



1156 HIGH STREET
SANTA CRUZ, CALIFORNIA 95064

Office of the Academic Senate
SANTA CRUZ DIVISION
125 CLARK KERR HALL
(831) 459 - 2086

March 21, 2022

Robert Horwitz, Chair
Academic Council

RE: Systemwide Review of Proposed Revisions to Senate Regulation 424.A.3

Dear Robert,

The Santa Cruz Division of the Academic Senate has completed its review of the proposed revisions to Senate Regulation 424.A.3, as proposed by the Board of Admission and Relations with Schools (BOARS) to create an ethnic studies Area “H” to the existing A-G requirements, with the Committees on Affirmative Action and Diversity (CAAD), Admissions and Financial Aid (CAFA), Educational Policy (CEP), and Teaching (COT) responding.

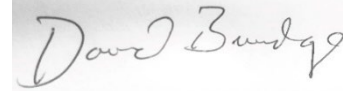
CAAD, CAFA, CEP and COT enthusiastically support this addition and the increased development of diversity and equity as a core value to our state’s educational system in high schools, CSU’s and UC’s. CAAD notes that the addition of the “H” requirement “encompasses the epistemological, methodological, and analytical approaches of ethnic studies while also acknowledging the inherent interdisciplinarity of the field.” COT further expands, “creating a non-additive half-unit (1 semester) Ethnic Studies requirement promotes the importance of ethnic studies, as well as communicating that Ethnic Studies is not optional, without being burdensome.”

CAFA had quite a lot to say about this proposed revision in their response, which will be included as an enclosure. Members of the committee want to ensure that there is equitable access to the Area H courses once they are developed. In order for this to be realized they highlight the importance of discerning between (1) the approved required criteria for the Community College (CC) transfer courses, (2) the statewide required high-school Ethnic Studies courses, and (3) the new Area H course requirement. Additionally, CAFA recommends that BOARS review the Area H course approvals 2 years before the deadline. CAFA’s rationale is, “If it looks like less-resourced schools aren't getting approved in time, there could be an extension of 2-3 years during which time students who have passed the state-approved Ethnic Studies course at the school would be deemed to have satisfied Area H until the real Area H course gets approved for that school.” Further, the committee recommends that students “who take a CC course that has been approved for the transfer Ethnic Studies requirement, either during high school or the summer after, could be deemed to have met Area H, at

least for a similar transition period, or possibly forever.” These recommendations are supported by detailed justifications outlining the concerns that gave rise to them.

On behalf of the Santa Cruz Division, I thank you for the opportunity to comment on this important revision to systemwide regulations.

Sincerely,

A handwritten signature in cursive script that reads "David Brundage". The signature is written in black ink on a light-colored background.

David Brundage, Chair
Academic Senate, Santa Cruz Division

encl: CAFA Response to Proposed Revision to SR 424.A.3, 03-14-2022

cc: David Smith, Chair, Committee on Admissions and Financial Aid
Kirsten Silva Gruesz, Chair, Committee on Affirmative Action and Diversity
Tracy Larrabee, Chair, Committee on Educational Policy
Catherine Jones, Chair, Committee on Teaching
Matthew Mednick, Executive Director, Academic Senate

March 14, 2022

DAVID BRUNDAGE, Chair
Academic Senate, Santa Cruz Division

Re: Systemwide Review of Proposed Revisions to Senate Regulation 424.A.3

Dear David,

The Committee on Admissions and Financial Aid (CAFA) has discussed and reviewed the proposed system wide revision of Senate Regulation 424.A.3. We would like to begin by saying that we enthusiastically support the creation of an ethnic studies requirement for undergraduate admission to the University by adding an Area H to the existing A-G requirements.

The course criteria support student learning outcomes that are in line with the intent of the ethnic studies requirement. We have confidence that such a requirement will have a profound impact on student success. In fact, we support the suggestion made by the Committee on Affirmative Action and Diversity (CAAD) that it might be time for a review of the framing and/or the application of the campus's own General Education requirement in Ethnicity and Race. Continuing to complement a student's education with a well rounded exposure to ethnic studies will continue to benefit our California residents in addition to international and out of state students who might not have a comparable training upon admission for reasons outside of their control.

Overview of Recommendations

CAFA recommends that supplemental documentation providing guidance towards satisfying the course criteria be provided. While the state of California has provided extensive documentation to support the state mandated ethnic studies criteria, it is not evident that satisfying the state's requirement provides sufficient conditions to satisfy the Area H course requirements. We wonder whether the proposed Area H guidelines provide the necessary detail to make UC's goals accessible and achievable by low resourced schools. Appropriate support will ensure goals are met and all students have equal opportunity to meet this requirement.

To help facilitate the development of Area H courses and to ensure equitable access across schools and districts, it would be helpful to identify the differences between:

- 1) The approved required criteria for the Community College transfer courses,
- 2) The statewide required high-school Ethnic Studies courses, and
- 3) The new Area H course requirement.

It could be particularly important to identify differences where expectations for Area H courses go beyond the statewide course requirements, if such cases exist. This will help to create the necessary road map that K-12 schools can follow to ensure their efforts are not in vain and meet Area H requirements from the beginning.

The Area H criteria contain a lot of language that requires some domain knowledge to understand. Some concrete examples provided in additional documentation would be helpful -- in particular, the supplementary documentation should refer explicitly and repeatedly to particular materials in the statewide guidelines (<https://www.cde.ca.gov/ci/cr/cf/esmc.asp>) to show which components and examples are appropriate for Area H standards and whether any topics and activities are necessary and desired that are not in the statewide guidelines at all (see details below). The supplementary guidelines should be made with the participation of both the expert University of California faculty and non-expert high school teachers and administrators who are already familiar with the state guidelines.

Another necessary consideration to ensure that the Area H requirement is met in the way intended is that the criteria are correctly applied to proposed courses for approval. For that reason, we also think it is essential that the University of California Office of the President (UCOP), who will be approving all Area H courses, have an opportunity to provide feedback on whether the document as it stands will enable them to judge course proposals adequately. CAFA also wonders whether UCOP needs to hire a staff member who is an expert in ethnic studies.

To ensure no districts are left at a disadvantage we recommend the following:

- 1) That UCOP and Board on Admissions and Relations with Schools (BOARS) be asked to review the status of Area H course approvals about 2 years before the deadline (i.e. 2028). If it looks like less-resourced schools aren't getting approved in time, there could be an extension of 2-3 years during which time students who have passed the state-approved Ethnic Studies course at the school would be deemed to have satisfied Area H until the real Area H course gets approved for that school. This means students don't have to suffer for their school having not worked through the University of California process.
- 2) Students who take a CC course that has been approved for the transfer Ethnic Studies requirement, either during high school or the summer after, could be deemed to have met Area H, at least for a similar transition period, or possibly forever.

Supporting Justification

To support all our recommendations above we elaborate on our concerns below.

By California state mandate, K-12 schools will have until 2030 to integrate ethnic studies into their curriculum, either by integrating material into current courses or creating standalone courses. However, the learning outcomes and criteria outlined for Area H cannot be easily identified in the documentation provided by the California Department of Education (CDE), and University of California faculty may desire components that are not there at all. We see components spread throughout the 6 chapters of that documentation. For example, in Ch. 1 under “Guiding Values and Principles of Ethnic studies” and “Eight Outcomes of K-12 Ethnic Studies Teaching,” we see similar language. However, some of the more specific criteria of the new Area H appear in the sample lessons in Chap. 4, which are in the form of suggestions. Theory of racial construction is briefly suggested in Ch. 3 pg. 30 but not mandated. Even looking at the course criteria provided by the state of California for a stand-alone ethnic studies class (Chap. 3 pg. 31), it’s difficult to see where the criteria align or deviate. This is partly made difficult by the expert language used and our committee’s lack of expertise in this area; but high-school teachers and administrators, and UCOP staff, may share a similar lack of expertise and need the guidance on the alignment between the Area H standards and the statewide guidance for Ethnic Studies even more.

It is clearly stated in the documentation provided by the CDE that site and district administrators should be proactive in gathering necessary resources to ensure proper development of new courses or redesign of courses to meet the ethnic studies requirement. Chap. 2 entitled “District Implementation Guidance” provides guidance to district and site administrators to guide implementation of the ethnic studies requirement. In this chapter administrators are asked to undertake tasks such as to “identify teachers who are willing and committed to invest in developing an ethnic studies curriculum and pedagogy,” “consult with other districts...that have implemented ethnic studies programs at the high school level,” and assemble a team to do the work with members that have “appropriate professional training on curriculum development.” It is unclear if all schools will have access to the necessary expertise. The CDE clearly understands that in order for ethnic studies to be incorporated successfully and appropriately, it will require expert guidance but finding such experts, again, is the responsibility of the school itself. CAFA is concerned that this lack of dedicated state resources to support schools in this transition will create inequities among school districts. While the University of California can’t do anything about that, we should be particularly careful not to aggravate these inequities, hence our recommendation for a guidance document to help steer schools specifically from the statewide Ethnic Studies guidelines toward meeting the Area H requirements.

Chap. 2 of the state guidelines states that K-12 schools and administrators should develop a process for evaluation of the courses developed and supported through high-quality ethnic studies professional learning (Chap. 2 pg. 9). As a consequence, there are currently no reference guidelines for assessment or evaluation of new or revised curricula provided by the state to further help create a roadmap between California requirements and Area H requirements. We also suspect that this means different schools may have different criteria to be met. This is further supported when administrators are asked to “develop a definition of what ethnic studies means to [their] district” (Chap. 2 pg. 3).

The California ethnic studies model curriculum provides some curricula of existing approved A-G required courses. However, there are no learning outcomes provided for these courses. It is unclear if even these courses under the title “ethnic studies” satisfy all the criteria laid out for Area H. Those courses would need to be reviewed again and revised if necessary to meet the Area H requirement.

We admire the value given to ethnic studies as an essential element of a student’s education and more just society. In fact, it would be great if such an education were integrated into the entire K-12 curriculum, where fitting. Certainly, the new Area H criteria will force K-12 schools to meet a certain level of standard. We want to ensure there is a clear path to achieve this.

Sincerely,

/s/

David Smith, Chair

Committee on Admissions and Financial Aid

cc: Tracy Larrabee Chair, Committee on Educational Policy
Kirsten Silva Gruesz, Chair, Committee on Affirmative Action and Diversity
Yat Li, Chair, Committee on Courses of Instruction
Catherine Jones, Chair, Committee on Teaching