

California College Promise: The Relationship Between State Policy and Local Programs

This brief, the third in a series produced by the California College Promise Project (CCPP) at WestEd,¹ describes research conducted by the CCPP on the relationship between the 2017 legislation “Community Colleges: California College Promise” (AB19) and the structure of local College Promise programs. The analysis examines College Promise programs between August 2017 and August 2019, exploring the extent to which the legislation may have contributed to structural changes in programs that had existed before the legislation as well as the degree to which it is reflected in the design of programs that were developed after the legislation was in place.

The findings described in this brief can help California’s state-level policymakers and education leaders to understand the ways in which AB19 might have contributed to the College Promise landscape and to consider potential revisions to the legislation or guidance to achieve the state’s desired results. This brief also offers insight that can help policymakers in other states to craft policy that influences the program design and, ultimately, the outcomes they seek in their state’s own College Promise programs. College Promise programs provide support for students to attend and complete college based on where they live or where they attend school.² The first College Promise program in the United States started in

¹ The first CCPP brief outlines the policy context that helped fuel the growth of College Promise programs in California, highlights implementation challenges, and makes recommendations for maximizing programs’ equity and impact (Rauner, M., & Lundquist, S. [2019]. *College Promise in California: Recommendations for Advancing Implementation, Impact, and Equity*. WestEd. <https://californiacollegepromise.wested.org/wp-content/uploads/2019/11/California-College-Promise-Legislation-Brief-FINAL.pdf>). The second CCPP brief describes the landscape and evolving structures of California’s programs and outlines the relationship between program characteristics and equitable student access and outcomes (Rauner, M., & Smith, A. [2020]. *College Promise programs: A description of the California landscape*. WestEd. <https://californiacollegepromise.wested.org/wp-content/uploads/2020/02/CCPP-Research-Brief-2-022720-final.pdf>).

² Rauner, M., Perna, L., & Kanter, M. (2018). *California College Promise program characteristics and perceptions from the field*. WestEd. <https://www.wested.org/resources/california-college-promise-program-characteristics-and-perceptions/>.

2006, and by summer 2020 there was a total of 358 state and local programs.³ California is home to 121 of the programs, the largest number in any state.⁴

State policymakers and education leaders are increasingly interested in leveraging the College Promise concept to incentivize students to complete higher education, gain access to living-wage jobs, and, by doing so, ultimately strengthen their local economies. Twenty-eight states have already passed legislation and appropriated funding for a state-level College Promise program,⁵ but other states may lack sufficient and sustainable funding to begin their own initiatives, particularly given the COVID-19-driven economic recession. For states in which full funding of programs is not possible, an alternative approach is to enact legislation similar to AB19, which provides partial funding to encourage local College Promise program development and expansion.

AB19 makes funding available to community colleges to either expand or launch local College Promise programs.⁶ Under the legislation, California community colleges must meet several requirements in order to receive AB19 funding⁷ that can be spent on activities that meet the stated goals of the legislation (e.g., increase college enrollment and completion and reduce achievement gaps). For colleges that choose to use the funding for tuition waivers, the legislation requires specific student eligibility requirements.⁸

Data

The California College Promise program data used for this analysis were gathered over a three-year period. The CCPP team conducted two rounds of formal data collection (spring 2016 and summer 2018) through program surveys, internet searches, direct communication with program administrators, and Google News alerts. Throughout the study period, the database was updated when new programs were launched and when existing programs made changes.

The name College Promise is used to describe programs with a wide range of eligibility requirements and student benefits. The programs included in this analysis share the following six criteria:

- are based at a California community college
- provide direct financial support for college costs

³ According to the College Promise website, there are 325 local programs and 29 statewide programs.

<https://www.collegepromise.org/>.

⁴ Rauner & Smith (2020).

⁵ Two states (Montana and Connecticut) passed legislation without funding (M. Kanter, personal communication, September 9, 2020).

⁶ Assembly Bill 19 (2017–2018). Chapter 725 (Cal. Stat. 2017).

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB19.

⁷ Under AB19, colleges are eligible to receive an AB19 allocation if they partner with a local education agency to improve college readiness, establish an early commitment to college programs, utilize multiple measures of assessment for placement, commit to the California Guided Pathways program, leverage the California College Promise Grant (formerly BOG waiver), and participate in the federal loan program.

⁸ According to the legislation, students who receive tuition waivers through AB19 must complete a Free Application for Federal Student Aid (FAFSA), Cal Grant, or Dream Act application; be a first-time college student; and enroll full time (i.e., take 12 or more semester units).

- serve students based on where they live or attend school
- use an objective selection process to determine student eligibility
- expect that the program will be ongoing
- were developed to meet local needs rather than to exclusively implement California's state-mandated fee-waiver program for low-income students, the California College Promise Grant (CCPG)⁹

Based on these criteria, 70 programs among the 110 College Promise programs anchored in California community colleges were eligible to be included in the analysis. The 70 programs were separated by pre- and post-AB19 status. Pre-AB19 programs, of which there are 46, provided support to students prior to August 2017. The 64 programs in the post-AB19 group began providing support to students sometime between September 2017 and August 2019.

Nine colleges opted out of receiving AB19 funding for the 2018/19 academic year. Even though they decided against receiving AB19 funding, six of the nine had instituted a College Promise program by August 2019. They were included in the analysis because they had the opportunity to receive AB19 funding, and the structure of their programs may have been influenced by the legislation and its parameters.¹⁰ The other three colleges did not have a College Promise program as of August 2019 and were therefore not included in the analysis.

Methods

This study describes changes in College Promise programs over a two-year period, from August 2017 to August 2019. The first point in this time span, August 2017, was just 1 month before the California governor signed AB19 into law and 10 months before the funding was formally included in the state budget and allocated to participating college districts. As of that August, there were 46 (pre-AB19) programs.

By the end of the analysis period, August 2019, a year had passed since the initial AB19 funding was allocated to participating colleges, allowing program leaders to design or redesign programs for the fall 2019 semester. During those two years, an additional 64 College Promise programs first provided support to students, the largest number of new programs in any two-year period since the first College Promise program was established in California in 2005.

⁹ Nine community colleges were excluded from the analysis because the only student support they offered was administration of the California College Promise Grant (CCPG), a state-mandated fee-waiver program for low-income students. The CCPG was formerly called the Board of Governor's Fee Waiver Program. See *College Promise in California: Recommendations for Advancing Implementation, Impact, and Equity*: <https://californiacollegepromise.wested.org/wp-content/uploads/2019/11/California-College-Promise-Legislation-Brief-FINAL.pdf> for details about this entitlement program.

¹⁰ The College of the Desert's pLEDGE Program is in the pre-AB19 group but did not accept AB19 funding in 2018/19 or in 2019/20. Barstow Community College, Mt. San Jacinto College, Palo Verde College, and both San Bernardino colleges (Crafton Hills and San Bernardino Valley) are included in the post-AB19 group and did not accept AB19 funding in 2018/19 but did accept it in 2019/20.

The two broad categories of College Promise program features examined in this analysis are eligibility requirements and student support. The number and percentage of pre-AB19 programs that included each eligibility requirement and student support feature were calculated as of August 2017 and then again as of August 2019. Similarly, the number and percentage of post-AB19 programs that included each eligibility requirement and student support feature were calculated as of August 2019. To identify similarities and differences, the 2019 data on the pre-AB19 program features were then compared with the 2019 data on the post-AB19 program features.

Definitions

The College Promise program features examined in this analysis are described below.

Eligibility Requirements

Place-based eligibility requirements included in this analysis, sometimes referred to as residency requirements or attendance requirements, are

- local or regional residency or high school attendance that is not statewide, such as graduates from a particular high school or district or residency within a particular city or college service area;
- state residency, including AB540-eligible¹¹ students; and
- no place-based requirements.

Merit-based eligibility requirements usually use a minimum grade point average (GPA) or test score. Most need-based eligibility requirements use a specific expected family contribution calculated by the Free Application for Federal Student Aid (FAFSA). In California, need is determined by a student's eligibility for the need-based tuition fee-waiver grant.

Other program eligibility requirements included in this analysis are first-time college student status,¹² full-time enrollment, and recent high school graduation (defined as enrolling within two years of graduation).

Student Support

The student support features included in this analysis are providing program participants with tuition and fees, financial support beyond tuition and fees, and nonfinancial supports. The analysis only

¹¹ AB540 exempts college students from California residency requirements if they have graduated with or have the equivalent of a California high school diploma and have attended an elementary school, high school, or community college in California for three or more years. It was passed with the intention of reducing access barriers for students who are undocumented, commonly known as Dreamers. For more information, see <https://admission.universityofcalifornia.edu/tuition-financial-aid/tuition-cost-of-attendance/ab-540-nonresident-tuition-exemption.html>.

¹² A first-time college student is one who has no prior postsecondary experience, except for the previous summer term and/or college credits earned before to high school graduation. See <https://surveys.nces.ed.gov/ipeds/public/glossary> for more information.

included support features that were explicitly and exclusively part of the program, not something provided to all students at the college.

Examples of financial support beyond tuition and fees include support for books and materials, transportation, and stipends. In addition to indicating whether or not a program provides nonfinancial support, the analysis data are further separated into three categories:

- academic supports (e.g., tutoring; priority registration; First-Year Experience, First-Year Program, or similar cohort-based college success course; and early alert systems, advising/transfer planning, or a dedicated College Promise counselor);
- student services (e.g., counseling, advising, mentoring, peer mentoring, financial literacy courses, success coaches, and success workshops); and
- career/workforce supports (e.g., internship programs and career workshops).

Findings

The following sections describe the changes made to College Promise programs that were in existence prior to the passage of AB19, the influence of AB19 on the structure of new programs, and the differences between the characteristics of pre- and post-AB19 programs.

Changes in Preexisting College Promise Programs After AB19

Most eligibility requirements for College Promise programs that started before AB19 changed only slightly.

In August 2017, 41 (89 percent) of the 46 programs that had started before AB19 required students to enroll full time. In August 2019, with AB19 in place, the number of pre-AB19 programs with this requirement had increased slightly, to 43 (93 percent). In 2017, the majority (43, or 89 percent) of pre-AB19 programs were available only to first-time college students. In 2019, that number had increased to 44 (96 percent). In 2017, a smaller number (38, or 83 percent) of pre-AB19 programs required students to be a recent high school graduate. In 2019 that number had decreased to 34 (74 percent).

Eligibility requirements based on merit and need are uncommon in California College Promise programs. The number of pre-AB19 programs with merit-based requirements rose from 7 to 8 under the new legislation. In 2017, an even smaller number of programs required that students demonstrate financial need — 2 of the 46 pre-AB19 programs — and this number remained stable over time.

Pre-AB19 programs broadened their geographic reach to accept students from across the state.

Among the 46 programs that had started prior to AB19, there was an increase between 2017 and 2019 in the number that were available to any California resident and to AB540-eligible students, from 1 program (2 percent) in 2017 to 14 (30 percent) in 2019. There was a concurrent decrease in the number of programs requiring students to be from a restricted geographic area within California rather than from anywhere in the state, from 41 (89 percent) in 2017 to 32 (70 percent) in 2019, with 9 of the original 41 subsequently being made available to students from anywhere in the state.

The 4 programs that did not have place-based eligibility requirements in 2017 (meaning that out-of-state students were eligible) had added a California state residency/AB540 eligibility requirement by 2019.

See table 1 for a summary of the changes in eligibility requirements.

Table 1. Changes in Eligibility Requirements in Pre-AB19 Programs, 2017–2019 (N=46)

Eligibility requirement	August 2017 number (%)	August 2019 number (%)	Change in number of programs adding or deleting specific requirements
Full-time enrollment	41 (89%)	43 (93%)	+2
First-time college student	43 (93%)	44 (96%)	+1
Recent high school graduate	38 (83%)	34 (74%)	–4
Merit based	7 (15%)	8 (17%)	+1
Need based	2 (4%)	2 (4%)	0
Place based: Local or regional residency/high school attendance	41 (89%)	32 (70%)	–9
Place based: State residency/AB540	1 (2%)	14 (30%)	+13
Place based: None stated	4 (9%)	0	–4

About one quarter of pre-AB19 programs extended the length of financial support to students.

Prior to AB19, 9 (20 percent) of the 46 College Promise programs provided student support for two years, while 31 (67 percent) provided support for one academic year, and 5 (11 percent) provided support for one semester. One program (2 percent) provided support for an unlimited time period. After AB19, the number of pre-AB19 programs that provided two years of student support increased to 20 (43 percent).

The number of programs that provided financial assistance beyond tuition and fees slightly decreased.

Between 2017 and 2019, 3 pre-AB19 programs that had previously provided students with other financial support in addition to tuition and fees stopped providing those benefits.

For a summary of the changes to student financial support, see table 2.

Table 2. Changes in Financial Support for Students in Pre-AB19 Programs, 2017–2019 (N=46)

Financial support	August 2017 number (%)	August 2019 number (%)	Change in number of programs from 2017 to 2019
Tuition and fees for 0.5 year	5 (11%)	3 (7%)	–2
Tuition and fees for 1 year	31 (67%)	22 (48%)	–9
Tuition and fees for 2 years	9 (20%)	20 (43%)	+11
Tuition and fees for unlimited years	1 (2%)	1 (2%)	0
Specific dollar amount*	2 (4%)	2 (4%)	0
Financial award beyond tuition and fees	21 (46%)	18 (39%)	–3

*Two pre-AB19 programs offered students a set dollar amount in both 2017 and 2019. Santa Cruz County’s College Commitment (S4C) provided students \$500 in their first year, and Cerro Coso Promise provided students up to \$1,000 per semester. S4C is a “first dollar” program, meaning that all students receive the award regardless of other aid they receive. Cerro Coso’s program is “last dollar,” meaning that funding covers the portion of tuition and fees that is not covered by other awards.

More than one quarter of the pre-AB19 programs increased the breadth and depth of the nonfinancial supports provided to students.

From 2017 to 2019, only 2 (4 percent) pre-AB19 programs that had not offered nonfinancial support to their College Promise students began providing that support (table 3). However, during that two-year period, the number of programs providing students with more than one type of nonfinancial support (e.g., academic supports, student services, career/workforce supports) increased by 9 (20 percent), from 24 (52 percent) to 33 (72 percent). During this period, 13 (28 percent) programs added at least one new category of nonfinancial support.

Table 3. Changes in Nonfinancial Support for Students in Pre-AB19 Programs, 2017–2019 (N=46)

Nonfinancial support	August 2017 number (%)	August 2019 number (%)	Change in number of programs from 2017 to 2019
Provided nonfinancial support	34 (74%)	36 (78%)	+ 2
Provided more than one category of nonfinancial support	24 (52%)	33 (72%)	+9
Added at least one new category of nonfinancial support	N/A	13 (28%)	N/A

Table 4 displays the number of pre-AB19 programs that provided each type of nonfinancial support out of the total number of programs that provided nonfinancial support in 2017 (34) and 2019 (36). The data show that most of the programs provided academic support at each time, and both the number and percentage of programs providing academic support increased over time (from 83 percent in 2017 to 97 percent in 2019).

Slightly over three quarters (78 percent, or 28 out of 34) of the programs that provided nonfinancial support in 2017 included student services in their offerings. That percentage increased to 94 percent (or 34 out of 36) in 2019. Only a few of the programs that included nonfinancial support provided students with career/workforce supports, but both the number and percentage increased over time (2 programs, or 6 percent, in 2017 and 10 programs, or 28 percent, in 2019).

Table 4. Number and Percentage of Pre-AB19 Programs Offering Specific Types of Nonfinancial Support, Based on Number of Programs Providing Nonfinancial Support, August 2017 and August 2019

Nonfinancial support	August 2017 number (%) N=34	August 2019 number (%) N=36
Academic supports	30 (83%)	35 (97%)
Student services	28 (78%)	34 (94%)
Career/workforce supports	2 (6%)	10 (28%)

Influence of AB19 on Structure of New College Promise Programs

Most post-AB19 programs share similar eligibility requirements with each other and with pre-AB19 programs. Of the 64 post-AB19 College Promise programs in this analysis, almost all (59, or 92 percent) limited participation to first-time college students enrolled on a full-time basis. When it comes to need- or merit-based participation, the post-AB19 programs are largely similar to one another in that only a relatively small number included requirements based on financial need (4 programs, or 6 percent) or merit (9 programs, or 14 percent).

Common eligibility requirements across post-AB19 programs mirrored those in the pre-AB19 programs in 2019. Almost all of the 46 pre-AB19 programs required students to be first-time college students (44, or 97 percent) and to enroll on a full-time basis (43, or 93 percent), with very few including any requirements based on need (2, or 4 percent) or merit (8, or 17 percent).

Place-based and enrollment-timing requirements varied across post-AB19 programs, as well as between pre- and post-AB19 programs in 2019. Although eligibility requirements were similar among the post-AB19 programs, there was some variation in eligibility requirements based on residency and enrollment. Of the 64 post-AB19 programs, 41 (64 percent) accepted students who were state residents or were AB540 eligible. The other 23 (36 percent) limited eligibility to students who lived or attended school in a defined region or local area that was not statewide, such as a city, county, or college service area.

While there was variation in place-based eligibility requirements within both pre- and post-AB19 programs, most pre-AB19 programs (32, or 70 percent) required students to live in or attend high school in a geographic area that was not statewide, and most post-AB19 programs (41, or 64 percent) accepted residents from anywhere in the state and/or AB540 students.

Another difference between pre- and post-AB19 programs is related to enrollment timing. In 2019, most pre-AB19 programs (34, or 74 percent) were only open to recent high school graduates, whereas only 22 (34 percent) of post-AB19 programs included this requirement.

Table 5 shows the differences between pre- and post-AB19 program eligibility requirements in 2019.

Table 5. Eligibility Requirements in Pre- and Post-AB19 Programs, August 2019

Eligibility requirement	Pre-AB19 programs number (%) N=46	Post-AB19 programs number (%) N=64
Full-time enrollment	43 (93%)	59 (92%)
First-time college student	44 (96%)	59 (92%)
Recent high school graduate	34 (74%)	22 (34%)
Merit based	8 (17%)	9 (14%)
Need based	2 (4%)	4 (6%)

Eligibility requirement	Pre-AB19 programs number (%) N=46	Post-AB19 programs number (%) N=64
Place based: Local or regional residency/high school attendance	32 (70%)	23 (36%)
Place based: State residency/AB540	14 (30%)	41 (64%)
Place based: None stated	0	0

Compared to post-AB19 programs, pre-AB19 programs in 2019 supported students for a longer period of time and provided more financial support beyond tuition and fees. Although the majority of both pre- and post-AB19 programs provided students with one year of support, a slightly higher proportion of pre-AB19 programs offered two years of support (43 percent) compared to post-AB19 programs (36 percent).

Further, a higher percentage of pre-AB19 programs than post-AB19 programs (39 percent and 28 percent, respectively) provided students with financial support beyond tuition and fees (table 6).

Table 6. Financial Support in Pre- and Post-AB19 Programs, August 2019

Financial support	Pre-AB19 programs N=64 number (%)	Post-AB19 programs N=46 number (%)
Tuition and fees for 0.5 year	3 (7%)	1 (2%)
Tuition and fees for 1 year	22 (48%)	38 (59%)
Tuition and fees for 2 years	20 (43%)	23 (36%)
Tuition and fees for unlimited years	1 (2%)	1 (2%)
Specific dollar amount	2 (4%)	0
Financial award beyond tuition	18 (39%)	18 (28%)

In 2019, more than three quarters (76 percent) of pre-AB19 programs provided some type of nonfinancial support (i.e., academic, student services, and/or career supports) to their program participants, compared to 58 percent of the programs that started after AB19 (table 7).

Table 7. Nonfinancial Support in Pre- and Post-AB19 Programs, August 2019

Nonfinancial support	Pre-AB19 programs number (%) N=46	Post-AB19 programs number (%) N=64
Provided nonfinancial support	35 (76%)	37 (58%)
Provided more than one category of nonfinancial support	33 (72%)	26 (41%)

Table 8 shows the number of pre- and post-AB19 programs that, as of August 2019, provided specific types of nonfinancial support. The percentage of programs for each type is based on the total number of programs that were providing any nonfinancial support (i.e., 35 pre-AB19 programs and 37 post-AB19 programs).

There is some consistency across the pre- and post-AB19 programs. More than 90 percent of both pre- and post-AB19 programs that included some type of nonfinancial support provided academic support (94 percent, or 33 of 35 pre-AB19 programs; and 97 percent, or 36 of 37 post-AB19 programs). Another similarity is that around 30 percent of programs in both groups provided career and workforce support (29 percent, or 10 of 35 pre-AB19 programs; and 32 percent, or 12 of 37 post-AB19 programs).

There is, however, a notable difference in the percentage of programs in each group that provided student services support as part of their nonfinancial support. Among pre-AB19 programs, 94 percent (33 of 35) included student services, compared to only 62 percent (23 of 37) of post-AB19 programs.

Table 8. Number and Percentage of Pre- and Post-AB19 Programs Offering Specific Types of Nonfinancial Support, Based on Number of Programs Providing Nonfinancial Support, August 2019

Nonfinancial support	Pre-AB19 programs number (%) N=35	Post-AB19 programs number (%) N=37
Academic supports	33 (94%)	36 (97%)
Student services	33 (94%)	23 (62%)
Career/workforce supports	10 (29%)	12 (32%)

Limitations

Findings from this study may not be generalizable to other states unless they have a strong foundation on which to develop and strengthen College Promise programs as California already had when AB19 legislation was passed. California community colleges charged no tuition until 1985 and, when tuition was then imposed, the state began providing low-income students with tuition waivers, an entitlement program that continues to this day. Most College Promise programs in California leverage multiple funding streams, using the state's fee-waiver program as a central funding source. In addition, California has been home to some of the earliest and most visible College Promise programs in the country, models that were emulated in other California communities. Finally, local government and nonprofit, foundation, and business leaders have provided state convenings, research, and technical assistance to the field since 2016, contributing to the enthusiasm around College Promise and the continued growth in the number of programs.¹³

In addition, AB19 is an opt-in program that includes funding rather than an unfunded mandate. It allows colleges a great deal of flexibility in how to spend the resources. States that pass legislation without these parameters may have outcomes different from those found in this analysis.

This descriptive study examines program characteristics before and after the College Promise legislation was passed and was not designed to attribute a causal relationship between the legislation and program structure. Instead, the brief describes the data and suggests explanations for observed changes, including the possible influence of factors outside of legislation.

The data used in this analysis provides limited insight into the extent to which AB19 has contributed to program structures that reduce achievement gaps, one of the goals of the legislation. Assumptions can be made about the extent to which program features promote equity; for example, need-based programs may be perceived as inherently more equitable because they limit support to students with greater financial need. On the other hand, merit-based programs, which often require a minimum high school grade point average (GPA) for students to be eligible, may be considered less equitable because they exclude students who may have received an under-resourced education. However, no single program feature can provide the full picture of the extent to which a program is equity focused. A need-based program may not, for example, provide the necessary support for students to persist and complete their education. A more thorough analysis could analyze student outcome data by race/ethnicity and gender, for example.

It is important to note that the timeline for the study covers only two years and may not be long enough to capture changes programs make over time. Future CCPP analysis will also consider AB2, legislation passed after the period of this analysis that added funding to AB19 to support students for two years.¹⁴

¹³ Rauner & Lundquist (2019); Rauner, Perna, & Kanter (2018).

¹⁴ Assembly Bill 2 (2019–2020). Chapter 509 (Cal. Stat. 2019).

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB2

Finally, despite multiple rounds of formal data collection and ongoing data gathering, some program data may be inaccurate due to outdated website information and inability to contact program directors to verify data.

Discussion

The findings from this analysis have several implications for state policymakers and education leaders who are considering legislation to incentivize the development and expansion of local College Promise programs.

Policymakers can anticipate that College Promise legislation similar to California's AB19 will result in an increase in the number of local programs in their state. The analysis suggests that even though the number of California's programs grew in the years prior to AB19, more programs were developed during the two years after legislation than in any other two-year period. The largest number of new programs developed over a two-year period prior to AB19 had been in 2016 and 2017, when 38 new programs were launched, which is little more than half of the 64 programs initiated after passage of the legislation.

There also appears to be a relationship between AB19 and the expansion of programs that existed before the legislation was adopted. This analysis found that during the two years following AB19's passage, 24 percent of pre-AB19 programs (11 of 46) extended student benefits from one year or one semester to two years. Further, 28 percent (13 of 46) provided their students with at least one additional type of nonfinancial support. Because preexisting programs had already allocated resources to their programs, they could use their AB19 funds to expand student supports. In contrast, new programs used AB19 funds to get started, which in some instances meant simply translating the new funding directly into student financial support.

This analysis indicates that the student eligibility requirements specified in the legislation had limited influence on the requirements in both pre- and post- AB19 programs. Merit- and need-based requirements were uncommon across both pre- and post-legislation programs, while, by 2019, requirements related to being a first-time college student and being enrolled full time were included in most programs. The consistency across programs is perhaps due to the fact that eligibility requirements outlined in the legislation were almost identical to that of existing programs.

Beyond AB19 legislation, among other possible influences on program design are existing program structures in California and other states, as well as the findings from research on factors that contribute to student outcomes. For example, a decision to limit program participation to full-time students may be based on data showing that part-time students are less likely to complete a certificate or degree than full-time students.¹⁵ Future CCPP research will explore whether College Promise student outcomes vary by level of enrollment (i.e., part-time versus full-time), recognizing that typical community college

¹⁵ Juskiewicz, J. (2020, July). *Trends in community college enrollment and completion data* (Issue 6). American Association of Community Colleges. https://www.aacc.nche.edu/wp-content/uploads/2020/08/Final_CC-Enrollment-2020_730_1.pdf; Complete College America (2011). *Time is the enemy*. <https://www.luminafoundation.org/wp-content/uploads/2017/08/time-is-the-enemy.pdf>

students are less likely than four-year college students to be employed while taking classes.¹⁶ The relatively small percentage of College Promise programs in the study that have a merit-based admission requirement — and the omission of merit requirements in the legislation — may have been influenced by California’s history of equitable higher education, including enrollment waivers for low-income community college students regardless of high school achievement.

Although most pre-AB19 program features remained the same after the legislation was adopted, the data uncover two examples of changes in pre-AB19 programs over the two-year study period, as well as differences between pre- and post-AB19 programs.

First, while 83 percent (38 of 46) of pre-AB19 programs had originally required participants to be recent high school graduates, following passage of the legislation, the percentage of programs with that requirement decreased to 74 percent (34 of 46). By comparison, only 34 percent of post-AB19 programs (22 of 64) required recent high school graduation.

Second, the largest change in pre-AB19 program eligibility requirements for students was in how place-based programs defined “place.” After the law was passed, guidance from the California Community College Chancellor’s Office (CCCCO) explained that College Promise programs can recruit any California resident or AB540-eligible student, an exception to the existing practice at the time that could limit recruitment to a college’s service area. The data suggest that this guidance may have influenced the structure of pre- and post-AB19 programs. Before AB19, 89 percent of the programs limited program participation to students in their communities through local high school attendance or city/county residency requirements. This may be explained by the community-driven nature of College Promise programs and the partnerships between colleges, K–12 districts, local governments, and community groups. Two years after AB19 was passed, fewer programs (70 percent) limited access by accepting only “local” students, and more programs were open to any state resident or AB540-eligible student. Even so, pre- and post-AB19 programs differed in 2019, with the 64 percent of post-AB19 programs open to students with residency anywhere in the state or eligible under AB540, compared to only 30 percent of pre-AB19 programs with the same eligibility requirement.

In both examples, the eligibility requirements were not included in the legislation. This suggests that instead of being influenced by the parameters that were included in the legislation, the program changes may have been made because of parameters that were omitted from the legislation or may have been due to the omission of post-legislation guidance from the CCCCCO.

Policymakers considering emulating California’s College Promise legislation are likely to see an increase in the number of new programs and the expansion of existing programs. If legislation allows colleges to have flexibility in the way they use the funding, the relationship between legislation and program structure may not be clear. Thus, it is important to clearly state the goals of the legislation and to systematically gather the data needed to analyze the short- and long-term impact of legislation on program structures and student outcomes.

¹⁶ Juskiewicz (2020).

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