
CONSENT

Bill No: AB 1636
Author: Solache (D)
Amended: 7/2/26 in Senate
Vote: 21

SENATE EDUCATION COMMITTEE: 7-0, 7/1/26

AYES: Pérez, Ochoa Bogh, Cabaldon, Choi, Cortese, Gonzalez, Reyes

SENATE APPROPRIATIONS COMMITTEE: Senate Rule 28.8

ASSEMBLY FLOOR: 74-0, 5/21/26 - See last page for vote

SUBJECT: Cerritos Community College District: data sharing

SOURCE: Cerritos College

DIGEST: This bill requires the Cerritos Community College District (CCD), in consultation with the California Community Colleges Chancellor's Office (CCCCO), by April 1, 2027, to develop a recommended prototype for Cerritos CCD to compile and transmit personally identifiable student information to the CCCCCO for the limited and express purpose of creating a student record for enrollment in credit coursework at the California Community Colleges (CCCs).

ANALYSIS:

Existing law:

- 1) Establishes the CCCs, a postsecondary education system in this state, under the administration of the Board of Governors (BOG), and specifies that the CCC system consists of CCDs. (Education Code (EC) § 70900)
- 2) Requires the governing board of a CCD to admit to the CCC any California resident, and may admit any nonresident, possessing a high school diploma or its equivalent. (EC § 76000)

- 3) Requires the BOG to adopt regulations that permit the governing board of a CCD to allow applications for admission, student residency determination forms, and other documents to be submitted electronically, and requires that applicants and students be informed of the relative security of the information they submit electronically. (EC § 70901.1)
- 4) Requires every CCD be under the control of a governing board, and requires the governing board of a CCD to establish, maintain, operate, and govern each CCC within their district in accordance with law. (EC § 70902)
- 5) Establishes the Information Practices Act and declares that the right to privacy is a personal and fundamental right protected by Section 1 of Article I of the Constitution of California and by the United States Constitution and that all individuals have a right of privacy in information pertaining to them. (Civil Code § 1798 and 1798.1)
- 6) Establishes the Family Educational Rights and Privacy Act (FERPA), which protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. (20 United States Code § 1232g; 34 Code of Federal Regulations Part 99)
- 7) Provides, pursuant to the California Constitution, that all people are by nature free and independent and have inalienable rights. Among these is the fundamental right to privacy. (California Constitution Article I, § 1)

This bill:

- 1) Requires the Cerritos CCD, in consultation with the CCCCCO, by April 1, 2027, to develop a recommended prototype for Cerritos CCD to compile and transmit personally identifiable student information to the CCCCCO for the limited and express purpose of creating a student record for enrollment in credit coursework at the CCCs.
- 2) Requires Cerritos CCD to compile and transmit the personally identifiable student information to the CCCCCO in a manner that complies with all applicable state and federal privacy laws, for the specified method, and permits the specified method to use existing system capabilities used to create a student record at the CCCs.

- 3) Requires the Cerritos CCD, in consultation with the CCCCCO, (1) to identify the minimum amount of personally identifiable student information required to be compiled and transmitted by Cerritos CCD to create a student record for course enrollment at the CCCs, and (2) to make recommendations on how the data should be collected, transmitted, and stored to best protect student data and adhere to data privacy standards.
- 4) Requires the Cerritos CCD, in collaboration with the CCCCCO and the California Department of Education (CDE), to include a proposed form or process as part of the recommended prototype to obtain informed consent from participating students, and when required by law, a parent or guardian.
- 5) Requires the specified form or process to include, but not be limited to, the following:
 - a) A description of the program, including its status as a pilot and its purpose as an application process specifically for CCCs.
 - b) How the pilot application process differs from CCCApply and CCCStart.
 - c) How student data will be handled at all stages of the process, including acquisition, transmission, and storage.
- 6) Requires the CCCCCO, by September 1, 2027, to review and approve the Cerritos CCD's recommended prototype.
- 7) Requires the CCCCCO to approve the Cerritos CCD's recommended prototype unless the CCCCCO determines, based on specific written findings, that a specific element of the recommended prototype is inconsistent with this bill or cannot be implemented due to an identified legal or technical deficiency.
- 8) Permits the Cerritos CCD to submit a revised recommended prototype addressing the identified deficiencies, and requires the CCCCCO to complete review and approval of the revised recommended prototype on or before September 1, 2027.
- 9) Permits the governing board of Cerritos CCD, upon approval of the CCCCCO of the recommended prototype, to enter into a data sharing agreement with the governing board of a partnering local educational agency (LEA) to exchange

personally identifiable student information, as specified, for the limited and express purpose of creating a student record for course enrollment at the CCCs.

- 10) Requires the personally identifiable student information exchanged under a data sharing agreement (1) to be compiled and transmitted by Cerritos CCD to the CCCCCO using the recommended prototype and (2) to only be used by Cerritos CCD and the CCCCCO for the limited and express purpose of creating a student record for course enrollment at the CCCs.
- 11) Requires the data sharing agreement to include a requirement for an LEA to obtain the express written consent of a student who is at least 18 years old or a student's parent or guardian to exchange the personally identifiable information pursuant to the data sharing agreement.
- 12) Requires, by January 1, 2031, Cerritos CCD, in consultation with the CCCCCO, to submit a report to the Legislature on the effectiveness of these provisions in accomplishing the purpose of providing seamless enrollment of participating students of a partnering LEA in courses offered by Cerritos CCD.
- 13) Defines "partnering local educational agency" as a school district, county office of education, or charter school that meets both of the following: a) has a partnership with Cerritos CCD as authorized through a College and Career Access Pathways partnership or the California College Promise, and b) is geographically located within the service area of Cerritos CCD.
- 14) Repeals these provisions on January 1, 2032.

Comments

- 1) *Need for the bill.* According to the author, "For high school students within the Cerritos Community College District service area, the existing CCCApply process can add unnecessary friction. Students may be required to re-enter information already captured in K–12 systems, and the application process can delay the point at which Cerritos College is able to provide advising, financial aid support, orientation, and enrollment preparation. AB 1636 authorizes Cerritos College to enter into seamless access to community college data-sharing agreements with eligible local educational agencies in its service area. These agreements must be approved by both governing boards in public meetings and must comply with applicable state and federal privacy laws."

2) *The current CCC application process through CCCApply and commonly held concerns.* CCCApply was launched in 2011-12, and it allowed potential students to apply for admission to any CCC through a common online application. A prospective CCC student must undergo a two-step process:

- First, create an online profile to apply through OpenCCC, which includes providing personally identifying information, such as your name, email address, home address, phone number, and Social Security Number or Taxpayer Identification Number. Once the profile is established, a student receives a statewide student record called a CCCID.
- Second, after receiving a CCCID, a student can apply to a CCC through CCCApply, and they are prompted to fill out a maximum of 203 data points—and not all of which are required for every student—to help determine a student’s overall education status, if a student is eligible for financial aid, if a student requires basic needs services, and/or the type of program the student is applying to attend.

The entire application can take an hour to complete, on average. After applying and registering for the CCC, the student is then able to enroll in coursework and begin the process of orienting themselves as a CCC student.

A February 2021 web post from the Academic Senate for the California Community Colleges (ASCCC) highlighted several commonly held concerns with CCCApply at the time, including: a) the length of time it takes to complete the application (an average of 45 minutes per application as of 2018), b) inconsistencies in the application across colleges because each college can set its own application requirements, and c) requiring a dual enrollment student to complete a CCCApply application a second time if they want to register and enroll at a CCC. This bill intends to allow Cerritos CCD to work with certain K-12 students to bypass the CCCApply process to register for credit courses, and the author indicates that the length of the application was a key factor in putting forward this bill.

AB 3101 (Carrillo, Chapter 553, Statutes of 2018) sought to address concerns about an overly lengthy CCCApply process. AB 3101 required the CCCCCO to revise CCCApply such that only data required by the federal and state law, or that is otherwise deemed necessary by the Chancellor, is collected during the process. AB 3101 also exempted a student seeking to enroll exclusively in noncredit courses from CCC residency classification requirements, which was anecdotally reported to have significantly shortened the noncredit application.

- 3) *The CCC system is now replacing CCCApply with CCCStart.* The CCCCO currently is leading an initiative called “Reimagine Apply”, which is a statewide effort to create a new application system, called CCCStart, largely to address fraud prevention. The new system is intended to be a clearer, single application with fewer, smarter questions and meant to create less confusion as logic-driven paths in the application will adjust to a student’s situation. According to the CCCCO, students should be able to get through CCCStart more quickly than CCCApply, and there should be a 20% to 60% reduction in the number of questions, depending on the student’s journey type (i.e., noncredit, credit, international, or dual enrollment) and a student’s answers to questions.

The plan is for CCCStart to go live for the first wave of 11 districts in June 2026, and will be rolled out with three additional waves, with all districts to have at least begun to adopt the new application system by January 2027. The current timeline for CCCApply to be phased out is by the end of June 30, 2027. The timing of this bill is such that it seeks a technological solution through CCCApply, even as that system is expected to be phased out by the middle of 2027.

- 4) *This bill seeks to automate CCC admission and registration for credit courses for certain K-12 students, but some answers will still need to be provided by students.* This bill requires the CCCCO to create a tool to allow certain K-12 students in Cerritos CCD’s service area to bypass the current CCCApply process to expedite their registration for credit courses. According to Cerritos CCD, they aim to replicate a process that they use to create a batch of student records for noncredit students—effectively bypassing CCCApply—and this process is operated through a collaborative partnership between Cerritos CCD, participating LEAs, and the CCCCO. This process leverages existing technology known as the Multi Account Creation Tool, which was released statewide in 2024 and was originally intended to register incarcerated students who did not otherwise have access to OpenCCC to create a CCCID.

Though LEAs would have access to the majority of the student information needed to complete CCCApply, an LEA may not have every required data point, and certain information—such as residency-related information and major—may need to be provided directly by the student or parent/guardian to Cerritos CCD. According to Cerritos CCD, in these situations, the LEA would provide the student data to Cerritos CCD that it has authority to share through a data-sharing agreement, and Cerritos CCD would then securely collect any

remaining required information directly from the student through a consent-based process.

According to Cerritos CCD, once the LEA-provided data and any necessary student-provided information are complete, Cerritos CCD would transmit the information to the CCCCCO as part of the secure batch upload process.

- 5) *Questions about the batch upload process.* According to Cerritos CCD, using the noncredit batch upload process, they have been able to generate CCCIDs and bypass the CCCApply process for students registering for noncredit coursework, and through this bill, Cerritos CCD seeks to create a comparable credit batch upload process tool to register K-12 students at the CCCs. However, it is unclear if a credit batch upload process tool would be able to bypass CCCApply as expeditiously because the credit application can be significantly longer and more involved than the noncredit application. This is largely attributable to questions on residency and educational goals on the credit application. Because of underlying differences between the credit and noncredit application, it is unclear if the additional resources needed to create this tool would be marginal or substantial.

Related and Prior Legislation

AB 731 (Fong, 2025) would have made various changes to the College and Career Access Pathways (CCAP) program, including the authorization of a single application for student participation, permitting the use of an online platform, and modifying CCAP reporting requirements to include additional outcome measures. This bill was held in the Senate Appropriations Committee.

AB 3101 (Carrillo, Chapter 553, Statutes of 2018) requires the CCCCCO, by July 31, 2019, to revise the CCC online application process, known as CCCApply, so that only data that is required by the federal government, state law, or that is otherwise necessary, as determined by the CCCCCO, is collected during the process. AB 3101 also exempted a student seeking to enroll exclusively in noncredit courses at a CCC from CCC residency classification requirements.

FISCAL EFFECT: Appropriation: No Fiscal Com.: Yes Local: Yes

SUPPORT: (Verified 8/3/26)

Cerritos College (source)
ABC Unified School District
City of Norwalk
Downey Unified School District

Norwalk La Mirada Unified School District
Western Association for College Admission Counseling

OPPOSITION: (Verified 8/3/26)

None received

ASSEMBLY FLOOR: 74-0, 5/21/26

AYES: Addis, Aguiar-Curry, Ahrens, Alanis, Alvarez, Ávila Farías, Bains, Bauer-Kahan, Bennett, Berman, Boerner, Bonta, Bryan, Calderon, Caloza, Carrillo, Castillo, Connolly, Davies, DeMaio, Dixon, Elhawary, Ellis, Flora, Fong, Gabriel, Gallagher, Gipson, Jeff Gonzalez, Mark González, Hadwick, Haney, Harabedian, Hart, Hoover, Irwin, Jackson, Johnson, Kalra, Krell, Lee, Lowenthal, Macedo, McKinnor, Muratsuchi, Nguyen, Ortega, Pacheco, Papan, Patel, Patterson, Pellerin, Petrie-Norris, Quirk-Silva, Ransom, Michelle Rodriguez, Rogers, Blanca Rubio, Sanchez, Schiavo, Schultz, Sharp-Collins, Solache, Soria, Stefani, Ta, Tangipa, Valencia, Wallis, Ward, Wicks, Wilson, Zbur, Rivas

NO VOTE RECORDED: Arambula, Chen, Garcia, Lackey, Ramos, Celeste Rodriguez

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