transfer students, the CSU Quantitative Reasoning Task Force report (September 2016) describes transfer policies based on intermediate algebra requirements as holding community college students to a higher standard of math proficiency than entering CSU freshmen who pass the CSU math placement test (ELM) or remediate within the CSU.

Given that the imposition of intermediate algebra will exacerbate racial inequity in educational outcomes, both in ADT completion for these popular majors and in transfer, and hold community college students who remediate to a higher standard, the ICW must require a strong evidence base to determine whether intermediate algebra proficiency is in fact needed for success in the majors associated with these ADTs.

Problematic process

As mathematicians and math educators we expect mathematics requirements for any ADT to be meaningfully aligned with upper division requirements for the major. We rely on the

expertise of the Faculty Disciplinary Review Groups (FDRGs) for these ADTs to make this determination in light of a good understanding of the learning goals and topics of intermediate algebra as contrasted with elementary algebra.

Because this decision will impact tens of thousands of students each year, we were dismayed and disappointed to learn that the memo sent to the FDRG Leads imposed intermediate algebra as a default if the FDRG did not respond in a short window of time when many colleges were on spring break. In addition, there was no expectation that the FDRG would provide evidence that intermediate algebra is indeed required for upper division course work in the major or that they would vet the proposed change publicly as is currently done with changes to the Transfer Model Curriculum.

After the change to C-ID Math 110 prerequisite, all of the ADTs in question would have allowed a student to fulfill math requirements using an approved statistics pathway because none of the other required course work for these ADTs has intermediate algebra as a prerequisite. Allowing students in majors that require statistics to benefit from a statistics pathway promises to be a high leverage strategy for improving completion rates, decreasing time to degree and addressing equity gaps. However, despite the fact that intermediate algebra proficiency is not needed for success in lower division major prep in these ADTs, it is now being imposed with no evidence that it is required for upper division course work in the associated majors.

Remedy

To protect tens of thousands of students each year from educationally unjustified math requirements that also perpetuate inequity, we request that intermediate algebra be removed as a requirement in every ADT until a rigorous content validation process can demonstrate the legitimate need of core intermediate algebra skills as preparation for upper division course work in the associated major.

Because the community colleges will be expected to verify intermediate algebra proficiency, this validation needs to adhere to Title 5 standards for establishing prerequisites; namely, the FDRG must make the case that students without intermediate algebra proficiency are "highly unlikely" to succeed in the program of study.

We further request that ICW and C-ID Advisory Committee require the FDRGs to vet proposed changes to the ADTs and make public the decisions and rationales for the inclusion of intermediate algebra, as is currently done with changes to the Transfer Model Curriculum.

In closing we are inspired by the completion and equity goals of both the CCC and CSU. We support legitimate and meaningful mathematics requirements clearly aligned with a student's program of study, including the use of statistics pathways to meet lower division requirements for quantitative reasoning and for major preparation in non-math intensive fields.

Sincerely,

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