



Feasibility Study: College Promise Programs

Recommendation from the Office of California Cradle-to-Career Data System

This proposal seeks to have the Office of California Cradle-to-Career Data System (Office) establish a consistent definition and collect information on the individuals who benefit from College Promise programs. This request has a significant cost and an unclear value regarding access to actionable information.

The Office recommends that it support efforts led by interested data providers to identify the rationale and requirements for evaluating College Promise programs. Some of the data in this proposal is not currently collected by data providers. Should the Governing Board (Board) want to consider allocating more resources to implementing these ideas, they may request the Office to develop more specific estimates of financial and administrative cost for collecting the new variables.

Background

In 2025, Data and Tools Advisory Board (DTAB) members Myrtha Ortiz Villar and Diana Phoung submitted a proposal to update the definition for College Promise programs in the California Cradle-to-Career Data System (C2C) analytical data set. The full text of the proposal can be found at [this link](#).

When conducting feasibility studies, the Office considers four factors: data availability, data reliability and data validity, cost, and compliance. Information on each aspect is included below.

Potential Approaches to Data Access

There are three ways that this proposal could be addressed:

Option 1: Conduct an analysis through the research request process

California K-12 local education agencies (LEA) that want information about the outcomes of students who participated in College Promise programs while in high school could conduct a research study using the C2C data request process. If approved by the postsecondary agencies, the LEA would provide identifiers for their students and the Office would match these records to the C2C analytical data set. Then, researchers at the LEAs could determine students' longer-term outcomes or compare them to students who did not receive this type of support. This analysis could also be requested by a research organization that is working in partnership with LEAs.

Option 2: Establish a common definition for College Promise programs

This option focuses on creating a consistent definition for the types of programs that count as College Promise. The current definition for the C2C analytical data set refers to tuition waivers, even though College Promise programs may include other components like guaranteed admissions, tutoring services, or career advising. The Office could use its role as a convenor to partner with other agencies to create a common definition or create a list of options that a data provider could choose from as part of the file specification process. Once a common definition or list of options is established, the Office could help socialize the consistent definition. For example, staff could post a plain language definition on the C2C website and work with community partners to disseminate this information.

Option 3: Create a new data point that documents whether individuals are participating in a College Promise program

The current College Promise data point is defined at the institutional level, indicating whether a community college or four-year institution offers a College Promise option. However, because information is not tracked at the individual level, it is not possible to know which students benefited from the support.

In addition, both K-12 and postsecondary institutions need to provide student-level information to evaluate the impact of College Promise programs. This option would require that each local education agency and college begin

tracking which students are participating in College Promise programs and report this information to the relevant state agency. It would also require the California Department of Education (CDE), California Community College Chancellor's Office (CCCCO), California State University (CSU), and University of California (UC) to collect this information each year.

Data Availability

Data Sources and Historical Range: *Where the data originates from and the span of years for which data are available.*

CCCCO, CSU, and the independent colleges indicated in the Participation Agreement that they will provide data to the Office on whether colleges associated with their systems offer a College Promise program. However, the Office has not yet worked with the data providers to create file specifications for College Promise programs and no information has been submitted. This work has not yet been scheduled.

Currently, none of the data providers ask educational institutions to report on College Promise programs at either the institutional or individual level, so new state-level data collection would be needed.

Future Relevance and Data Availability: *Evaluate whether the new data will remain useful as the analytical dataset evolves and if the information is likely to be collected in the future.*

Local programs that address both the cost of college and provide wrap around supports are important tools for college access. Therefore, it may be valuable to document the impact of College Promise programs and whether their scope and impact changes over time.

However, data providers do not currently collect information on College Promise programs.

Data Reliability and Data Validity

Institutional Variability: *Whether there are variations in administrative practices and data recording across institutions at the local level.*

Because College Promise programs are local in nature, their definitions vary across institutions. In addition, the specific components of College Promise programs may evolve over time, so if the data included in the C2C analytical data set becomes more granular, agencies will need to track which components are being implemented on an annual basis.

Agency Variability: *Data and metric definitions across various agencies follow a uniform format and standard.*

Definitions vary across agencies. For example, K-12 programs focus more on admissions and college selection while college programs focus more on services that encourage persistence and completion.

Data Integration Across Agencies: *The Office's ability to consolidate data from multiple agencies.*

At the institutional level, once a definition is established and data providers begin to share information using those specifications, the Office will be able to provide information about which institutions offer College Promise programs.

Similarly, if data providers share individual-level data, the current matching process would allow for information on College Promise program participation to become a characteristic for each student. Therefore, it would be possible to conduct analyses on the milestones and outcomes that students achieve.

Cost

Startup Costs: *Costs to provide access including both direct costs and associated staff time for the Office and its data providers.*

To create consistent definitions, Office staff could use the file specifications process to engage with data providers to create a list of characteristics

associated with College Promise programs. This could be done through direct conversations with providers, or the Office could convene a task force to recommend definitions. This activity would need to be integrated into a future work plan and weighed against other priorities, such as establishing definitions for health and human services or early childhood data points.

To begin collecting information on individuals in College Promise programs, the costs would be significant. LEAs and postsecondary institutions would have to devote time and resources to identifying which students are participating. They would also need to amend their local data systems to allow them to track this information. Finally, they would need to devote time to uploading the information to the state level data systems maintained by CDE, CCCCCO, and CSU.

Startup processes for the data providers would also be significant. They would need to amend the data structure of their information systems, develop guidance documents regarding how to report this information, host training for LEAs and postsecondary institutions regarding new requirements, and validate the new information. Generally, focused attention is required for three years to develop, explain, collect, and ensure the quality of new data points.

Ongoing Costs: *Costs necessary to maintain collection of the stated data elements for the Office and data providers.*

Once the data definition is established and data are uploaded, there will be minimal costs for the Office.

There will be ongoing costs for data providers to capture information on the characteristics of College Promise programs offered by LEAs and colleges each year.

There will be an ongoing cost for LEAs and colleges to track who is participating in College Promise programs and to report this information each year to the relevant agency.

Compliance

Legal Requirements: *Compliance with privacy laws, intellectual property rights, and any other relevant regulations.*

There are no legal concerns regarding creating a consistent definition or sharing information on an individual's participation in a College Promise program.

Scope: *Whether the proposal is consistent with the scope of work that is described in the Cradle-to-Career Act.*

The [initial legislation](#) included a requirement that the planning process create recommendations for “a means of developing common data definitions and additional data elements necessary for partner entities to collect for future linkage to the data system.” During the planning process, this was addressed by convening a subcommittee that examined how each data provider currently collects information on a given data point and then assessing that data point for quality before determining whether to include it in the initial C2C analytical data set (see the [December 2020 report to the legislature](#)).

Office staff follow a similar process to develop file specifications with each data provider. However, there is not currently a process for convening partners to align definitions. For example, after the planning process was complete, questions arose about the Office establishing a consistent definition for teacher residency programs. The decision on how to make the definition more precise has been made by the Commission on Teacher Credentialing (CTC), not by the Office. Similarly, a task force that the Office convened to create a consistent definition for earnings was inconclusive and therefore the Office staff developed a formula that is not aligned with any specific agency calculation.

Neutrality of the Office: *Whether the proposal might jeopardize the Office's neutral stance.*

As a neutral body, the Office's role is to provide documentation on the information included in the C2C analytical data set, as specified by data providers. In instances where definitions vary across agencies, the Office

generally creates unique data points that focus on the differing approaches. For example, when determining whether an individual is low income, CDE provides a student's socioeconomic status, which includes factors like parental education and access to free and reduced price meals. Colleges, on the other hand, report whether students received financial aid. Having the Office establish a consistent definition would not be in keeping with its current role.

Suppression and Regulatory Feasibility: *The impact of compliance policies on access to data based on the Office's data suppression policy and other regulatory concerns such as reidentification risks.*

This proposal can be implemented using the current data suppression policies and does not pose a risk to regulatory issues such as reidentification.