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Office of the Academic Senate  
SANTA CRUZ DIVISION  
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May 14, 2024

JAMES STEINTRAGER  
Chair, Academic Council

**Re: Second Systemwide Senate Review of Proposed Senate Regulation 424.A.3 (Area H)**

Dear James,

The Santa Cruz Academic Senate has reviewed your request for review of the second review of proposed Senate Regulation 424.A.3 (Area H) The Committees on Admissions and Financial Aid (CAFA), Diversity, Equity, and Inclusion (CODEI), Educational Policy (CEP), and Teaching (COT) have provided responses.

In the first March 2022 review, UC Santa Cruz unanimously and enthusiastically endorsed the addition of Area “H” in supporting the “increased development of diversity and equity as a core value to our state’s educational system in high schools, CSU’s and UC’s.” In this second review of this proposed Senate Regulation, CODEI, CEP and COT continue to strongly support the revised proposal put forth by BOARS in establishing Area H. CAFA members had more variation in their support and also what they identified as concerns. Our Senate Executive Committee (made up of chairs of all our major committees) also discussed the Area H proposal and the response was largely positive and supportive.

CODEI and COT raise questions regarding the oversight of approved courses for Area H and seek assurance that UC faculty will be part of the UC High School Articulation team. Likewise, CODEI points out, “currently BOARS oversees approval of courses for all the other A-G articulations, but the work of doing so is delegated to a small staff that makes up the UC High School Articulation Team. With adoption of Area H requirements, it is unclear who would determine and oversee approval for Area H courses as well. We gather this is not agreed upon yet at the systemwide or state level. Moreover, it is our understanding that there are still no state standards for ethnic studies (other state standards here).” CODEI notes concern that without this clarity, there is potential for a student to take a course that a) does not fit into any A-G requirements, b) does meet high school graduation requirements in ethnic studies, and c) does not “count” toward admission to UC.” We ask if this regulation is approved that there is further communication regarding how the review and oversight will be implemented.

As noted above, CAFA did not achieve consensus on the various aspects of the proposed Area H provisions. CAFA did agree that a well-designed ethnic studies class would be beneficial for California high school students. This opinion is tempered by the comment, “While some members feel that ethnic studies (ES) should be viewed as important as the current A-G requirements, other members raised issues concerning access and felt that an ethnic studies requirement should not be considered essential to students’ preparation for UC.” These concerns and points of disagreement fall into four large areas. First, members were in disagreement on whether Area H should be a *prerequisite* for success and whether it should be a *requirement* for UC eligibility. Here, some members suggested that it unnecessarily complicates requirements for admission in an already complex setting. Others observed that many non-California residents will not be held to the same expectations. Second, members were leery of the unintended consequences that could arise from implementation, such as additional costs to under-resourced districts. Third, the members questioned whether or not creating a whole new requirement was necessary, observing, “that there are other ways to achieve the goals of the Area H proposal – e.g., through campus GE requirements – that are more equitable and allow for greater quality control.” Fourth, and related to the previous point, members noted that Assembly Bill 101(2022),<sup>1</sup> requires all California students who graduate in the 2029-30 academic year, to have had at least a one semester course in ethnic studies. On this issue, members opined that “it is to the benefit of the students for the UC system to provide guidance on how to implement an effective ethnic studies course of sufficient quality.” That is, Area H could help to ensure that those courses required by AB 101 for graduation are of a high quality to adequately prepare students. This view of Area H complementing AB 101 was met with the viewpoint that AB 101 renders Area H moot. The complete response is included as an enclosure.

Despite our questions and concerns, however, UC Santa Cruz supports the proposal for Area H. We thank you for the opportunity to opine on this important proposed Senate Regulation.

Sincerely,



Patty Gallagher, Chair  
Academic Senate, Santa Cruz Division

Encl: CAFA\_ASCGallagher\_Second Review Area H\_20240503

cc: Laura Giuliano, Chair, Committee on Admissions and Financial Aid  
Gabriela Arredondo, Chair, Committee on Diversity, Equity, and Inclusion  
David Lee Cuthbert, Chair, Committee on Educational Policy  
Elisabeth Cameron, Chair, Committee on Teaching  
Raphael Kudela, Chair, Committee on Planning and Budget  
Matthew Mednick, Executive Director, Academic Senate

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<sup>1</sup> [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202120220AB101](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB101)

May 3, 2024

PATTY GALLAGHER, Chair  
Academic Senate, Santa Cruz Division

**Re: Second Systemwide Senate Review of Proposed Senate Regulation 424.A.3 (Area H)**

Dear Patty,

The Committee on Admissions and Financial Aid (CAFA) at the University of California, Santa Cruz appreciates the opportunity to comment on the revised proposal to add an Ethnic Studies/Area H requirement to the existing A-G requirements for University of California (UC) eligibility. The committee was not unanimous in any opinion but rather expressed a wide range of levels of support and concerns. While some members feel that ethnic studies (ES) should be viewed as important as the current A-G requirements, other members raised issues concerning access and felt that an ethnic studies requirement should not be considered essential to students' preparation for UC. We discuss the various viewpoints in more detail below.

On the question of whether an Ethnic Studies requirement would contribute to student preparation for UC, members are unanimous in their view that a well-designed ES class would be beneficial for our students. However, there is substantial disagreement on whether it is a *prerequisite* for success and should be a new *requirement* for UC eligibility. Several members argued that ES is essential, and on par with the subjects in Areas A-G with respect to preparing students for success at the UC. Others wondered whether the question of an ES requirement is rendered moot by Assembly Bill 101 (AB 101) enacted in 2021,<sup>1</sup> but agreed that in principle, an Area H requirement could improve the quality of the courses required by AB 101 for high school graduation and thereby improve student preparation. However, some members disagreed with the principle of requiring an Ethnic Studies course for UC admissions, noting that it unnecessarily complicates requirements for admission in an already complex setting, and that many non-California residents will not be held to the same expectations. Under the circumstances, some members argued that it makes little sense to view the course as a prerequisite for success at the UC. Further, one member notes that the case for making Area H a requirement has been made chiefly by the faculty of the ES program, that is, by the faculty developing the curriculum, rather than by faculty who would directly benefit from the student preparation. Other area requirements, such as Math and English, have broad support beyond the department developing the curriculum, with a broad range of UC faculty arguing that their students need to meet the requirements to succeed in their studies. The committee member would be far more favorable to the Area H requirement if other departments, not involved in Area H curriculum development, made a concrete case that mastery in Area H is needed for student success. Another member pointed out that the faculty appointed to the faculty working group come from various campuses and departments and even include members from the University of California, Office of the President (UCOP). One member argued further that the proposed Ethnic Studies curriculum is very political and California-centric, and that it is desirable for UC students to have diverse points of view. Another member pointed out that California is not mentioned in the

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<sup>1</sup> See: [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202120220AB101](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB101)

Rubric and that the learning outcomes promote critical and independent thinking rather than indoctrination of political viewpoints.

Some members raised several concerns about the costs and unintended consequences of a new Area H requirement, especially for under-resourced schools. Further, several members noted that there are other ways to achieve the goals of the Area H proposal – e.g., through campus GE requirements – that are more equitable and allow for greater quality control. Other members noted that ES will be required due to AB101 and that it's to the benefit of the students for the UC system to provide guidance on how to implement an effective ethnic studies course of sufficient quality.

Some main concerns that would need to be addressed for unanimity are those regarding access and implementation as follows:

- CAFA members expressed concern about adding more complexity to an already complex admissions process, noting that increases in complexity tend to favor privileged students who have the resources to help them navigate the process.
- Members share the concern expressed by an Associate Vice Chancellor<sup>2</sup> at the November 2023 BOARS meeting that high schools already struggling to implement AB101 compliant-courses by 2025-2026 – including both small, rural public schools as well as private/parochial schools with limited resources – would have even more difficulty with more restrictive standards imposed by Area H.
- In addition, CAFA is concerned about those schools who are already struggling with low A-G completion rates. CAFA worries that a new Area H requirement could further dilute resources needed to recruit high-quality teachers in hard-to-staff A-G courses.
- Several members also believe that a “non-additive” Area H requirement risks eroding the quality of existing A-G courses—particularly in Areas C (Mathematics) and D (Science). If the proposal were to move forward, CAFA strongly urges a revision that excludes these subjects from the set of possible courses that can be approved as Area H (Ethnic Studies). There is already widespread concern among faculty about students’ under-preparation in mathematics and science in recent years, due in part to the inadequacy of the two-year Area D requirement and to the proliferation of courses with limited coverage of advanced algebra (e.g., Introduction to Data Science) that were approved by UCOP as advanced mathematics under Area C.
- Relatedly, CAFA members question whether UCOP’s articulation staff has the capacity to ensure quality across A-G courses that are modified to satisfy Area H. Our concerns were amplified by some of the syllabi that were compiled by the articulation team and included in Appendix B as examples of “high school courses that would fulfill the proposed H requirement.” One syllabus that raised serious concerns is the Mathematics course titled “Am I an Ethnic Statistic?” – which appears to satisfy *neither* Area C *nor* Area H criteria. Despite being approved as a Mathematics course, the course materials do not include *any* mathematics references or textbooks. Descriptions of course units suggest that, instead of teaching students to use statistical methods, test hypotheses, and think critically when interpreting patterns in data (e.g., by learning to distinguish between correlation and causation), the instructor intends for students to interpret data with the goal of “demonstrating” a particular conclusion. For example: “This unit is a brief introduction to some of the statistics available that demonstrate

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<sup>2</sup> See: [https://senate.universityofcalifornia.edu/\\_files/committees/boars/boars-11-3-2023-minutes.pdf](https://senate.universityofcalifornia.edu/_files/committees/boars/boars-11-3-2023-minutes.pdf)

that your color does matter when it comes to mathematical achievements (stereotype threat).” Moreover, the very premise of the course as laid out in the first paragraph – that “students of color and girls consistently do worse in mathematics than white males ...” – is not only inaccurate; it also seems more likely to perpetuate stereotype threat than to counter it.

Sincerely

/s/

Laura Giuliano, Chair

Committee on Admissions and Financial Aid

cc: Amanda Rysling, Chair, Committee on Courses of Instruction (CCI)  
Gabriela Arredondo, Chair, Committee on Diversity, Equity, and Inclusion (CDEI)  
David Cuthbert, Chair, Committee on Educational Policy (CEP)  
Elisabeth Cameron, Chair, Committee on Teaching (COT)  
Onuttom Narayan, Chair, Committee on Privilege and Tenure (CPT)