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University of San Francisco

**Collateral Damage: How Expanding Public Charge Policy  
Influences Adult ESL Enrollment**

A Thesis Presented to  
The Faculty of the School of Education  
International and Multicultural Education Department

In Partial Fulfillment  
of the Requirements for the Degree  
Master of Arts in Teaching English To Speakers of Other Languages

By  
Allison M. Eckert  
December 2021

# **Collateral Damage: How Expanding Public Charge Policy Influences Adult ESL Enrollment**

In Partial Fulfillment of the Requirements for the Degree

MASTER OF ARTS

in

TEACHING ENGLISH TO SPEAKERS OF OTHER LANGUAGES

by

Allison M. Eckert

December 2021

UNIVERSITY OF SAN FRANCISCO

Under the guidance and approval of the committee, and approval by all the members, this field project has been accepted in partial fulfillment of the requirements for the degree.

Approved:

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Instructor/Chairperson

December 9, 2021

Date

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## ABSTRACT

This thesis explores United States federal public charge policy from its inception, focusing on the expansion of the public charge test under the Trump administration, which made it easier for low-income immigrants to be barred from entry into or continued residence in the country based on their low socioeconomic status. This policy change caused eligible immigrants to avoid state-funded services such as public benefits en masse out of fear of deportation, family separation, and other adverse immigration consequences. This kind of avoidance of benefits use is called a “chilling effect,” and immigrants’ use of community services and means-tested benefits showed significantly chilling as a result of public charge policy changes.

To help contextualize the findings, a literature review covering the following themes was conducted: historical inadmissibility policy, changes to the public charge rule during the Clinton and Trump administrations and how they affected immigrant communities, under-enrollment in public benefits among eligible immigrants, public charge policy as an example of Social Reproduction Theory, and the removal of the expanded public charge rule in 2021.

This study analyzed 2015-2019 enrollment records for adult ESL programs from all California community colleges to determine whether they included evidence of chilling. I found that public charge changes did not significantly chill participation in community college ESL program-wide; however, three subcategories of students did display significant chilling in 2016 and 2018. Hispanic ESL students; ESL students of color, more generally; and low-income ESL students all demonstrated significant chilling in these years, mirroring previous findings that showed these groups were more likely than others to avoid services due to public charge fears.

## CHAPTER I INTRODUCTION

### Statement of the Problem

In October 2018, Donald Trump's Department of Homeland Security published an enhanced version of an obscure immigration law called the public charge rule, which dates back to the 1880s and has the power to exclude or even expel immigrants from the country. Beginning with his administration's mere threat of expanding the public charge law in 2017, and continuing through the adoption of the expanded new rule in 2019, Trump's expansion of U.S. inadmissibility policy had wide-ranging and harmful effects on immigrant communities.

The public charge rule is a federal statute that allows immigration officials to put potential immigrants to the United States (such as people visiting the country, applying for visas, or seeking a change in status to legal permanent residency or citizenship) to a "public charge test" in order to determine whether or not they are likely to be dependent on the U.S. government for their subsistence (Barofsky et al., 2020). In essence, anyone who is determined by immigration officials to be a likely "public charge," meaning a foreign-born person with limited means whose livelihood must be substantially supported by U.S. public monies, is subject to denial of entry into, or even deportation from, the country.

Prior to Donald Trump's tenure in the White House, newcomers subject to public charge-based denials of admittance into the United States were limited to those who were "likely to become *primarily dependent* on the government for support" (emphasis my own) and that



“primary dependence” had definite bounds (Immigrant Legal Resource Center, 2021, p. 3). Per the Immigrant Legal Resource Center (2021)’s primer on immigrant inadmissibility prior to Trump’s expansion of the public charge test, “primary dependence” had long been understood to imply one of two things: either “reliance on public cash assistance” or “long-term institutionalized care paid for by the government” (p. 3).

Traditionally, public charge policy was only relevant in cases involving foreign-born people (1) receiving in-cash assistance from the U.S. government (an example is the cash-based Temporary Assistance for Needy Families (TANF) program, also known as “welfare”), or (2) requiring government-funded institutionalization, such as residence in a nursing home or mental health institution (Makhlouf & Sandhu, 2020, p. 6). Per Bernstein et al. (2019), Trump’s expanded rule widened the purview of public charge policy: for the first time, immigrants could be denied admission into the United States or face deportation if they participated in virtually any public assistance program, whether it be an *in-cash* program (a criterion upheld from previously established federal guidance) or, for the first time, an *in-kind* benefit (such as relying on government-subsidized food purchases, health insurance, housing, etc.).

In government literature, these kinds of anti-poverty public assistance programs are often called “means-tested benefits,” meaning that in order to be eligible to receive the assistance, a recipient must have very limited means, usually defined as having an income level near or below the federal poverty line for their household size. Colloquially, we know these benefits as “safety-net” programs meant to brace low-income households against a fall into abject poverty. Under President Trump, immigration officers were invited to red-flag applicants who used any of an expanded array of safety-net programs, such as people receiving federal food aid (e.g., the

Supplemental Nutrition Assistance Program (SNAP), which was formerly known as Food Stamps); subsidized medical insurance (e.g., Medicaid, Medicare); subsidized housing (e.g., Section 8 housing); and more (Fix & Capps, 2017).

Accordingly, it was suddenly easier than ever before for immigrants to be labeled “public charges” deemed too poor to be legally allowed to stay in the United States. Not only would the revised policy blacklist immigrants’ use of a wider array of safety-net programs than it had at any time in the past, but the updated public charge policy would also be applicable to a broader pool of immigrants. This pool included, as one might expect, undocumented immigrants, but it also extending to people residing in the United States legally, such as the foreign-born spouses of U.S. citizens, current green card holders, and people holding U.S. visas for purposes such as travel, study, or work (Fix & Capps, 2017). As a result of this novel interpretation of “public charge,” participating in safety-net programs could threaten any members of these groups’ entry into (or continued residency in) the country (Bernstein et al., 2019, p. 1).

Public charge policy governs who is allowed to enter and stay in the United States, but the expansion of the public charge test launched a cascade of consequences among immigrant communities that were unrelated to migration itself. Per Makhoul and Sandhu (2020), participants’ disenrollment from or forgone enrollment in government services for which they are eligible is called a “chilling effect.” Members of immigrant communities—including noncitizens, permanent legal residents, naturalized citizens, and the U.S.-born children of adult immigrants—have all demonstrated “chilling” in response to the new, broader legal definition of “public charge” (Bernstein et al., 2019, p. 1). Although the federal government would not officially promulgate Trump’s new rule until August 2019, leaked government documents, the

spread of misinformation, and clamorous media attention to the issue of inadmissibility policy induced a significant chilling effect among immigrants starting well in advance of the rule's adoption (Barofsky et al., 2020, p. 1760). Per Bernstein et al. (2019), one in every seven adult immigrants in the United States reported chilling starting in 2018, and these chilling effects were yet more common among low-income immigrant households, including among citizen children living with immigrant guardians. In a society where 96% of children under six years of age live with at least one foreign-born parent (Hester et al., 2018, p. 6), this change in policy and its harm to low-income immigrants struggling to provide for their families cannot be ignored.

Just as chilling effects have been reported among people who would seem, at first glance, unlikely to be affected by changes in inadmissibility policy (people such as U.S. citizens), immigrants' participation in public benefits programs *not* subject to public charge evaluation has also chilled in response to this policy change. Participation rates for services that remained irrelevant to public charge determination, such as nonprofit-led food pantries and education services for K-12 public school students, declined due to immigrants' overgeneralized fear of using any government service at all (Bleich & Fleischhacker, 2019). Not only was chilling stemming from the new rule reported among low-income immigrant households lately enrolled in safety-net programs newly subject to the public charge test (programs such as SNAP and Medicaid), but it also occurred among households *not* enrolled in these kinds of programs (Barofsky et al., 2020). Chilling extended even to families who had historically only used services located within bedrock community institutions (e.g., public schools, clinics, and nonprofit organizations) and who were never eligible for safety-net services in the first place (Barofsky et al., 2020). We can see that immigrant families' misunderstanding and fear of the

purview of the new public charge test and its potential consequences drove widespread under-enrollment in myriad government-funded services (Barofsky et al., 2020). Families feared that their participation in government-funded and other public programs might threaten their path to legal permanent residency in the United States, or it could even result in deportation or family separation, and indiscriminate chilling was the result (Bleich & Fleischhacker, 2019).

Bernstein et al. (2019) showed that at least 14% of immigrants declined participating in safety-net and/or educational services for which they were eligible in the wake of the new rule and that this chilling affected all types of programs for immigrants; however, as yet, there have been no studies of the potential chilling of English as a Second Language (ESL) program participation. Bleich and Fleischhacker (2019) reported that education services for low-income families—for example, healthy cooking and nutrition classes funded by SNAP-Ed dollars—likely chilled due to concerns about public charge policy. It stands to reason that participation in public ESL education, which is another government-funded service not subject to the expanded public charge test, may also show chilling due to overgeneralized avoidance of any benefits perceived by fearful immigrants to carry a public charge threat.

Due to the lack of analysis of ESL program enrollment rates with an eye toward how changing inadmissibility policy may have affected immigrant communities *before* (from Trump's election up to the January 2017 leak of executive-branch documents about public charge expansion), *during* (from January 2017 until the new rule's planned promulgation in August 2019), and *after* the new rule was to take effect (from August 2019 on), it is not yet known whether ESL programs experienced chilling. This study aims to be the first to find out whether

participation in ESL programs among adult immigrants may have chilled during the Trump's administration's revamp of public charge-based denials and deportations.

### **Background and Need for the Study**

Knowing if, and to what extent, public charge rule changes leaked in 2017, announced in 2018, and promulgated in 2019 affected ESL enrollment will help researchers, Teaching English to Speakers of Other Languages (TESOL) practitioners, and policymakers begin to understand the effects that federal immigration law changes can have on adult ESL students. This study is needed because scholarly investigations of the ramifications of the expanded rule are still very rare. Though scholarship about chilling effects during the Trump administration are as yet limited, researchers report that the immigration consequences of the new rule took effect quite swiftly. Researchers posit that, because of the expanded public charge test, “refusals of [immigration] applications on public charge grounds quadrupled to 13,500” cases in 2018 (Bernstein et al., 2019, p. 3). Evidence-based evaluation of chilling caused by the new rule is only just beginning.

In particular, no studies about the possible interaction between the public charge rule and ESL program enrollment have yet been conducted. In 2019, vanguard researchers launched the first wave of scholarship about the new rule's impact. These authors acknowledge that, before publishing their own studies, “evidence on this chilling effect ha[d] largely been based on anecdotal reports from service providers” (Bernstein et al., 2019, p. 2). Even professional researchers publishing for well-regarded institutions (in Bernstein et al. (2019)'s case, for Washington, D.C.'s Urban Institute) who were focused on studying comparatively

well-documented programs like SNAP and Medicaid struggled to find prior research about recent chilling upon which to build their new contributions. More is the challenge for TESOL professionals to find scholarship that links inadmissibility policy and the ESL classroom, as ESL is not traditionally considered alongside other programs as a “public benefit,” per the legal definition of that term in the Code of Federal Regulations (Definitions, 2019). This study will break new ground to shed light onto the relationship between the new rule, its proven chilling effects on immigrants’ participation in public services, and the possible extension of that chilling to adult ESL program enrollment.

Professionals in the TESOL, education, and policy fields need to know whether chilling did occur in regard to ESL programs. Research shows that immigrants with low English-language proficiency face barriers to achieving financial and physical health (Bleich & Fleischhacker, 2019), so disenrollment or forgone enrollment in ESL classes has effects that permeate immigrants’ lives outside of the classroom. It is also crucial to note that, because chilling effects caused by the new rule were particularly strong in mixed-citizenship status households with children, reduced participation in public services disproportionately affected U.S. citizen children living with immigrant relatives (Bernstein et al., 2019).

Continuing to build our knowledge about the effects of expanding the public charge rule will prime immigrant communities, advocates, educators, and legislators with vital knowledge about how inadmissibility policy expansions can harm immigrants and all of us who live alongside them. By documenting these effects through scholarship, today’s researchers can ensure that future policymakers will not be able to claim that they had no forewarning about how

policy changes that impede a legal path to citizenship can harm immigrants, U.S. citizens with immigrant relatives, and the public at large.

My own interest in public charge legislation was catalyzed by my experience working as a Program Director at 18 Reasons, a San Francisco Bay Area food education nonprofit that provides SNAP-Ed programming (healthy cooking and nutrition classes for low-income families called Cooking Matters classes) and grocery donations to low-income households at risk of hunger and diet-related disease. In the fall of 2018, several of the partner organizations from whom I received participant referrals, organizations serving low-income families such as federally qualified health centers, public schools, food pantries, and low-income housing sites, flagged their concern about our Cooking Matters sign-in sheets. The low-income clients they were recommending for our program were beginning to shy away from attending classes because of their fear of having to sign in at the beginning of class. Though I did not have the language to describe what I was seeing at the time, food-insecure families' participation in any program they perceived as carrying a public charge threat, even in a program like ours that was legally irrelevant to the public charge test, had begun to chill.

Our low-income Cooking Matters participants represented the very group that Barofsky et al. (2020) reported were most likely to show chilling: low-income families with children. In my Spanish-language *Cooking Matters para Padres* and *Cooking Matters para Familias* classes, in particular, I heard guardians express their fear of immigration consequences for their families. Their panic about recent ICE raids in Alameda County, where we lived, burned white-hot; they were terrified that they would be separated from their children. As a result, participants hesitated to join our classes, as they did not know that our program was safe for them to use from the

perspective of public charge threat. Although they needed our help to feed their families well, parents were chiefly concerned that any action they took to receive services could carry a public charge risk.

As our students feared leaving any kind of paper trail that would document their use of services, we stopped recording participants' names and did away with sign-in sheets altogether; nevertheless, public charge fears in the community continued to curb our ability to reach families in need. Just as Bleich and Fleischhacker (2019) predicted, expanding public charge criteria (and doing so in a way that engendered “fear or confusion” about negative immigration consequences among low-income families, as the Trump administration had done) “hindered trust in seeking government assistance or even help from non-governmental sources” (p. 508). To many low-income immigrants considering seeking help from community organizations like ours, the perceived risk of potential immigration consequences was too high a price of entry. Even among those families who did join us, this arcane little policy clause became a shockingly common discussion topic for what purported to be a healthy cooking class. Our classes became a vital space for resource-sharing among immigrant families concerned about rising anti-immigrant sentiment in the United States, and participants also looked to our staff and volunteers for help understanding how to navigate the swiftly flowing river of immigration policy changes that seemed to be making headlines every day.

Wondering what I could do to educate myself and become a better resource for my students, I signed up to attend a town hall meeting about the announced expansion of the public charge test organized by Alameda County Supervisor Wilma Chan in November 2018. There, I heard representatives of community institutions like our local food bank and trauma hospital, as



well as county staff working in public health, give anecdotal evidence of the growing chill among their immigrant clients; and I heard diverse community members of different citizenship statuses share immigration-related fears for themselves and their families. Healthcare and food aid service providers collaboratively sponsored the event, and local nonprofits like ours were quick to put our heads together to develop and disseminate information to our clients in order to support their continued access to food and to be better able to answer their questions about what public charge policy changes meant for them.

Our entire sector seemed to be feeling the effects of redefining “public charge.” Bleich and Fleischhacker (2019) note that, ironically, “during periods when regulatory or budgetary changes reduce SNAP participation” (such as the period of recent changes to the public charge rule), the strain on the charitable food sector actually mounts, despite chilling on rates of participation in federal food aid programs (p. 507). What we were seeing in the community at that time was borne out in the data: more than one quarter of immigrant parents reported they stopped using SNAP or other food programs due to immigration-related concerns (Protecting Immigrant Families, 2021).

The pressure was on for nongovernmental organizations to allay increased food insecurity among immigrant families. Bleich and Fleischhacker (2019) assert that the announced public charge policy changes placed a greater “burden” on the charitable sector to meet the needs of their low-income clients, as families wary of the public charge test were less likely to perceive “the large network of... food pantries, soup kitchens, shelters, food banks, churches and other faith-based organizations, and food rescue organizations that provide groceries and necessities to low-income households” as carrying public charge liability (p. 507). The healthcare sector, and

especially nonprofit and federally qualified health centers, also experience “heightened demand” (p. 506) during periods of inadmissibility policy reform and chilling, leaving them with a “disproportionate” burden (p. 507) on their limited resources.

It was certainly true that some families saw 18 Reasons as a “safe” resource for food and information. The interplay between chilled enrollment in Cooking Matters programs due to participants’ fear and, on the other hand, the growing share of hunger in our community that our network of nongovernmental partners was trying to shoulder made for a complex experience at the intersection of food security and immigration policy. It was a tremendous help that 18 Reasons was just one organization in a larger ecosystem of food assistance and public health organizations used to collaborating on shared messaging. Being a part of coalitions like the Alameda County Nutrition Assistance Partners, which brings government agencies and nonprofit organizations serving food-insecure residents together, helped us “develop, implement, evaluate, and disseminate best practices” for addressing community concerns about program participation and access to care, just as Bleich and Fleischhacker (2019) hoped that we, as a network of service providers, would be able to do (p. 507).

Outside of my workplace, in my role as a volunteer Teaching Assistant in a high-beginning ESL class at Berkeley Adult School, I keenly felt the absence of that kind of community of practice coming together to address the public charge concerns that students were raising in class. In the ESL classroom (as in the Cooking Matters classroom), I faced students urgently seeking reliable information about what community services were “safe” for them to use. A very diverse group of adult immigrants hailing from twenty different countries on five

continents peopled our classroom, but they were united in their common desire to protect their families from adverse immigration consequences.

In contrast to the experience I had as a food aid worker tapped into a broader coalition of service providers, it seemed to me that, because of our lack of centralized or organized messaging about public charge, we as TESOL professionals were unprepared to respond to our students' concerns. Broadening inadmissibility policy was known to our nutrition assistance network to drive disenrollment in food aid programs among eligible families, so we knew we needed to act quickly to respond to the changing needs of our community. On the other hand, there was no documented scholarship about how changes to public charge policy might affect ESL program participation, and we as ESL teachers did not act in an organized way to preserve our students' access to vital language education. The lack of scholarship about the potential chilling of ESL program participation among adult immigrants presented a ripe opportunity for me to contribute to the TESOL field, in the hopes that knowledge of potential chilling effects will help practitioners, administrators, and policymakers better serve our students during times of heightened concern about immigration policy.

### **Purpose of the Study**

The purpose of this study was to examine the impact that public charge rule changes under the Trump administration may have had on adult immigrants' participation in public, state-funded (i.e., non-credit) or state-subsidized (i.e., credit) ESL classes at community colleges. Per Bernstein et al. (2019), more than 20% of adults in low-income immigrant families reported chilling of their use of means-tested benefits, but before the analysis presented in this thesis was

conducted, it was not yet known whether a similar chilling effect also constrained their participation in ESL programs.

In order to address the current gap in scholarly knowledge about the public charge rule's possible role in deterring adult immigrants' participation in public ESL programs, this study analyzed ESL enrollment records from community colleges throughout California to determine whether there was a correlational relationship between public charge legislation milestones and ESL disenrollment trends. The 2018 expansion of the public charge test could have prompted a chilling effect that mirrored immigrants' forgone participation during this same time period in other state-funded services (e.g., SNAP, the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), Medicaid, health education services in public schools, and more).

Public ESL classes, which are funded by state monies, are not often discussed in research about immigrants' use of government services; however, such ESL programs are, indeed, a state-funded service that millions of adult immigrants in California take advantage of each year (Bunch et al., 2011). Despite the tendency to overlook ESL programs in studies of immigrants' use of public services, existing research does offer robust knowledge about how previous immigration law changes (including changes to the public charge rule) affected immigrants' enrollment in "traditional" safety-net services (e.g., food aid, subsidized low-income housing). This thesis built on prior research about how immigration policy changes and limited English-language proficiency have each exacerbated social inequities experienced by immigrants, experiences such as child poverty, poor health outcomes, food insecurity, and under-enrollment in safety-net services. The narrative and data analyses presented here probed the intersection of immigration policy and adult ESL education, in order to begin to narrow the

gap in our knowledge about the relationships among immigration policy changes, language proficiency, ESL enrollment, and social inequality.

### **Research Questions**

1. During recent changes to public charge policy under the Trump administration, did adult immigrants' rates of participation in ESL programs at community colleges in California chill, as did their participation in federal means-tested benefits?
2. Were possible chilling effects in ESL program participation stronger for any specific demographic subgroup of adult ESL students, especially in subgroups already proven to show more chilling under the Trump administration (such as Hispanic people, people of color, and low-income people)?

### **Theoretical Framework**

The positive feedback loop driving disenrollment in ESL classes, lack of English proficiency, and poverty, a cycle wherein marginalization begets further marginalization, is illustrative of Social Reproduction Theory (SRT), which was first posited by Karl Marx in 1885. This thesis used an English translation of Marx's *Das Kapital* published in 1996. Per Marx's (1996) seminal SRT theory, a person's "human capital" (i.e., the education or training that they receive) fuels their ability to gain other types of capital, to access wealth, and to escape or evade poverty. Increased human capital (one's education) is particularly linked to increased "social capital" (one's access to opportunity), and, ultimately, to increased financial security (Marx, 1996). It follows that, if an adult immigrant disenrolls from their ESL program or forgoes

enrollment in such a program due to changes in the public charge rule, they are less able to partake of the social mobility on which our American system prides itself.

Per Bleich and Fleischhacker (2019), the new rule is likely to result in “economic instability among non-participating eligible individuals and households,” which will “increas[e] food insecurity and worsen health outcomes” among immigrants to the United States and among U.S.-born citizen children of immigrants (p. 506). Kaiser (2008) underscored the “very high rates of food insecurity” among women and mothers potentially eligible for federal nutrition assistance programs who do not apply for benefits specifically because of their fear of immigration consequences (p. 1293). “Avoidance of government programs appear[s] to be [a] barrier” to the thriving of immigrant groups (Kaiser, 2008, p. 1289). Thus, the new rule’s chilling effect acts as an amplifier of existing hardship, serving to drive the social reproduction of inequities already disproportionately burdening immigrants and low-income families.

Structural barriers that reduce immigrants’ access to social capital and deter their participation in English-language education reproduce and perpetuate social inequity. If the public charge rule did, in fact, act as a structural barrier to immigrants’ accessing English-language education by reducing their enrollment in public ESL classes, the expanded new rule can be said to have acted through social reproduction as a tool to disempower immigrants. All advocates for social justice will be edified to learn whether this was the case; thus, SRT is the theoretical foundation of this study.

## Methodology

This study examined enrollment trends in community college ESL programs using publicly available enrollment records from every community college in California. For a list of all California community college districts, school names, and district websites, see **Appendix A**. Community colleges are supported by public sector funding, and, as a result, non-credit ESL classes are free, and credit ESL classes are subsidized to keep them relatively affordable. Given that immigrant families' use of nonprofit food pantries, WIC benefits, and other services not subject to the expanded public charge rule was chilled under the Trump administration, immigrants may also have mistakenly counted ESL programs among the public services they should avoid in order not to court a public charge threat.

California community colleges are required to make student success metrics available to the public in order to foster transparency and accountability and to provide data that researchers interested in community college programs need. The California Community Colleges Chancellor's Office provides student success metrics to the public via the Cal-PASS Plus program, which is a statewide clearinghouse of enrollment and other data that can be broken down by location (i.e., region, district, school) and by many other factors, such as program type and student ethnicity, socioeconomic status, gender, age, etc. (California Community Colleges, 2021).

For this study, data sets from the Cal-PASS Plus student success metrics database were pulled in order to gather anonymized student demographic data and enrollment numbers from five school years (2015-2019) for all 72 community college districts, representing students

enrolled in every one of the 116 community colleges in California. All data were sourced via a student success reporting system called LaunchPad, which is available for free to the public (California Community Colleges, 2021). This study was not subject to the University of San Francisco's Institutional Review Board because it utilized anonymized, publicly available school records and presented no threat to students whose enrollment was represented in the data set.

In particular, this study analyzed ESL enrollment data to determine whether there were any drops in ESL enrollment above and beyond observed trends in non-ESL enrollment at community colleges. In order to isolate chilling effects among adult immigrants, enrollment records for ESL programs were compared with those for non-ESL programs, with this latter category being considered a "control group" likely to represent a mostly non-chilled population. Because ESL programs for adults are a service specifically offered for immigrants and one that is irrelevant to native English speakers, comparing ESL participation rates versus non-ESL participation rates gives us an approximation of a model to measure chilling among immigrants. If the data show a statistically significant difference in enrollment changes among ESL programs as compared with non-ESL programs, it can be said that ESL program participation was chilled.

Special attention was paid to an exploration of whether any observed chilling may have correlated with the timing of significant milestones toward the adoption of expanded public charge policy. These milestones were the November 2016 election of President Donald Trump, the January 2017 leak of proposed changes to public charge policy, the October 2018 official announcement of the new rule, and the October 2019 planned promulgation of Trump's new



public charge policy. See **Appendix B** for a table of milestones and dates relevant to the development and ultimate adoption of the expanded public charge rule.

This study relies on a case study methodology. According to Creswell (2007), case studies are concerned with bounded systems (often institutional-level cases concerned with “how” and “why” research questions), which may illustrate a larger pattern of occurrence (p. 73). Because of the limitations of the present study, the results herein are not intended to be broadly generalizable, but rather, they may provide information and inspiration to education professionals and future researchers.

This thesis used the “multiple case study method,” wherein the researcher selects multiple programs to review, in order to seek the answers to a set of research questions (Creswell, 2007, p. 74). Again per Creswell (2007), the advantages of this case study approach include that case studies recognize the “embeddedness” of social truths; they can provide a “step to action”; they make obscure data (such as ESL attendance records) more publicly accessible and comprehensible; and they can be undertaken by a single researcher without the need for a full team. In particular, the idea that the present study might serve to justify potential corrective action offers strong alignment with the University of San Francisco School of Education’s mission to “change the world from here.” Perhaps, by informing policymakers, educators, and advocates, this thesis may inspire the “step to action” that Creswell (2007) invokes. For these reasons, a case study approach is the most appropriate choice for this thesis.

To prepare the data, combining enrollment data from 114 separate spreadsheets (72 distinct-level sheets of ESL enrollment data and 72 of non-ESL data) and meticulously pruning

the data set was necessary. This is because the original data set from LaunchPad contained information irrelevant to the scope of the present study, such as student age, sexual orientation, and veteran status. The data preserved for analysis in this study included, for both ESL and non-ESL programs, and per locale by year: overall program enrollment, enrollment per student ethnicity, and enrollment per socioeconomic status (as determined by eligibility for the federal Perkins Loan Program for low-income students). For a complete table of raw enrollment data used in this study, see **Appendix C**.

From there, the enrollment numbers per locale were normalized across the years above so that their means were 0 and they had a standard deviation of 1, which produced z-scores that can be meaningfully statistically compared, because the enrollment z-scores were on the same scale. This was necessary because the scales of various data differed greatly, for example when comparing enrollment in a small district with that of a larger district, or when comparing enrollment specific to ESL programs with the combined total of all non-ESL enrollment, which represents a much larger student body. Z-scores enabled our analysis to yield meaningful results. For a complete table of normalized enrollment data, see **Appendix D**.

Finally, the year-over-year overall difference in enrollment for ESL versus non-ESL programs was analyzed using the z-scores, and this same analysis was repeated by student subtype, in order to compare certain demographic categories. Conducting an analysis of overall enrollment trends for each program type allowed me to look for signs of general chilling of ESL program participation (answering research question 1). To answer research question two and surface whether chilling effects were more apparent among students of given subtypes, a comparable analysis was completed comparing enrollment trends among Hispanic students

versus non-Hispanic students, students of color versus white students, and low-income students versus higher-income students. The choice of specific subtypes included in the demographic-specific analysis was inspired by previous research on means-tested benefits participation rates showing that Hispanic (e.g., Food Research & Action Center (2020), Haley et al., (2021)), non-white (e.g., Bernstein et al., (2019), National Immigration Law Center, (2019)), and/or low-income (e.g., Manatt (2018), Urban Institute (2021)) immigrants were more likely to show chilling.

To uncover any chilling effects, I repeatedly ran Welch's t-tests to determine whether there was a statistically significant difference in overall enrollment changes across ESL programs and non-ESL programs. Finding a statistically significant difference in ESL program enrollment distributions versus non-ESL program enrollment distributions across locales would indicate a meaningful pattern of disenrollment, thus chilling can be said to have occurred for the given program or student category in the given year. Results of the study will be the subject of Chapter III, and for a complete table of the results of our statistical analysis (including means of normalized enrollment change data for ESL and non-ESL programs, standard deviations, t-test  $p$  values, and t-test statistics), see **Appendix E**.

### **Limitations of the Study**

Only data sets from community colleges in California were analyzed in the course of my research, so this study may have limited generalizability to other locations' community college student populations. Enrollment trends in community colleges throughout California do not necessarily represent corollary enrollment trends among programs located elsewhere.

Another limitation of this study is the lack of prior research about whether and how public charge-related fears impact enrollment in ESL classes. Although numerous scholars have documented the chilling in government-funded programs like WIC, SNAP, and Medicaid that occurred as a result of recent public charge policy changes, as of the writing of this thesis, there have been no studies exploring the relationship between policy changes and ESL enrollment. There is a wide gap in our collective scholarly knowledge about the intersection of immigration policy changes and ESL program participation; thus, additional future research about this topic would benefit TESOL practitioners, community advocates and organizers, immigrant families, and policymakers.

Additionally, some specifics about this study's data set potentially limit the validity of my statistical analysis. First, enrollment data from community college students are all self-reported, which inherently implies subjectivity on the part of the enrolled. Second, some outdated terminology may have affected students' choices about how to describe themselves in their paperwork. For example, in the student enrollment forms from which these data originate, the term "Hispanic" was used to describe an ethnic category that researchers and students might describe as "Latinx" in the parlance of today (although that term is also controversial). This lexical disconnect between the ever-progressing terms for various identities students are likely to use in California, which is a relatively progressive state, and the language used on their intake forms may have muddied the data. Students may have been more to describe themselves in ways that did not exactly correspond to their own self-identification, or they may have chosen "other," or left questions blank when they could not find a label they felt was appropriate.

Next, the timeline of enrollment data used in this study was necessarily limited by the onset of the COVID pandemic in the United States in March 2020, as any changes in enrollment rates during the 2020 school year were likely to have been caused by school closures, fears of contracting or spreading the disease, and the challenges of pivoting ESL to virtual instruction. Therefore, no enrollment data from after the 2019 school year were included in this study.

Another time-based limitation of note is that California Community Colleges' report their student success metrics per academic year (i.e., data in the set about enrollment in the academic year "2016" describe enrollment from fall 2016 through spring 2017). As a result, it is not possible to track more minute enrollment trends that may have unfolded on a semesterly or monthly basis, as the political climate around issues of immigration were rapidly changing. As a result, given a certain public charge-related policy milestone (for example, the January 2017 leak of the plan to expand the public charge test), it is not clear when exactly any changes in enrollment related to that milestone would be likely to become evident. In our example, it is uncertain whether program disenrollment related to the January 2017 leak would be more likely to show up in the enrollment data from academic year 2016 (fall 2016-spring 2017) or those from academic year 2017 (fall 2017-spring 2018). Further, it is unclear whether the California Community Colleges' public enrollment data for a given school year represent the number of enrollees at the beginning of the semester (i.e., the number of students enrolled in the fall) or the number of students remaining in the program during the spring semester, and this uncertainty further affects our ability to directly correlate disenrollment trends with the timing of legislative milestones.

### **Significance of the Study**

The primary significance of this study is to determine whether there was a chilling effect on ESL students enrolled in community colleges throughout California that coincided with public charge rule changes during the Trump administration. Previous studies of chilling among immigrants eligible for means-tested benefits, such as SNAP and Medicaid, showed particularly strong chilling effects in 2018 (Bernstein et. al, 2019), so it may be that ESL classrooms also saw demonstrable chilling in that year. This study is consequential because there is little existing research about the relationship between changes in inadmissibility policy and immigrants' participation in state-funded ESL programs. Although this study is limited in scale, comparing ESL program enrollment rates among adult immigrants from before and after the public charge rule changes were announced in October 2018 may be of significance to TESOL professionals, education and policy researchers, and change-makers such as legislators and funders.

For TESOL professionals, including teachers and administrators, this thesis will serve as a source of information about how their students' experience of immigration policy changes can affect their choice to enroll in English-language classes. Per Bernstein et al. (2019), "providing families accurate information and guidance" on public charge rule changes "could help mitigate further chilling effects" among immigrants (p. 13). Because of their ready access to "vulnerable and hard-to-reach families" who "are afraid of interacting with government authorities," informing school staff who interface with immigrant communities about the public charge rule is key to this mitigation strategy (p. 13). Bernstein et al. (2019) resolutely advocate for "investing in educating service providers who may interact with immigrant families [about changes to

immigration policy],” in order to combat student misconceptions and ensure that immigrant families are able to make informed choices (p. 13). To sum, Bernstein et al. (2019) advocate for educating educators, which is exactly what this thesis aims to do.

For other researchers, this thesis may galvanize future research about how inadmissibility policy (or immigration policies more generally) impact educational services like ESL programs. If more authors were inspired to consider public ESL programs alongside other state-funded services for immigrants in their research on policy and its effects, the field would quickly come to know a lot more about how ESL programs fit into the larger ecosystem of services for immigrants. Finally, funders and policymakers in the immigration and education fields may find this thesis useful as they determine what new horizons their fields will explore. Decisions made at this high level have the capacity to drive a structural shift toward equity that could improve immigrants’ (and especially adult ESL students’) educational experiences and outcomes.

If research in the field continues to leave unanswered questions about how immigration policy changes affect ESL program enrollment, educators will continue to be unprepared to address legislative barriers facing their students. Forces that prevent immigrants from thriving in the United States, such as limited English-language proficiency and under-enrollment in public benefits, are directly connected with inadmissibility policy changes (Bernstein et al., 2019). The expansion of the public charge rule is proven to have curtailed low-income immigrants’ use of public safety-net programs, leaving this already vulnerable segment of our population even more likely to suffer deleterious health and financial outcomes. This study will begin to show how ESL program participation factors into the equation.

## Chapter I Summary

This introductory chapter provides context for the current study, including discussing the problem it aims to assuage: the lack of research exploring possible chilling effects in adult ESL programs correlated with changes to the public charge rule under the Trump administration. Chapter I also seeks to inform the reader about how the study examined ESL enrollment trends to answer its guiding research questions. Analysis included an exploration of a possible drop in enrollment in ESL classes at community colleges throughout California, which would echo previous findings by scholars studying reduced participation rates in programs such as SNAP, WIC, and Medicaid during the same period. This study is needed because of a current dearth of scholarship linking chilling effects to ESL programs for adult immigrants, despite the fact that immigrants' enrollment rates in other services provided by our government have been extensively analyzed to determine rates of chilling.

Taking Social Reproduction Theory as its theoretical underpinning, this thesis will provide information to TESOL practitioners, administrators, and education policymakers in order to empower them with knowledge about how changes to immigration policy may challenge their programs, influence enrollment rates, and affect their student population. Armed with this knowledge, education professionals and policymakers at any level will be more prepared to address community concerns as inadmissibility policies change.



## **CHAPTER II REVIEW OF THE LITERATURE**

### **Introduction**

The following review of literature explores the intersection of four areas of knowledge: the history of inadmissibility policy in the United States; how the public charge rule changed under the Clinton and Trump administrations and how immigrant communities were affected; how language barriers and fears of negative immigration consequences cause under-enrollment in safety-net programs among immigrants; the ways that inadmissibility policy perpetuates the social reproduction of inequality in American society; and how the expanded public charge rule came to be repealed in 2021.

### **Situating the Modern Public Charge Rule within its Historical Context**

To understand how deep lie the roots of public charge policy in the United States, one must travel back in time over 160 years to visit the chambers of the 47th United States Congress and their Immigration Act of 1882. An in-depth analysis of the history of income-based inadmissibility policy is outside the scope of this thesis, but a familiarity with some of the United States' most seminal exclusion policies will ground the reader in helpful context about the racialized application of such "poor laws" designed to send, in the parlance of the time, "paupers... back to their places of origin" (Hirsi, 2018). Immigration policy historians Hester et al. (2018) agree that the Trump administration's changes to the public charge rule are best

understood in their historical context. In their view, Trump’s expansion of the public charge rule “cannot be understood apart from the history of public charge deportations” (p. 1). These historians also encourage their audience to consider how the legal precedents we set now will live on in the future, as our own choices “will lay the basis for future deportations” (p. 1), and our legal legacy will tell the policy historians of tomorrow much about the values of our immigration system.

Exclusion of certain immigrants based on their race and socioeconomic status was baked into U.S. immigration policy even from its earliest days. In the 1790 Naturalization Act, one of the very first pieces of immigration legislation in U.S. history, the federal government proffered legal and immigration-status privileges to white immigrants, stipulating that only “free white men” could naturalize as U.S. citizens after immigrating (Phillips, 2021). In effect, this stipulation prohibited certain immigrants from being citizens on racial grounds, but it also excluded people of lesser means, because only white men who were “landowners or had some other wealth” fit into the law’s definition of allowable citizenry (Phillips, 2021).

At the time, northern European and Mexican people were considered “white,” but Irish and southern European immigrants, among immigrants of other origins, were excluded by the Naturalization Act as non-whites (Phillips, 2021). To notice how another era’s system of racial categorization differs from our own—which today, per the 2020 U.S. census, allows the labels White, Black or African American, American Indian or Alaska Native, Asian, and Native Hawaiian or other Pacific Islander (United States Census Bureau, 2021)—underscores the socially constructed nature of these categories.

As a result of the Naturalization Act, not only did non-white immigrants suffer prejudice under the law, but their white counterparts also enjoyed racialized legal benefits, exacerbating the racial inequities that have always been endemic to United States law. Phillips (2021) quotes Professor of Comparative Ethnic Studies Rory Ong's reminder that inadmissibility policy has never been, and is not today, race-neutral: "When you see people raging about Mexicans or Asians in particular ways, to me, it's just part of the rhetoric that's long been embedded in everyday U.S. life, how we define ourselves against one another," says Ong. "It's a constant." Murillo (2017) noted that, when the Trump administration first expressed their interest in expanding public charge—an income-based exclusion—in 2017, they did so almost immediately after issuing the so-called "Muslim ban" on the admission of people from six Muslim-majority countries (an arguably racialized exclusion). From the very inception of American inadmissibility policy and continuing today, race- and income-based exclusions have often gone hand-in-hand.

In 1882, the United States Congress passed the infamous Chinese Exclusion Act, which forbade all immigration of Chinese laborers into the United States and was the first racialized inadmissibility policy in the country (Phillips, 2021). The earlier Naturalization Act established racial barriers to ensure that "non-white" immigrants could not become U.S. citizens—in so doing, excluding them from the voting body—but the Chinese Exclusion Act went so far as to prohibit the very *admission* of a certain race of people into this country. The Chinese Exclusion Act built upon the Page Act of 1875, which had banned any Chinese women from entering the United States in an "unveiled attempt to stop Chinese from establishing U.S. homes and families" (Phillips, 2021). Much as members of these families were already barred from

permanent legal status in the United States, they were now also deportable under the law because of their ethnicity.

As astute readers might guess, the race-based inadmissibility policy that Congress promulgated through in the Chinese Exclusion Act was complemented by an income-based exclusion policy they passed that same year, the Immigration Act of 1882. The Immigration Act is the most direct legal ancestor of today's public charge rule because it codified, for the first time, our government's practice of blocking immigrants of low socioeconomic status—people whom the Act referred to as “undesirables”—from entering the United States (Hirsi, 2018). The Act specifically prohibited the admission of “any convict, lunatic, idiot, or any person unable to take care of himself or herself without becoming a public charge,” thus providing our first legal definition of the term “public charge” in U.S. law (Hester et al., 2018, p. 1).

Even prior to the 1882 ratification of the Immigration Act, officials could be observed excluding and expelling immigrants based on their perceived socioeconomic unacceptability, but the Act served to legitimize this practice (Hester et al., 2018). These inadmissibility policies stemmed from British “poor laws” that the very first colonial émigrés brought with them from their mother country (Hirsi, 2018). As detailed by Hester et al. (2018) and Hirsi (2018), colonial and U.S. administrators were particularly keen to deny the “non-white” among the huddled masses a safe harbor, most especially the many Irish immigrants fleeing their home land at the time. These authors both present evidence that the Immigration Act in 1882 was enacted in order to stem the tide of poor Irish immigrants whose fortunes were devastated by the Irish Potato Famine. Anyone hoping to learn about the effects that recent changes to admission and deportation regulations have had on today's immigrant communities would do well to build on

these scholars' prior knowledge about the origins and implications of past U.S. inadmissibility policy.

### **Public Charge Rule Changes and Chilling under Clinton and Trump**

With an understanding of how inadmissibility policy fits into the broader legislative history underpinning the immigration system of the United States, it is now time to turn our attention back to the public charge policy of our own era. The recent expansion of the public charge rule by the Trump administration is part of a larger narrative of redefining “public charge” in relation to the modern American safety net that began during Clinton-era welfare reform in the 1990s. Prior to the 2018 announcement of the expansion of the public charge test, changes to public charge statutes had not been proposed since that time, almost thirty years previously (Hester et al., 2018). Fix and Capps (2017) see a direct connection between Clinton’s and Trump’s reforms to public charge policy: “One has to go back to 1996, when the U.S. welfare reform system was substantially overhauled, to find a policy with such potentially far-reaching effects on immigrant households [as the expansion of the public charge test],” and Gessen (2020) concurs that the 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRA) is the “immediate predecessor” to Trump’s public charge policy changes.

The last public charge changes to predate Donald Trump’s presidency were enacted through the Immigration and Naturalization Service (INS)’s *1999 Field Guidance on Deportability and Inadmissibility on Public Charge Grounds* (Department of Homeland Security, 2018, p. 51133), which, per (Gessen, 2020), should be viewed as a corollary of the 1996 PRA. Passing the PRA is said to be Clinton’s “signature legislative achievement,” and the Act’s name

is sometimes used synonymously with the term “welfare reform” (Gessen, 2020). In passing the PRA, Clinton had made good on his “promise to end welfare as we have come to know it” (Gessen, 2020), but some confusion remained about how exactly immigration officials were going to apply new safety-net regulations to foreign-born visitors and residents in the United States. There remained a gap between what Hester et al. (2018) call “statute” or “case law” and officials’ everyday responsibilities—Hester et al. (2018)’s “customary practice” (p. 8).

One primary function of the *1999 Field Guidance* was to specify exactly which benefits were relevant to the public charge test in the wake of the comprehensive changes the PRA promulgated in 1996. Prior to receiving specific guidance about which public benefits should trigger public charge concerns and what kinds of immigration statuses entailed public charge risk, immigration officers may have applied the public charge rule on a more ad hoc basis. This discretionary application of the public charge test did not support a systematic and uniform implementation of policy. Helpfully, the *1999 Field Guidance* offered objective, specific test criteria to support officers’ decision-making, reducing subjectivity and inconsistency in the application of the rule and offering an updated definition of “public charge.”

In the 1999 guidance, Clinton’s INS confirmed that the government should hew to its traditional understanding of who was a “public charge,” upholding the “long-established” legal definition of the term (Hester et al., 2018, p. 7). Starting with the 1882 Immigration Act, the public charge clause traditionally “applied only to people accommodated at public charitable institutions” or who were “substantially dependent on public relief for the basic maintenance of

their lives” (Hester et al. 2018, p. 3), and this standard “remained remarkably constant for more than 100 years,” prior to Trump’s presidency, that is (p. 8).

While the Clinton administration chose in 1999 to abide by the historical meaning of “public charge,” the language they used to do so was significantly modernized in comparison with original public charge statutes, as might be expected. The *1999 Field Guidance* preserved continuity with the traditional legal purview of the public charge test, so it is particularly interesting to contrast the very different language used in the guidance versus that in the historical record of public charge policy to describe the same kinds of people. Public charge policy dates back to an era during which the social norms and vocabulary on display in contemporary United States law may seem almost unrecognizable to a modern reader. Hester et al. (2018) inform us that federal legal precedent of the time specified

excludable and deportable categories of immigrants included paupers, persons likely to become a public charge, persons suffering from a loathsome or contagious disease, felons, persons convicted of other crimes or misdemeanors involving moral turpitude, polygamists, anarchists and communists, imbeciles, feebleminded persons, persons with physical and moral defects which may affect their ability to earn a living, persons afflicted with tuberculosis, children unaccompanied by their parents, [and] women coming to the U.S. for immoral purposes [prostitution]. (p. 10)

Obviously, this example of historical inadmissibility policy chastises so-called “public charges,” but it also goes on to list additional categories of immigrants to be denied entry into the country for other perceived failings. Though we may find the language and concepts expressed here

antiquated and alienating through our modern lens, Hester et al. (2018) make it clear that the Clinton administration's understanding of "public charge" was, in fact, "consistent with [this] long-established policy defining public charges as those entirely dependent upon state support" (p. 10), rather than immigrants involved in safety-net programs to a lesser degree.

Let us now take a look at the language used in the *1999 Field Guidance*. The guidance defined a "public charge" as "an alien who has become primarily dependent on the Government for subsistence as demonstrated by either "(i) the receipt of public cash assistance for income maintenance purposes or (ii) institutionalization for long-term care at Government expense" (Hester et al., 2018, p. 7). It follows that immigrants' receipt of cash benefits or long-term, state-funded institutional care should raise a public charge concern, but their receiving other forms of help (such as food aid, access to low-income housing, and subsidized health insurance) was irrelevant to the public charge test. Hester et al. (2018) emphasize that the understanding of a public charge as someone unable to live independent of government assistance (due either to their significant reliance on cash or institutionalized care provided by the government) is in alignment with the 1882 Immigration Act's description of a "person unable to take care of himself or herself without becoming a public charge" (p. 1). In their view, the 1999 guidance reinforced the historically "established pattern defin[ing] a public charge as a person who fell *completely dependent* on public facilities" (p. 4) (emphasis mine).

Despite its apparent consistency with long-standing inadmissibility policy, research shows that Clinton's changes to regulations concerning immigrants' use of benefits, which culminated in the publication of the *1999 Field Guidance*, caused a significant chilling effect among low-income immigrants at the time (Makhlouf & Sandhu, 2020). That chilling occurred



begs the question: if the public charge clause in the 1999 guidance was apparently so aligned with its historic predecessors, why would the guidance result in chilling? It may have been the case that increased attention to this relatively arcane area of federal law amplified immigrants' awareness of public charge-based threats to their path to lawful residence. It is also important to note that Congress delineated eligibility for means-tested federal benefits based on residents' immigration status during welfare reform, which was a new addition to safety-net policy. They created two categories of immigrants: "qualified" residents included lawful permanent residents, refugees, and asylees; and "unqualified" residents included temporary visitors and undocumented immigrants (Hester et al., 2018, p. 6). Rules about benefits eligibility differed by immigration status; they differed in their requiring or not requiring a waiting period of five years' time before immigrants were able to access benefits; and, finally, they further differed depending on which was the benefit at hand (Hester et al., 2018). There were a lot of permutations.

Some benefits remained available to all people, regardless of their immigration status, such as emergency medical care; public health programs; school breakfast and lunch programs; K-12 public education; WIC; and short-term, non-cash emergency disaster assistance (Hester et al., 2018, p. 6). Some other benefits became accessible after a period of time, and some remained inaccessible to immigrants. Immigrants often did not know which combination of factors rendered a benefit "safe" from public charge risk, and chilling resulted. The expansion and increased complexity of public charge policy—especially if communicated poorly to immigrant communities at the time—would have seen many eligible immigrants disenroll from public benefits. Just as we see today, these immigrants were motivated to sidestep any public charge threat, as the high stakes of possible deportation would likely have been avoided at all costs.

Another driver of chilling among immigrants in the late nineties could have been the gap in time from 1996-1999 when field officers and the immigrant families with whom they liaise lacked crucial guidance about the proper application of inadmissibility policy. Hester et al. (2018) remind us that, in 1996, “Congress imposed time limits on access to some means tested benefits, and restricted eligibility for some lawfully present immigrants,” but that the “necessary clarif[ication]” of *which* immigrants and benefits were relevant to public charge would be three more years in coming (p. 6). As the dust settled on the ratification of the PRA, it stands to reason that there may have been widespread confusion among immigrant communities during the time when they lacked guidance from our lawmakers. Even federal employees were not exactly sure what the PRA spelled for immigration cases until 1999, so members of immigrant communities with much lesser access to information about federal policy were likely operating based on incomplete or incorrect information.

As today, there was concern throughout the welfare reform process that chilled immigrants would decline “emergency and other medical assistance, children’s immunizations, and [participation in] basic nutrition programs, as well as the treatment of communicable diseases” due to fears of immigration consequences stemming from changes to the public charge rule (Makhlouf & Sandhu, 2020, p. 6), potentially causing or exacerbating public health crises that could affect *all* people residing in the United States, regardless of their immigration status. In fact, there is evidence that public charge rule changes made during the 1990s “had a chilling effect on all immigrants” that prevented eligible participants from enrolling in government-funded services and seeking healthcare (Zedlewski & Rader, 2005, p. 546).

President Clinton himself expressed concerns about the fallout for immigrant families living in the United States in some of his first public comments about his signature welfare reform legislation. He admitted that passing the PRA required significant compromise and cross-aisle collaboration, which resulted in several specific addenda to the bill that he did not support. He anticipated they would cause chilling, especially among working families needing healthcare. In a speech delivered to members of the media, Clinton (1996) heralded the recent passage of welfare reform, but he allowed that the bill had its faults:

I am deeply disappointed that the congressional leadership insisted on attaching to this extraordinarily important bill a provision that will hurt legal immigrants in America, people who work hard for their families, pay taxes, serve in our military. This provision has nothing to do with welfare reform. It is simply a budget-saving measure, and it is not right... These immigrant families with children who fall on hard times through no fault of their own—for example, because they face the same risks the rest of us do from accidents, from criminal assaults, from serious illnesses—they should be eligible for medical and other help when they need it. (p. 1235)

Makhlouf and Sandhu (2020) take special care to show that, in addition to the President, the *1999 Field Guidance*'s own authors at the INS were also aware that their new policy would cause a deleterious chilling effect even as they published it. The INS acknowledged in the text of the guidance that eligible noncitizens concerned about the public charge rule would likely “forgo[e] or disenroll from public benefits based on a fear of being deemed a public charge” as a result of the 1999 rules (Makhlouf & Sandhu, 2020, p. 6). Fear and confusion were significant drivers of chilling during recent changes to public charge policy, as well (Bleich &

Fleischhacker, 2019). Such parallels between chilling effects observed in the 1990s and those catalyzed by the Trump administration's expansion of public charge policy thirty years later are apparent throughout scholarship exploring modern inadmissibility policy.

One such parallel between welfare-era policymaking and public charge rule changes during the Trump administration is the long gap in time between the community's becoming aware of impending inadmissibility policy changes (in 1996 under Clinton; in 2017 under Trump) and the subsequent clarification of what the new policy would look like in practice (in 1999 under Clinton; in 2019 under Trump). This chapter will address important steps in the development and adoption of the expanded, Trump-era public charge rule, and a complete table of relevant legislative milestones and dates can be found in **Appendix B**.

In the case of Trump-era policy changes, the long delay was caused, in part, by a leak of classified executive branch documents almost as soon as Donald Trump's presidency began. On January 23, 2017, just three days after President Trump took office, a document detailing his administration's plan to expand the purview of the public charge rule was leaked to media outlets (Barofsky et al., 2020, p. 1760). The leak came in the form of a draft Executive Order titled "Protect Taxpayer Resources by Ensuring Our Immigration Laws Promote Accountability and Responsibility" authored by Andrew Bremberg (2017), then working in the White House as Assistant to the President and Director of the Domestic Policy Council.

According to the leaked draft, the administration planned to break with long-standing federal guidance and expand the definition of "public charge," allowing officials to block immigrants from entering into or, in some cases, remaining in, the country, if they were deemed

likely to qualify for a broader array of public assistance programs than in the past (National Immigration Law Center, 2018). Specifically, the memorandum recommended that a person be declared “inadmissible” and “deportable” on public charge grounds for using virtually *any* “public benefits for which eligibility or amount is determined in any way on the basis of income, resources, or financial aid,” whether these benefits be in-cash *or* in-kind, which was a novel stipulation (Bremberg, 2017, p. 3). In essence, the planned action would open up “much wider grounds for deportation based on benefits receipt,” and factors such as being likely to receive or actually receiving food assistance, child tax credits, affordable housing support, etc., could both result in dramatic immigration consequences (Fix & Capps, 2017).

In the immediate aftermath of the leak, Fix and Capps’ (2017) analysis of the leaked memo demonstrated how unclear the new definition of “public charge” was to readers at the time. They posited that the memo could reasonably be interpreted to bar immigrants’ admission into the country and/or adjustment to green card or citizen status if they lacked a high school degree or did not possess a certain level of material assets. In contrast to previous legal precedent, the expanded public charge rule would not only preclude immigrants primarily dependent on the government for their livelihood (as a reminder, historically, that meant only people receiving hard cash or long-term institutionalized care from the government) from being accepted into U.S. society, but it would further threaten any low-income immigrant family already living in the country and receiving in-kind public benefits.

In addition, the draft order made it clear that the administration planned to “activate dormant policies requiring immigrants’ sponsors to repay benefits received [by their sponsorees]—a policy that has proved largely unworkable in the past” (Fix & Capps, 2017).

Immigrants' sponsors living in the United States would be required to assume financial responsibility for newcomers, attesting that their own personal wealth was sufficient to allow them (the sponsors) to reimburse the government for any fund spent providing for the basic needs of immigrants with limited means (Fix & Capps, 2017). Sponsors would be required to "reimburse the government for the cost of welfare benefits provided to such aliens," who, once in the United States, were eligible for safety-net support (Bremberg, 2017, p. 1). To be eligible for these benefits, immigrant families must, by definition, be living in poverty, and they must be authorized by the U.S. government to reside in the country, as "unauthorized immigrants were ineligible both before and after passage [of Trump's inadmissibility policy changes] and remain so today" (Fix & Capps, 2017). In effect, the new policy threatened serious immigration status consequences for immigrants of relatively low socioeconomic status, even those who were well-established members of U.S. communities; and the memo further threatened immigrants' family members and supporters with potentially sobering financial fallout, if they chose to vouch for their relatives to Uncle Sam.

Per Murillo (2017), this "controversial" policy proposition was predicted to severely restrict immigration to the United States. Within days of the leak, Fix and Capps (2017), writing for the Migration Policy Institute, began to sound the alarm that the proposed changes would, in their opinion, have "far-reaching," "dramatic," and "damaging" consequences for current and potential future legal immigrants and their supporters (Fix & Capps, 2017). Bremberg's rhetoric in the document made his zeal to "deny admission" to newcomers very clear; he sought to "identify and remove, as expeditiously as possible" immigrants of modest means in the United States (Bremberg, 2017, p. 3).

Bremberg's proposed change in inadmissibility policy rested on his claim—which Murillo (2017) called “dubious”—that noncitizens use a greater share of government-funded anti-poverty benefits than do citizens. He accused immigrants of demonstrating a lack of “self-sufficiency,” from which taxpayers must be “protected” (Bremberg, 2017, p. 1). Members of the media who read the memo upon its release in 2017 found fault with this claim almost immediately. Fix and Capps (2017) joined Murillo (2017) in her skepticism about Bremberg's positioning of newcomers as a drain on government resources, which they called a “misread[ing]” of the real state of affairs.

Fix and Capps (2017) further emphasize that “immigrants are a small portion of those using public benefits,” citing the findings of an Associated Press analysis of census data to determine trends in benefits use per citizenship status in the United States. Per these authors, the Associated Press reported that “non-citizen immigrants make up only 6.5% of all those participating in Medicaid,” and “more than 87% of [program] participants are native-born” (Fix & Capps, 2017). The same pattern was observed in food aid participation: only 8.8% of participants in nutrition assistance programs were immigrants, with 85% of participants being native-born Americans (Fix & Capps, 2017). Further findings by the National Academies of Science complement the Associated Press's. Per the Academies' “seminal 2016 study on the fiscal impacts of immigration,” “immigrants of all ages except for the elderly use fewer public benefits than the U.S.-born” (Fix & Capps, 2017). Bremberg's (2017) claim that “households headed by aliens (legal and illegal) are much more likely than households headed by native-born citizens to use federal means-tested public benefits” was clearly not factually accurate.

Murillo (2017) concluded that Bremberg's proposal "fails to provide any evidence" for the claim that immigrants demonstrate greater use of public benefits than their native-born counterparts, and she adds that Bremberg's insistence that immigrants represent a burden on taxpayers is "hotly contested," even among right-leaning policy researchers. It may be that political conservatives (who generally favor a smaller, more limited government with finite power to regulate market and labor forces) joined the Migration Policy Institute in finding fault with the impatient process by which the executive branch was attempting to influence legislation: "through the backdoor, via regulation, not legislation" (Fix & Capps, 2017). Fix and Capps (2017) sum up the Institute's concern about the manner in which Trump's staff proposed to change federal inadmissibility policy via the adoption of an Executive Order thusly:

... immigration on balance has served the nation. And by creating new exclusions on legal immigration and new grounds for deportation of legal immigrants, it would make systemic changes in the U.S. immigration system. In our view, these are decisions that should more properly be reserved for Congress. (emphasis the authors')

Hirsi (2018) also considers the Trump administration's approach to reinterpreting the public charge clause as "a backdoor way to restrict certain categories of immigration, particularly family immigration," opining "that's an easy way to achieve your policy goal without having to go through Congress." In short, authors of diverse political stripes may have felt that the proposed rulemaking was an overreach by the executive branch.

The changes described in 2017 did entail significant "systemic" and philosophical changes to immigration in the United States. In the aftermath of the leak, Fix and Capps (2017)



argued that the proposed rule changes were “part of a push” to move the United States toward an immigration system that focuses on immigrants’ skills and wealth, rather than on family reunification, which had previously anchored the immigration process. Boteach et. al (2018) agreed that the proposed rule—which earned the nickname the “Trump test” in the media—was designed to “limit family-unity and diversity-based immigration in ways that are a radical departure from current immigration law.” These authors writing for the Center for American Progress assert that the adoption of the leaked Executive Order would “unilaterally and fundamentally change the U.S. system for legal immigration in ways that would restrict immigration to the wealthiest and most privileged applicants” (Boteach et al., 2018). Trump’s expanded public charge test is so harsh in its restrictions of public benefits use that more than 100 million people, about a third of the U.S. populace, would fail if they were put to the Trump test (Boteach et al., 2018). It seems that American taxpayers, in general, would also be found lacking in Bremberg’s “self-sufficiency” if measured by the public charge standard.

Bremberg’s revised rule sought to better ensure that applicants for admission to the United States “do not depend on public resources to meet their needs, but rather rely on their own capabilities and the resources of their family, sponsor, and private organizations” (Fix & Capps, 2017). The new rule would shift the perceived “burden” of providing poverty relief to foreign-born immigrants and their families—including the U.S. citizen children living with immigrant guardians—away from the government and toward the realm of individual wealth and the private sector, more generally. Bremberg (2017) equates this proposed state of affairs with protecting U.S. taxpayers, leaving me to wonder who will “protect” taxpayers from the third of

Americans receiving assistance that would make them “public charges,” as defined in the draft order.

Bremberg’s leaked proposal emphasized his spurious claim that immigrants were disproportionately likely to burden the American safety net “without also including [information about] their economic contributions” (Fix & Capps, 2017). In so doing, Bremberg elided how immigration is fundamental to the health of the U.S. economy, apparently disregarding the fact that “immigrants fill critical... labor market needs” and conveniently ignoring that “many of the public benefits accessed by immigrants are by those who work full time” (Fix & Capps, 2017). The full story about benefits use by immigrants and native-born Americans remained to be told.

What is more, according to Bernstein et al. (2019), if Bremberg’s proposed changes to public charge policy were adopted, the new rule would threaten the prospects of applicants who might become eligible for non-cash benefits to be able to buy sufficient food and access basic healthcare in the United States. Programs such as SNAP, which pays for food for people living in poverty, and Medicaid, which provides health insurance for people living in poverty, would be newly subject to public charge evaluation. Per Helen Murillo of *Lawfare*, the leaked public charge policy proposal was swiftly “met with significant public criticism,” as the expansion of public charge policy would “discourage even lawful immigrants from seeking [health]care,” which would “thereby threaten public health... [and] national security” (Murillo, 2017). Almost immediately, concerns about immigrant families’ lack of access to food and healthcare bloomed in response to the perceived threat of punitive immigration consequences for poor immigrants.

The extended lapse of time between the panic-inducing leak in January 2017 and the intended promulgation of the new rule in August 2019 exacerbated confusion, fear, and avoidance of benefits participation among immigrant communities (Bleich & Fleischhacker, 2019). In their article “Spreading Fear: The Announcement of the Public Charge Rule Reduced Enrollment in Child Safety-Net Programs,” Barofsky et al. (2020) presented evidence that the leaked document stoked rumors and panic among immigrant families. The Food Research & Action Center (2020) found that immigrant families in their network were “not always familiar with the term ‘public charge,’ despite expressing fears associated with the rule” (p. 5), a clear indication of the miasma of confusion surrounding expanded public charge policy. Because the administration “signal[ed] an intention to substantially expand the safety-net programs covered by the rule” but “did nothing to provide accurate information or clarify what groups of noncitizens would be affected,” their leak saddled families and advocates with “vague...misinformation and an administrative burden,” which proved to be a catalyst for many immigrant parents’ fears of deportation and family separation (Barofsky et al., 2020, p. 1760).

Fix and Capps (2017) admit to their own confusion about what exactly the draft order indicated would be included in an expanded public charge test. If they, as policy scholars, could not parse the implications of the drafted order, one would expect that the general public had a much harder time understanding the vagaries of the draft. Bremberg’s redefining the terms “public charge” and “public benefits,” as his draft intended to do, would ricochet throughout low-income communities, effecting a chill among a much wider variety of federal programs than just top-line, means-tested benefits such as SNAP and Medicaid. The draft order referred to *all* “public benefits for which eligibility or amount is determined in any way on the basis of income,

resources or financial aid,” (Bremberg, 2017, p. 3), and for Fix and Capps (2017), “though [finalized] rulemaking might narrow its scope, this definition could include a wide variety of federal programs, such as school lunches, college financial aid, home heating assistance, and public health services.” The hefty importance that the drafted order seemed to place on immigrants’ personal wealth, connections to sponsors with wealth, skills, and education “could be interpreted to make a high-school degree or better... or having a certain level of assets” a prerequisite for admission into the country (Fix & Capps, 2017). It is, perhaps, not surprising, then, that chilling was anticipated to extend well beyond the programs and immigrants directly affected by the text of the expanded public charge test itself.

In October 2018, twenty-one months after the leak of their planned rule changes, the U.S. federal government officially announced its intention to expand the public charge rule (Department of Homeland Security, 2018). The official rule changes echoed the Bremberg (2017)’s sentiments, but the text was much lengthier, and it made an effort to clarify what exactly the expansion of the rule entailed. The new public charge rule, in contrast to the old one, would “restrict the admission [and residence] of certain non-citizens” identified by immigration officials as *potentially* at risk of becoming *partially* dependent on the U.S. government for subsistence (Makhlouf & Sandhu, 2020, p. 1). In contrast, as Makhlouf and Sandhu (2020) remind us, only those immigrants judged likely to become “totally dependent on the government for support” were subject to public charge-based repercussions in the past (p. 6), but the Trump administration planned to change all that.

Bleich and Fleischhacker (2019) offer a succinct overview of the changes to the public charge rule that the Trump administration proposed in 2018: the new rule would “greatly

expand” the Clinton administration’s *1999 Field Guidance*, which narrowly defined dependence on government assistance as participation in cash assistance benefits or long-term institutionalized care (p. 505). For the first time, under Trump’s new rule,

... the definition of dependence include[d] a more expansive list of public benefits and government assistance programs: specifically, SNAP, Temporary Assistance for Needy Families (also known as welfare), Medicaid, Medicare Part D (also known as prescription drug subsidies), and Section 8 (also known as housing vouchers). (p. 505)

If they had received assistance from a broad suite of government safety-net programs, the proposed new rule would deny prospective immigrants a path to citizenship or permanent residency, and the policy would even be applied to existing green card and visa holders (Bleich & Fleischhacker, 2019).

The Department of Homeland Security (DHS), which is the successor agency to the now-defunct INS, was the agency that published these proposed changes to the public charge rule in the Federal Register in 2018. The INS was disbanded during a reorganization of the federal government in the wake of the September 11 attacks of 2001, and in its place rose the newly created Department of Homeland Security. In this way, there is a direct through-line connecting the INS’s *1999 Field Guidance* to the DHS’s *Proposed Rules on Inadmissibility on Public Charge Grounds*, published on October 10, 2018.

The DHS’s notice of proposed rulemaking in the Federal Register is a complex policy document, but in essence, it declared the government’s intention to depart from the long-standing, narrow interpretation of “public charge” as an immigrant “substantially dependent

on public relief for the basic maintenance of their lives” (Hester et al. 2018, p. 3), and to instead “[re]define a public charge as an alien who receives one or more public benefits” (Department of Homeland Security, 2018, p. 51157). Makhoul and Sandhu (2020) argue that this change in policy “represents a dramatic shift in the way that the public charge statute has been interpreted” (p. 7), because its function shifted away from surfacing an applicant’s likelihood of being entirely dependent on government support and toward punishing any use of public benefits by immigrants, “even in a relatively small amount or for a relatively short duration” (p. 4).

Bleich and Fleischhacker (2019) further emphasize that, among low-income families with children (the group most likely to demonstrate chilling effects) “most (87%) worked in the prior year or will work the following year,” indicating that their reliance on government benefits to supplement their budget was, indeed, likely to be temporary (p. 506). Fix and Capps (2017) echo this finding, citing findings that “immigrants’ use of benefits, which is largely short-term, promotes their longer term economic and social integration—and thus helps maximize their contributions to the broader society.” Per the new public charge policy, even working families who need government support on a temporary basis were subject to immigration consequences.

In the announcement of proposed rule changes, its authors acknowledge that the expanded public charge rule will likely cause “disenrollment or forgoing enrollment in public benefits program [*sic*] by aliens otherwise eligible for these programs” (Department of Homeland Security, 2018, p. 51270). This unabashed admission of the harm the authors anticipated would come to immigrant families eligible for safety-net benefits echoes statements made by the INS in its *1999 Field Guidance*, in which those policymakers, too, allowed that they

were aware that their changes to the public charge rule would cause chilling. History—and the DHS, it seems—does have a tendency to repeat itself.

The 2018 proposal included a bulleted list of some of the worsening health and financial straits that the authors thought would be in store for low-income immigrants because of anticipated chilling. Per the DHS, rule changes were likely to cause “increased prevalence of obesity and malnutrition, especially for pregnant or breastfeeding women, infants, or children”; “reduced prescription adherence”; “increased use of emergency rooms and emergent care as a method of primary health care due to delayed treatment”; “increased prevalence of communicable diseases”; “increased rates of poverty and housing instability”; and “reduced productivity and educational attainment” among otherwise eligible households (Department of Homeland Security, 2018, p. 51270). Clinton’s INS and Trump’s DHS both admitted that public charge rule expansions were known to engender chilling effects; they knew their choices would aggravate the problems that already gave children from low-income backgrounds a harder start in life: poverty, hunger, health problems, and poor school performance.

The DHS clearly anticipated the negative health and financial outcomes facing low-income immigrants who would withdraw from services as a result of their rule changes, but policymakers made no effort to attenuate this harm. Accordingly, the more restrictive new rule has been called deliberately punitive in nature by Makhoul and Sandhu (2020), and these same authors urge us to remember that the families—including the U.S. citizen children—of noncitizens chilled from accessing public benefits suffer alongside them (p. 9). In reviewing the DHS’s published list of the likely consequences of chilling among immigrant families, it became clear to Makhoul and Sandhu (2020) that children from low-income families were particularly

vulnerable to chilling effects. Bleich and Fleischhacker (2019) agree, stating that “citizen children living with immigrant parents are among the most vulnerable to facing increased food insecurity and poorer health outcomes as a result of the proposed rule” (p. 506).

Lessons learned about the harm caused to immigrant communities by the 1999 codification of the public charge test seem to have been ignored or overlooked by Trump administration officials. The DHS “acknowledges and *blatantly disregards*” (emphasis the authors’) this problem, apparently without concern for the new rule’s consequences (Makhlouf & Sandhu, 2020, p. 9). Given all that scholars and policymakers know about chilling effects and the damage they caused to immigrant communities the last time the public charge rule made headlines, the Trump administration’s recreation of these same conditions of chilling and fear seems to Makhlouf and Sandhu (2020) to intentionally perpetuate patterns of inequity and disempowerment among immigrant communities. Continuing to study and document the effects that public charge policy has on immigrant communities will help ensure that, when future policymakers push to expand the rule yet again—as they surely will—they will be unable to turn a blind eye to the ways that past inadmissibility policies have threatened immigrants living in the United States and all of us who live in community with them.

As we shift our focus toward exploring how immigrant communities were affected by the expansion of public charge policy during Donald Trump’s presidency, it will be helpful to review the timing of some of the major milestones toward the government’s adoption of the proposed changes. The Trump administration’s involvement with public charge policy dawned with the January 2017 leak of a draft Executive Order about expanding the public charge test. The DHS announced their intent to expand the public charge rule in October 2018, opening a mandatory



60-day public commentary period that closed in December 2018. This commentary period is required when legislators intend to make certain changes to the Federal Register, and its aim is to offer laypeople the opportunity to improve or object to a draft proposal (The Office of the Federal Register, n.d.). In those two months, more than 260,000 individuals and organizations submitted public comments overwhelmingly in opposition to the proposed changes to the public charge rule, which was reported to be an unusually high level of engagement from the public (National Immigration Law Center, 2019).

The next year, in August 2019, the government finalized their expanded public charge policy (often called “the 2019 rule” or “the new rule”) and published it in the Federal Register, with the enforcement of the new rule set to begin two months later (in October 2019). Updating the policy consisted of adding four new sections to Part 212 of Title 8 law concerning “Aliens and Nationality”: sections 20 through 23 on, respectively, the applicability of public charge inadmissibility, relevant definitions, public charge inadmissibility determination, and exemptions and waivers for public charge grounds of inadmissibility (Part 212 - Documentary Requirements, 2019). Prior to this addition, the term “public charge” appeared in the code only three times (Part 212 - Documentary Requirements, 2017), and after, it was included 35 times (Part 212 - Documentary Requirements, 2019).

According to Makhoul and Sandhu (2020) “fewer than one percent of applicants for admission were denied” using the narrower public charge criteria that preceded the Trump presidency (p. 6), but that would soon change. In 2018, the DHS estimated that about 382,000 people seeking to adjust their immigration status each year would be subjected to a public charge review (Bleich & Fleischhacker, 2019, p. 505). As of 2019, the DHS anticipated that their

expanded public charge rule would “potentially exclud[e] many more non-citizens from becoming lawful permanent residents” (Makhlouf & Sandhu, 2020, p. 4). Indeed, Reuters reporters Torbati and Cooke (2019) made the case that revised public charge policy caused a significant increase in refusals of immigrant visa applications on public charge grounds. In 2015, before Donald Trump took office, fewer than 900 public charge-based visa denials were issued by the U.S. government, but after Trump’s expansion of public charge policy went into effect, “the refusals shot up... nearly 13,500 immigrant visa applications were refused on public charge grounds” (Torbati & Cooke, 2019).

Under the 2019 rule, immigrants were subject to an expanded public charge test that counted their use—or perceived likelihood of use—of non-cash and short-term safety-net benefits against them. According to the Fiscal Policy Institute’s (2018) brief about the new rule, “Only Wealthy Immigrants Need Apply,” these changes fundamentally altered the government’s approach to immigration by restricting access to green cards and various types of visas for immigrants based on their “family income” and their potential and/or past “use of health care, nutrition, or housing programs” designed to alleviate poverty (p. 1). Researchers from the Institute further argued that, “since the founding of the country, a family’s wealth was not a factor in determining their eligibility to immigrate to the United States,” but that, in acting as a kind of wealth screen for prospective immigrants, the new rule “will create devastating consequences for immigrant communities” and could even erode “the moral underpinnings of our country’s laws” (Dyssegaard Kallick et al., 2019, p. 1).

Although public charge policy specifically governs migration of foreign nationals within the United States, the consequences of expanding the public charge rule have not been limited to

the arena of admissions decisions. The mere proposal of public charge rule changes caused nearly 14% of adults in immigrant families (and more than 20% of adults in low-income immigrant families) to choose not to participate in government benefits programs in 2018 (Bernstein et al., 2019). This withdrawal from entitlement programs is called chilling, and according to Makhoul and Sandhu (2020), “the major effect” of the new rule has been “to chill” immigrants from participating in government services “out of fear of negative immigration consequences” (p. 1). Furthermore, chilling extends even to enrollment rates in benefits *not* subject to the public charge test, such as participation in services provided by nonprofits and in public schools for students and their families (Bleich & Fleischhacker, 2019). Low-income immigrants’ misunderstanding and fear of the new rule led to widespread under-enrollment in means-tested benefits and other programs perceived by immigrants to potentially threaten their path to legal residency.

Against the backdrop of this dramatic shift in American immigration policy, researchers began to study whether and to what extent the announced changes to the public charge rule had begun to affect immigrant communities. Because of the recency of these policy changes, there is, of course, room for lots of additional research to be conducted, but a few peer-reviewed studies (e.g., Barofsky, et al. (2020), Bernstein et al. (2019), Bleich & Fleischhacker (2019)) have begun to be published about chilling. The very first systematic investigation of potential chilling effects stemming from the planned expansion of the public charge rule was Bernstein et al. (2019)’s, conducted in December 2018, just two months after the rule change proposal was officially announced. The May 2019 publication of Bernstein et al. (2019)’s findings was the very first of its kind. Despite access to a few rich sources of information about the new rule and its

consequences, as of the writing of this thesis in December 2021, scholarly knowledge is relatively thin on the ground.

Nevertheless, we do know some of the sobering consequences that the change in policy had for low-income immigrants. One in four low-income adults in California reported avoiding public programs out of fear that participating would negatively impact their own immigration status or that of a family member (Protect Immigrant Families, 2021). This same study reported evidence that chilling was associated with adverse health outcomes, including higher food insecurity and uninsured rates, for immigrant households (Protect Immigrant Families, 2021). The Migration Policy Institute found that participation in safety-net programs declined far more rapidly for noncitizens than U.S. citizens during the Trump administration and that the share of children receiving these benefits fell twice as fast among U.S. citizen children with noncitizen household members than among children living only with citizens (Protect Immigrant Families, 2021). In particular, SNAP participation among mixed-immigration status households has dropped dramatically. These families' participation in SNAP has declined at a rate five times that of the decrease among citizen-only households (Protect Immigrant Families, 2021).

Besides studying benefits program participation rates, it is also possible to gauge immigrants' reactions to public charge policy change via focus groups, surveys, and interviews about their experiences. Protect Immigrant Families (2021) offers a summation of the Urban Institute's findings about these types of qualitative effects among immigrant families. Urban Institute researchers found that

... adults in low-income immigrant families had high rates of food insecurity in the past year (41.4 percent), and were worried about meeting their basic needs in the next month, including having enough to eat (43.2 percent) and being able to pay rent or a mortgage (50.8 percent), utility bills (49.1 percent), or medical costs (52.1 percent). Despite [this]..., more than 1 in 4 adults in low-income immigrant families (27.5 percent) reported they or a family member avoided non-cash benefits or other help with basic needs because of green card or other immigration concerns. (p. 2)

While a growing body of studies about the effects of public charge changes has begun to flesh out our understanding of the grim consequences of the new rule, the researchers we rely on to provide this information had to contend with a monumental barrier to producing scholarship. It is likely that the coronavirus pandemic, which hit the United States in March 2020 (mere months after the expanded public charge rule was officially published) has disrupted researchers' ability to pursue knowledge about the state of immigrant communities. Because the rule change produced the highest rates of fear and chilling among low-income noncitizens who are non-native speakers of English (Barofsky et al., 2020), conducting research about this vulnerable population is particularly challenging. Among the best potential research subjects are those immigrants most affected by chilling, but chilled immigrants are also the likeliest to avoid people perceived as being in positions of authority, such as researchers, program administrators, and human services workers (Bernstein et al., 2019). Of course, there may also be language barriers requiring extra resources and diligence to overcome, which is another challenge for academics interested in chilling effects.

## **How Language Barriers and Immigration Fears Fuel Under-enrollment in Benefits**

Among all of this evidence to suggest that the new rule is promoting poverty and poor health among immigrant communities, it is important to remember that access to English-language learning has the potential to ameliorate the suffering of low-income immigrants and their families. This is because people with better English skills are more likely to participate in programs such as SNAP, which are effective in alleviating poverty and hunger (Alger et al. (2006). Kaiser (2008) showed that, among immigrants who were non-native English speakers, “limited English ability” is a “proven barrier” to participation in such safety-net services (p. 1291). Cohen (2019) confirmed that immigrants who self-identify as having limited English proficiency see their English-language skills as a hurdle they struggle to overcome in order to participate in benefits programs, particularly in SNAP (p. 1647). The research of Alger et al. (2006) also argued that English-language ability encourages participation in anti-poverty programs. Their analysis proved that low-income clients with better English-language ability were more likely to receive the entitlement benefits for which they were eligible; conversely, they also found that those with limited English-language skills were less likely to receive benefits (Alger et al., 2006, p. 808).

English-language ability and immigration status both play a role in whether an eligible household is likely to participate in benefits programs. Kaiser (2008) conducted a study of women living in low-income immigrant households that likely included a U.S. citizen (either an adult family member who was a naturalized U.S. citizen and/or a U.S.-born child). Among these eligible households, foreign-born women were more likely than the native-born women to cite

reasons related to stigma, and, in particular, worry about potentially endangering their family's chances at U.S. citizenship, as their reason for not using SNAP benefits (Kaiser, 2008, p. 1291). Per Kaiser's (2008) research, such fears about immigration status changes, deportation, and/or family separation keep many eligible households from participating in poverty and hunger relief programs. This is concerning because Kaiser (2008) also found that families with the highest level of need for nutrition assistance (i.e., with the highest rate of food insecurity) were those who were most likely to cite worry about losing a path to U.S. citizenship as their reason for not applying for benefits (p. 1291).

Potential benefits recipients in the immigrant community, especially those who have a heightened fear of deportation and family separation, need strong English skills to navigate the social services system and to become informed about the benefits and potential drawbacks of participating in government-funded programs. If the new rule did, indeed, chill adult immigrants' participation in public ESL classes, it placed already vulnerable low-income households further at risk of poor health and financial outcomes and under-enrollment in benefits programs that could help (Bleich & Fleischhacker, 2019). Chilled immigrants' path toward English proficiency may have been obstructed by fears of immigration status consequences. If and how the 2019 rule affected immigrants' access to government-funded English language programs remains an open question. Through studying the intersection of the new rule and the ESL classroom, the education field will gain insight into how to promote low-income immigrants' ability to succeed in the United States via access to English-language learning, even during times of tumult in the world of immigration policy.

Interestingly, the DHS staff who wrote the expanded public charge policy insisted on their views about the importance of English-language proficiency among immigrants in documents related to their new rule. After the rule's public commentary period (October 2018-December 2018) ended, the DHS repeatedly addressed concerns from the public about how language proficiency evaluation during the public charge test could affect our immigration system. According to the DHS, they had plans to implement evaluation procedures to determine "evidence of the alien's and proficiency in English" as part of the expanded test, and that English skills would be "heavily weighted" in regard to test outcomes (Department of Homeland Security, 2019). Several members of the public who commented in opposition to the rule argued that such a language proficiency test was "discriminatory" and inconsistent with the United States' famously lacking a national language (Department of Homeland Security, 2019). In all, the back-and-forth between citizen commenters and DHS representatives about English proficiency as it relates to the proposed changes in inadmissibility policy totaled 19 pages of discussion (Department of Homeland Security, 2019), so it is clear that language ability was central to the public's and the administration's understanding of "public charge."

In their commentary, the DHS made a case completely in conflict with Algert et al., (2006), Kaiser (2008), and Cohen (2019)'s findings that limited English proficiency makes immigrants less likely to participate in safety-net programs. The DHS planned to empower immigration officers enforcing the new rule to cite low English-language proficiency in immigration case denial decisions, based on their assertion that immigrants with lesser English-language skills were more likely to become public charges. Per their commentary, the DHS claimed that "various studies and data support the concept that a person's education and



skills, including skills in the English language, are correlated to an individual's self-sufficiency and therefore [is] a positive factor” in immigrants’ public charge test results (Department of Homeland Security, 2019). This language echoes Bremberg’s (2017) insistence on rooting out any immigrants lacking in “self-sufficiency” among the body politic, in order to protect native-born Americans from a perceived drain on their collective resources.

The DHS’s insistence on privileging immigrants with better English-language skills on the grounds that immigrants with lower English proficiency are more likely to use public assistance—a claim that would leave Algert et al., (2006), Kaiser (2008), and Cohen (2019) begging to differ—does not seem to be borne out in the data. In their report of their comparatively recent findings titled “Food Over Fear: Overcoming Barriers to Connect Latinx Immigrant Families to Federal Nutrition and Food Programs,” the Food Research & Action Center (2020) reported that immigrant families who speak non-English languages at home continue to “often face language barriers and discrimination when accessing federal nutrition and food programs” (p. 5). As some commenters from the public argued, the way that the limited English proficiency of immigrants from countries where English is not spoken and where English-medium education is not available would be held against them by immigration officials may have come from motivations more prejudicial than economic.

### **Public Charge Policy as a Tool of Social Reproduction**

As might be expected, some groups of immigrants felt the chilling effects of the 2019 rule more than others, and it is imperative to acknowledge that the new rule and its turbulent rollout caused disproportionate harm among groups particularly burdened by social inequities.

For example, in their study of 2018 chilling among immigrants, Bernstein et al. (2019) found that Hispanic adults were “more than twice as likely as non-Hispanic white adults” to report chilling effects (p. 2); likewise, chilling effects were also twice as potent among low-income families with children in the home, as compared with adult-only households (p. 10). Consequently, we can see that the 2019 rule disproportionately harmed people already at higher risk of suffering poverty and its ill effects (e.g., members of non-white racial groups in a culture inflected by white supremacy, the children of low-income immigrants, etc.).

As a consequence of chilling, families already limited in their access to food and healthcare saw their resources spread even thinner once they forwent the in-kind public benefits that used to help them make ends meet. This positive feedback loop is a hallmark of Social Reproduction Theory (SRT), which posits that people with less social capital (such as people from a non-dominant racial group or people living in poverty) are likely to see their misfortune reproduced over time and across generations because of structural oppression (Marx, 1996).

Makhlouf and Sandhu (2020) echo Marx (1996)’s belief that this kind of replication is not an effect of chance; it is intentional among those who make the rules. These authors emphasize that the authors of 2018 proposal from the DHS admitted in the proposal’s text that they knew their new policy “might lead to disenrollment or forgone enrollment in safety-net programs among foreign-born noncitizens, as well as [among] U.S. citizens who are members of mixed-status households” (p. 506), including children. The DHS clearly anticipated that U.S. citizen children living with immigrant guardians would likely be harmed by the new policy

alongside their foreign-born household members, but nothing was done to shield these children from the fallout.

Several scholars have emphasized the massive scale of the number of families and children vulnerable to these intergenerational chilling effects. Bleich and Fleischhacker (2019) presented evidence that nearly nine in ten children in the United States living in a family with an immigrant parent are U.S. citizens (p. 506). These children, if they are living with limited means, are eligible for the public benefits that their country will continue to provide to their non-chilled counterparts living in native-born households. Makhoul and Sandhu (2020) frame of the sheer scope of potential chilling among mixed households thusly:

The Migration Policy Institute estimates that 10 million non-citizens, which is 47% of the non-citizen population in the United States, will disenroll from or forgo enrollment in public benefits because of the chilling effects of changes in public charge policy. These non-citizens reside with 12 million U.S. citizen family members... [and] forgone enrollment in public benefits by an individual affects the budget of the entire household. (p. 9)

Artiga and Damico (2018) of the Kaiser Family Foundation estimated that the number of children living in such mixed-status households at risk of chilling was nearly 20 million. They reported that California, the state where all of the community colleges studied in the course of preparing this thesis are located, holds the greatest share of potentially affected children in the nation. Per their findings, California is home to 23% of children living in the United States with at least one immigrant parent, and they calculate that over four million children in California live

in households at risk of “increase[d] strains” on family resources and “losses in health coverage” due to “changes to public charge policies intended to reduce use of public programs by immigrant families, including their citizen children” (Artiga & Damico, 2018, p. 1).

These authors, just like Makhoul and Sandhu (2020) would go on to do, raised the specter of “intentional” harm to immigrant families, for they find that chilling is no neutral force. Through social reproduction, chilling harms members of affected immigrant families by replicating significant barriers facing low-income immigrants among their citizen children, including under-enrollment in safety-net services, poverty, and poor health. This inequity begins at birth, as participation in SNAP is linked to significant improvements in birth outcomes; it continues throughout childhood, as SNAP recipients exhibit better academic learning during school-aged years; and it even continues into adulthood, as children who grew up with access to SNAP benefits enjoy better health as adults (Bleich & Fleischhacker, 2019, p. 506). Their disenrollment from safety-net benefits programs for which they are eligible deprives chilled children and their families access to services that would help promote their wellbeing, health, social mobility, and ability to achieve in school and in the workplace. The better life that many immigrant parents sought out by coming to America is being denied their citizen children via replicator effects.

Bleich and Fleischhacker (2019) joined Makhoul and Sandhu (2020) in highlighting text from the DHS’s 2018 proposal of rulemaking that conceded the authors’ anticipation of challenges that would follow their proposal, in this case, an increased poverty rate in the United States. The proposal text warned of “decrease[d] disposable income and increase[d] poverty” to come among immigrant families. Barofsky et al. (2020) would tend to agree with their

assessment because, according to these authors, one primary function of SNAP is to lift families out of poverty. This made their findings that the 2018 proposal catalyzed a stark decline in SNAP enrollment among eligible immigrants almost immediately after its announcement all the more troubling.

Despite the fact that, according to Bleich and Fleischhacker's (2019) analysis, "SNAP lifted 3.4 million people out of poverty [in 2017], half of whom were children" (p. 506), these authors argue that disenrollment from a different entitlement program could potentially wreak even more havoc among immigrant families. Bleich and Fleischhacker (2019) warn that a falloff in enrollment in state-sponsored health insurance programs like Medicaid, Medicare, and the Child Health Insurance Program "will increase the uninsured rate and reduce access to care," which, in addition to worsening health outcomes, will also increase poverty among immigrants who have been chilled, "because medical expenses are the largest contributor to increasing the number of individuals in poverty" (p. 506). Denying families an opportunity to escape poverty by discouraging their participation in safety-net programs proven to decrease and prevent poverty, especially among children, is how public charge policy reproduces social inequities among people who might otherwise have been given a fair shake at a better life.

Chilling caused by the 2019 rule represents social reproduction not only because of its intergenerational effects, but also because it replicated structural barriers to accessing the American safety net even among eligible adult populations *not* subject to the public charge test. Because of the fear, misinformation, and misunderstanding that clouded the announcement of the new rule, people who would seem to be invulnerable to the revised public charge test have nevertheless demonstrated significant chilling. Bernstein et al. (2019) found that, though the

observed rate of chilling across all adult immigrants was one in seven in 2018, among households where all foreign-born members were naturalized U.S. citizens, significant chilling was still present: one in eleven such households reported chilling in 2018 (p. 9). Confusion appears to have caused “spillover,” extending the chill’s reach and prompting disenrollment among exempt people (such as refugees and naturalized U.S. citizens, in addition, of course, to citizen children living in mixed-status households), despite their relative privilege in status (Bernstein et al., 2019, p. 13). Makhoul and Sandhu (2020) agree that, among those who were not subject to a public charge review, “a marked decrease in public benefits enrollment... attributed to the Trump administration’s proposed and enacted immigration policies” has been observed (p. 5).

Neither being born a U.S. citizen nor achieving citizenship through naturalization was enough to protect members of the immigrant community from the chilling effect’s dogged replication of inequities, which seems to have drawn more established members of immigrant communities back into a state of limbo regarding their right to persist and thrive in the United States. In this way, the new rule perpetuated immigrants’ vulnerability to falling between the cracks during their journey toward citizenship, pursuing them and their children into their lives as fully fledged citizens. Chilling caused by the new rule stood in for some immigrants’ former status as noncitizens ineligible for public benefits, and that this chilling encouraged non-participation among eligible citizens from immigrant backgrounds whose taxes help support the federal safety net is deeply unjust.

Similarly, just as chilling occurred both among people subject to the public charge test and those who were not, pervasive chilling effects drove disenrollment both from state-funded

benefits included in the public charge test—e.g., SNAP and Medicaid—and from services still absent from the expanded test (Bernstein et al., 2019). Due to “fear, confusion, and misinformation” (p. 506), Bernstein et al. (2019) reported that the new rule chilled immigrants’ participation in the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), which was never given public charge consideration by the expanded rule (probably because it is an anti-hunger program offered for the benefit of very young children: babies in utero and children up to the age of five years old). Bleich and Fleischhacker (2019) also found extensively chilled WIC enrollment among immigrant families, and they further observed avoidance of participation in services provided by nonprofits, which, as nongovernmental, charitable programs, remained irrelevant to public charge consideration. These findings suggest that immigrant families were not quite sure which programs to avoid, so they opted for non-participation in most or all services available to them. This certainly dovetails with the anecdotal evidence we at 18 Reasons began to see starting in 2018.

According to Cohen (2019), a 2018 survey of community-based organizations serving food-insecure immigrant communities found that intensified fears of immigration issues such as deportation inhibited their clients’ use of public benefits and of services such as food pantries offered by nonprofits. The present study examines whether enrollment in public ESL programs (yet another public service not governed by the new rule) also showed this kind of spillover chilling. Public ESL programs—being perceived by immigrants to be government-funded (as they often are) and/or subject to the public charge test (they are not)—could show shrunken enrollment correlated with milestones toward the adoption of the 2019 rule. Indeed, “many immigrant families are reportedly avoiding interaction with public authorities and dropping out

of or being reluctant to enroll themselves” in myriad public programs (Bernstein et al., 2019, p. 3), including community services. By eroding immigrants’ trust in public authorities and in support services provided by the nonprofit sector, the new rule widened existing holes in the safety net meant to support people residing in the United States and living with poverty.

Chilling was not bound by the limitations of the new rule, but rather, it infiltrated households of diverse makeup (including all-citizen households), and it also impacted participation rates among a diverse multitude of services (including benefits not subject to the public charge test). This chilling certainly had a “major impact on immigrants, their citizen family members, the providers who serve them, and their state and local communities,” as Manatt (2018) anticipated it would at the time. Their fear-based disinclination to engage with the public and nonprofit sectors left some low-income immigrants with nowhere to turn for much-needed support. Migration scholar Ibrahim Sirkeci (2009) may have anticipated this kind of confusion in his paper “Transnational Migration and Conflict.” Sirkeci (2009) describes migration as a “conflict-space” replete with many challenges for immigrants to the United States, including poor infrastructure among service agencies, fear of persecution, and miscommunication (p. 8). The DHS’s expanded public charge rule exacerbated these issues, leaving low-income immigrants struggling anew to find their footing and achieve financial stability under the Trump administration.

Manatt (2018) provided a data dashboard presenting the relative strength of chilling effects among immigrant households of different income levels. As the public charge test specifically sought to root out immigrants who might become eligible for and, in the Trump administration’s eyes, overly reliant on means-tested benefits, one might predict that the neediest



families would be the most affected by chilling. Manatt (2018) showed that this was the case: “while all noncitizen families may be dissuaded from using benefits regardless of their current observed income level, lower-income families are most likely to forgo benefits.” Specifically, they found that immigrant families below 250% of the federal poverty level (FPL) (for reference, in 2018, the federal poverty level was set at \$12,140 for individuals, increasing by some \$4,320 for each additional person) showed the strongest signs of chilling (Manatt, 2018).

In total, there were 13.9 million noncitizens residing in the United States in 2018 and living below 250% FPL. Manatt (2018) calculated that, among all immigrant families, these noncitizens and their additional 12 million household members living together in low-income households were significantly more likely to experience chilling than higher-income immigrant households, including those households who made above 250% FPL but were still eligible for some benefits. Among these nearly 26 million potentially affected families living below 250% FPL, “the group at greatest risk is the 7.5 million noncitizens, and the total universe of 14 million noncitizens and their family members, below 125% FPL” (Manatt, 2018). Inherent to its design, expanded public charge policy spiked poverty risk with the greatest force among the immigrant families with the fewest resources, which, again, is an example of the compounding effects of social reproduction described by Marx (1996).

Finally, if we have paid attention to the history lessons that Hirsu (2018) and Hester et al. (2018) offered, we might be able to describe another critical way in which chilling stemming from expanded inadmissibility policy was unequally represented across the immigrant population: chilling effects have been stronger among non-white immigrants (and among Hispanic immigrants, in particular). In the same way that Bernstein et al. (2019) found two-fold

stronger chilling among Hispanic immigrants (as opposed to non-Hispanic white immigrants), Haley et al., (2021) reported that Hispanic families with noncitizens continued to demonstrate comparatively high rates of chilling under the Biden administration, and that they “disproportionately experience hardships” (p. 5) related to poverty.

The National Immigration Law Center (2019), which sued the Trump Administration on the grounds that its 2019 public charge rule was in violation of Equal Protection under the Fifth Amendment of The United States Constitution, argued that “because affected immigrants are overwhelmingly immigrants of color, the rule is... expected to widen racial disparities.” This latter idea of augmenting existing inequities fits right in with social reproduction theory. Furthermore, the fact that the new rule hampered non-white immigrants, in particular, shows us yet another example of inadmissibility policy supposedly focused on income level alone actually separating immigrants according to racial boundaries.

The 2019 rule was not a race-neutral policy, and in that way, it continued the long legacy of the racialized enforcement and effects of federal inadmissibility policy. "Used for centuries to control immigration from Ireland and other European countries," Hirsi (2018) argued, “the public charge provision now primarily restricts immigration from Africa, Asia, Latin America and the Middle East.” In his *Washington Post* op-ed “We Must Abolish the Public Charge Rule,” immigration attorney Christopher Richardson (2019), a former State Department consular officer and diplomat, does not mince words: “the public-charge provision has long been a weapon of racism and classism in the United States,” and in his view, “far from its [being] expan[ded], the rule should be abolished as a relic of the bygone era from which it came.” As Gessen (2020)

titled their *New Yorker* column about the new rule: “Trump’s Immigration Rule Is Cruel and Racist—But It’s Nothing New.”

What *is* new is the language that we now have to describe racism in the United States and the collective reckoning our country has been going through regarding its white supremacist roots over the past few years. These factors supported the removal of the 2019 rule from the Federal Register in early 2021 under the nascent Biden administration. Although a federal investigation of the 2019 rule’s inherently unjust implications was launched via a 2021 Biden Executive Order and not as a direct result of their lawsuit, the National Immigration Law Center (2019) made excellent use of rhetoric about our American ideals to call out this racist policy while Trump was in office:

As indicators of a motivating racial animus, the complaint cites the [Trump] administration’s acknowledgement that the policy will have a disparate impact on families of color, President Donald Trump’s own racist statements, and his administration’s other racially-biased policies... The Trump administration has deliberately designed this policy to target families of color, which is part of its overall blueprint to change the face of what we look like as a nation and who is considered worthy of being an American. It threatens immigrants of color with exclusion and Americans of color with deprivation or family separation. And it aims to deny working-class immigrants of color the ability to thrive in the land of opportunity.

Their rhetoric was evocative of the “Great American Melting Pot,” as it was couched in terms of the opportunity-based patriotism that often plays well among legislators of both political parties.

This same rhetorical approach would ring throughout the 2021 Executive Order that spelled the 2019 rule's end. Were it to truly afford equal opportunity to Americans of all colors and all countries of origin, U.S. federal law would no longer be an agent of the social reproduction of disparate inequities for people and immigrants of color that it so often is.

### **Repealing the Expanded Public Charge Rule**

In evaluating President Joe Biden's performance so far against his promised corrective immigration agenda, Loweree and Reichlin-Melnick (2021) of the American Immigration Council were gratified that Biden made repealing the 2019 public charge rule a priority for his first 100 days in office. Shortly after taking office, on February 5, 2021, Biden issued an Executive Order directing his Secretary of State, Attorney General, and Secretary of Homeland Security to "address concerns about the current public charge policies' effect on the integrity of the Nation's immigration system and public health" within 60 days of the Order (Exec. Order No. 14012, 2021). For a list of the legislative milestones important to the removal of the 2019 public charge rule and relevant dates, see **Appendix F**. The Executive Order was titled "Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans," and it is notable that the order began with an invitation to "celebrate" immigrants' contributions to U.S. culture, achievements, and economic power (Exec. Order No. 14012, 2021). In this author's view, Executive Order 14,012 was clearly intended as a foil to the Bremberg (2017)'s leaked Executive Order draft that debuted in the earliest days of the Trump presidency and that so callously elided the many ways that immigration benefits the United States.

Executive Order 14,012 promised to the “40 million foreign-born individuals [who] live in the United States today” that Biden’s administration would reevaluate immigration policies passed during the previous administration in order to be “consistent with our character as a Nation of opportunity and of welcome,” as “it is essential to ensure that our laws and policies encourage full participation by immigrants... in our civic life” (Exec. Order No. 14012, 2021). In the text of the Order, Biden explained that his motivation in its issuance was to ensure that “immigration processes and other benefits are delivered effectively and efficiently; and that the Federal Government eliminates sources of fear and other barriers that prevent immigrants from accessing government services available to them” (p. 8277). In this way, the Biden administration clearly signaled its intention to rewind the public charge policy changes that resulted in dramatic under-enrollment in public benefits and mistrust of government agents among immigrant communities.

The conclusions of the legislative review ordered by Biden were swift in coming, and they resounded with disapproval for the expanded public charge test. Per the Secretary of Homeland Security’s remarks about the results of his department’s review, continuing to defend the 2019 rule was “neither in the public interest nor an efficient use of limited government resources” (Renaud, 2021). Tracy Renaud (2021), a senior DHS official, paraphrased their findings on March 9, 2021 as follows:

The 2019 public charge rule was not in keeping with our nation's values. It penalized those who access health benefits and other government services available to them [and]... created confusion and fear that may have prevented immigrants and their families,

including their children, from accessing critical government services available to them ... for which they may be eligible to keep their families safe and healthy. (p. 1)

On account of these findings by the reviewers, within a month of the Executive Order 14,012's issuance, the Department of Justice dropped its defense of the Trump-era public charge rule, leading to the dismissal of all pending immigration cases related to public charge-based denials and deportations that hinged on temporary, in-kind benefits use (Immigrant Legal Resource Center, 2021). As a result, U.S. Citizen and Immigration Services also stopped applying the 2019 rule in their dealings with immigrants, and the enforcement of the expanded public charge rule can thus be described as having been vacated in its entirety (Immigrant Legal Resource Center, 2021). Enforcement of the 2019 rule ceased by March 9, 2021, and the only thing left for the Biden administration to do to fulfill its mandate to reevaluate public charge policy was officially remove evidence of the 2019 rule from the Federal Register.

On March 15th, 2021, in order to redress the disastrous political and humanitarian consequences of the expanded public charge test, federal staff charged with reviewing the law and acting to restore its "integrity" (Exec. Order No. 14012, 2021) simply wiped the offending legislation from the books (Part 212 - Documentary Requirements, 2021). This straightforward reversal of statute was consistent with the Department Homeland Security's announcement from the previous week, in which they declared that they would be applying public charge inadmissibility policies consistent with the *1999 Field Guidance* once again (Renaud, 2021). Accordingly, the Trump administration's additions to Title 8 law governing immigration (specifically, this was Part 212, Sections 20-23 about the applicability of public charge inadmissibility, relevant definitions, public charge inadmissibility determination, and exemptions

and waivers for public charge grounds of inadmissibility, respectively) were eliminated. The number of mentions of the term “public charge” shrunk back to their Clinton-era number: just three mentions (as opposed to 35 under Trump) (Part 212 - Documentary Requirements, 2021).

Though the Biden administration’s wholesale rejection of the 2019 rule was encouraging to advocates for the immigrant community, they felt that the work to address harm among immigrant families was not yet finished. Biden’s team clearly heeded pleas from community advocates like Protect Immigrant Family’s (2021) appeal for “swift rulemaking,” (p. 1) but answering their call for the government to provide effective “communication to immigrants and their family members that they can feel safe accessing public services” (p. 2) would prove more challenging. Per Protect Immigrant Families (2021), their constituents were not yet aware and/or may not have yet fully believed that Trump’s public charge policy “ha[d] permanently ended and immigrants and their family members can get the care and help they need” (p.2). Despite the DHS’s commitment to “partner with federal agencies to ensure impacted individuals are aware” of the change (Renaud, 2021, p. 2), the sheer amplitude of the fear and chaos surrounding the development of the 2019 rule will be a difficult hurdle to overcome. Media coverage of the 2019 rule’s development and adoption was extensive, but the repeal of that rule seems to have made far fewer waves, so intentional community outreach will be required to educate chilled communities. Advocates for immigrant communities, including TESOL practitioners, should be prepared to mitigate the damage done by the 2019 public charge rule to the best of their ability.

## Chapter II Summary

This review of literature has explored the history of the public charge rule, what changes to public charge policy under President Clinton and President Trump entailed and how they created “chilled” immigrant communities, how limited English-language proficiency affects families’ ability to access safety-net services, the public charge rule as a driver of intergenerational inequities among immigrant families, and the ultimate removal of the expanded public charge rule under President Biden. An exploration of these themes provides the reader with an informed lens through which to consider possible chilling effects among ESL program participants. Forgone enrollment in public ESL programs promotes worse English-language proficiency among adult immigrants, which, in turn, reduces benefits enrollment among immigrant families, making poverty alleviation for these families and their children less likely. This thesis will address the current gap in the literature about whether immigrants’ chilled use of community services and means-tested benefits related to public charge rule changes also extended to their participation in public adult ESL classes.



## **CHAPTER III RESULTS**

### **Introduction**

This chapter describes the findings of a statistical study of enrollment rates in ESL programs at community colleges throughout California conducted to surface possible chilling effects among adult ESL students correlated with recent expansions of inadmissibility policy. Discussion of the results, including contextualizing the findings and exploring recommendations inspired by them, appears in Chapter IV.

The present study analyzed community college enrollment records from academic years 2015-2019 to determine whether there was a statistically significant difference in enrollment change among students in ESL programs versus those in non-ESL programs for any year. A further analysis of enrollment change among specific student subcategories (by ethnicity and by socioeconomic status) was also undertaken to determine whether chilling was more common among certain student subgroups (e.g., Hispanic students), as compared with students not in that category (e.g., combined students of all non-Hispanic ethnicities). Statistically significant disenrollment trends would indicate chilling for ESL programs.

This study is needed because the field does not yet have any other published information about whether recent changes to inadmissibility policy under President Donald Trump (which caused significant chilling of immigrants' participation both in programs included in the new public charge test and in programs *not* included) were correlated with similar declines in participation in ESL. Despite the fact that public ESL education is a state-sponsored service that

does not count against immigrants hoping to avoid public charge-based denials, chilling of ESL participation could mirror chilling observed in programs like K-12 school-based services, which also declined during the very public commotion about Trump-era public charge policy changes.

In brief, the study showed a trend toward overall student disenrollment from ESL programs at community colleges for the 2016 and 2018 academic years, but the difference in overall enrollment between ESL and non-ESL programs was not statistically significant.

In contrast, when comparing enrollment change distributions for students belonging and not belonging to certain demographic subcategories, and of their use of ESL and non-ESL programs, statistical analysis showed meaningful dips in enrollment in 2016 and 2018 for Hispanic ESL students; ESL students of color, more generally; and low-income ESL students. In 2016, chilling was strongest among Hispanic ESL students ( $p=0.0002$ ), followed by low-income ESL students ( $p=0.0032$ ), then all ESL students of color ( $p=0.0375$ ). In 2018, chilling was again strongest among Hispanic ESL students ( $p=0.0005$ ), but ESL students of color showed the next-strongest effect ( $p=0.0269$ ), and low-income ESL students followed them ( $p=0.0466$ ).

### **Findings: Research Question 1**

**Question 1:** *During recent changes to public charge policy under the Trump administration, did adult immigrants' rates of participation in ESL programs at community colleges in California chill, as did their participation in federal means-tested benefits?*

**Findings:** The answer to the first research question is no, there was not a statistically significant chilling of overall ESL program enrollment under the Trump administration. In the case of

overall participation rates in ESL versus non-ESL programs, the null hypothesis—that adult immigrants’ overall use of public ESL classes was *not* chilled—prevails.

**Table 1**

*Overall Enrollment Trends in ESL Programs and Non-ESL Programs, 2015-2019*

Academic Year	ESL Z_mean*	Non-ESL Z_mean*	ESL Z_stddev	Non-ESL Z_stddev	T-test P-value	T-test Statistic
2016	-0.0410	0.1681	1.2025	0.9932	0.2573	-1.1375
2017	0.0833	-0.0679	1.0232	0.9815	0.3614	0.9156
2018	-0.2184	0.0275	0.9457	1.0240	0.1394	-1.4867
2019	-0.1065	-0.2406	0.9958	0.8153	0.3815	0.8780

*Note.* Results of the statistical analysis of community college enrollment data for all students per program type (ESL versus non-ESL). Negative means represent enrollment shrinkage, and positive means show program growth. These numbers represent the change in enrollment from the previous academic year to the listed year.

Upon analyzing the z-scores representing year-over-year changes in enrollment, there was not a statistically significant difference in overall enrollment changes for ESL programs, an education service specifically for immigrants, as compared with non-ESL programs. Even though, on average, there was a downward trend in ESL program enrollment for academic years 2016 and 2018 (both were years in which non-ESL programs showed enrollment growth), the difference was not significant. As we can see in **Table 1**, no *p*-value found was less than 0.05, but the ESL enrollment drop in 2018 showed the strongest trend towards significance ( $p=0.1394$ ).

## Findings: Research Question 2

**Question 2:** *Were possible chilling effects in ESL program participation stronger for any specific demographic subgroup of adult ESL students, especially in subgroups already proven to show more chilling under the Trump administration (such as Hispanic people, people of color, and low-income people)?*

**Findings:** The data show that yes, for the years 2016 and 2018, there was a significant difference (ESL vs. non-ESL) in enrollment change for Hispanic students, students of color, and low-income students, all of whom were disproportionately unlikely to enroll in ESL during these years. In contrast, there was not a significant difference in enrollment by program type for non-Hispanic students, white students, or higher-income students. So, the data indicate a chill of adult immigrants' use of public ESL classes for Hispanic, non-white, and low-income students, respectively. Statistically significant enrollment change was present only for 2016 and 2018 data, so 2017 and 2019 numbers are not included in this chapter. See **Appendix E** for a full list of statistical results for all years.

### Enrollment Trend Differences among Hispanic and Non-Hispanic Students

Enrollment trend data for Hispanic and non-Hispanic students are presented in **Table 2**. In 2016, there was a statistically significant difference ( $p=0.0002$ ) in enrollment among Hispanic ESL students, as compared with Hispanic students' enrollment in non-ESL programs (see **Figure 1**). On average, Hispanic enrollment in ESL programs stayed about the same, whereas Hispanic enrollment in non-ESL programs grew significantly, indicating chilling. There was also a

statistically significant trend ( $p=0.0005$ ) toward chilled enrollment among Hispanic ESL students versus Hispanic students not in ESL programs in 2018 (see **Figure 2**). On average, Hispanic students' enrollment in ESL programs declined in 2018, whereas Hispanic students' participation in non-ESL programs actually grew that year. In contrast, there was not a significant difference in enrollment rates for either year among a composite total of all non-Hispanic students, meaning that non-Hispanic enrollment was not chilled.

**Table 2**

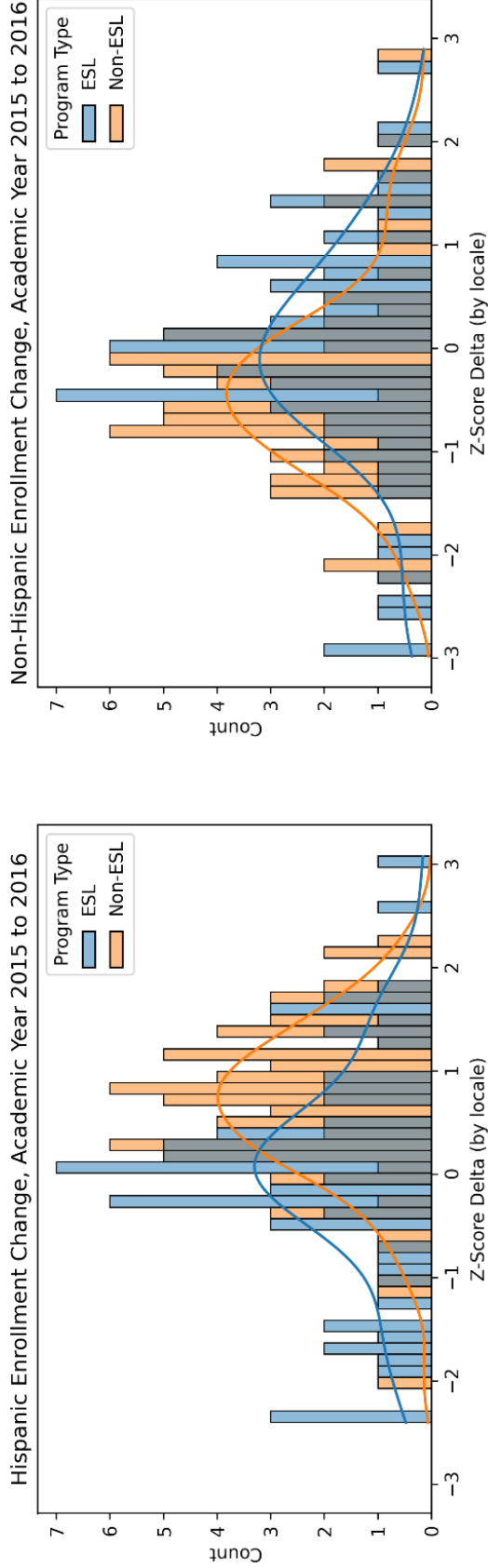
*Enrollment Change among Hispanic and Non-Hispanic Students*

Academic Year	Category	ESL Z_mean*	Non-ESL Z_mean*	ESL Z_stddev	Non-ESL Z_stddev	T-test P-value	T-test Statistic
2016	Hispanic	0.0555	0.6737	1.1163	0.7880	0.0002	-3.8389
2016	Non-Hispanic	-0.0822	-0.2620	1.1373	0.9864	0.3127	1.0132
2018	Hispanic	-0.1607	0.3693	0.9683	0.7765	0.0005	-3.5980
2018	Non-Hispanic	-0.3002	-0.1878	0.9057	0.9185	0.4641	-0.7342

*Note.* Data from the statistical analysis of community college enrollment rates among Hispanic and non-Hispanic students in ESL versus non-ESL programs. Negative means represent enrollment shrinkage, and positive means show program growth. These numbers represent enrollment change from the previous academic year to the listed year.

**Figure 1**

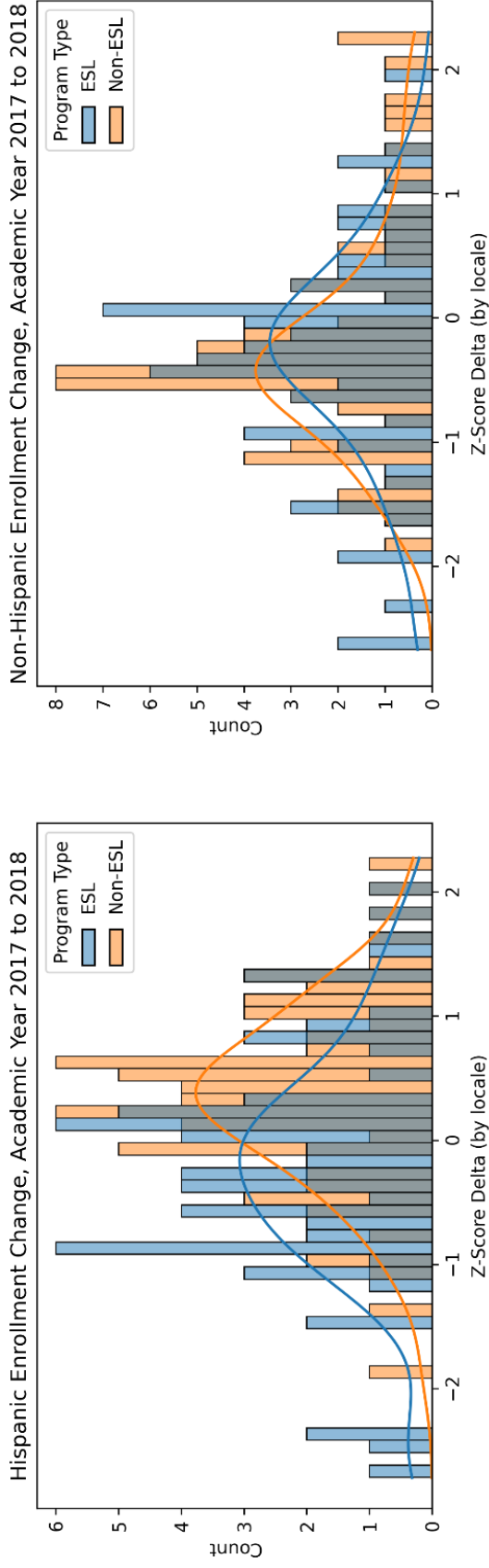
*2016 Enrollment Change among Hispanic and Non-Hispanic Students*



*Note:* On the left, we see lesser growth in enrollment among Hispanic ESL students as compared with participation rates for Hispanic students in non-ESL programs in 2016, which actually grew. On the right, we see no significant difference between enrollment rates for non-Hispanic ESL students and their counterparts in other programs that year. Enrollment for non-Hispanic students modestly declined at relatively consistent rates across both program types.

**Figure 2**

*2018 Enrollment Change among Hispanic and Non-Hispanic Students*



*Note:* On the left, we see a drop in enrollment among Hispanic ESL students in 2018, while the enrollment of Hispanic students in other programs actually grew that year. In contrast, the right histogram depicts that non-Hispanic students' participation in community college programs of all kinds slightly declined in 2018, without significant enrollment differences per program type.

### Enrollment Trend Differences among Students of Color and White Students

Per statistical results presented in **Table 3**, there was a statistically significant ( $p=0.0375$ ) rate of disenrollment among immigrants of color during the 2016 school year, as compared with participation among students of color in non-ESL programs at that time (see **Figure 3**). Being an ESL student of color had an even stronger effect ( $p=0.0269$ ) on 2018 disenrollment trends than in 2016 (see **Figure 4**). For both of these years, chilling resulted in a decline in participation of students of color in ESL classes; meanwhile, average participation rates of students of color in other kinds of programs actually grew in both 2016 and 2018, indicating chilled ESL participation. Data about white students did not show significant differences in their enrollment per program type, so their ESL participation rates were not chilled during this time.

**Table 3**

#### *Enrollment Change among Students of Color and White Students*

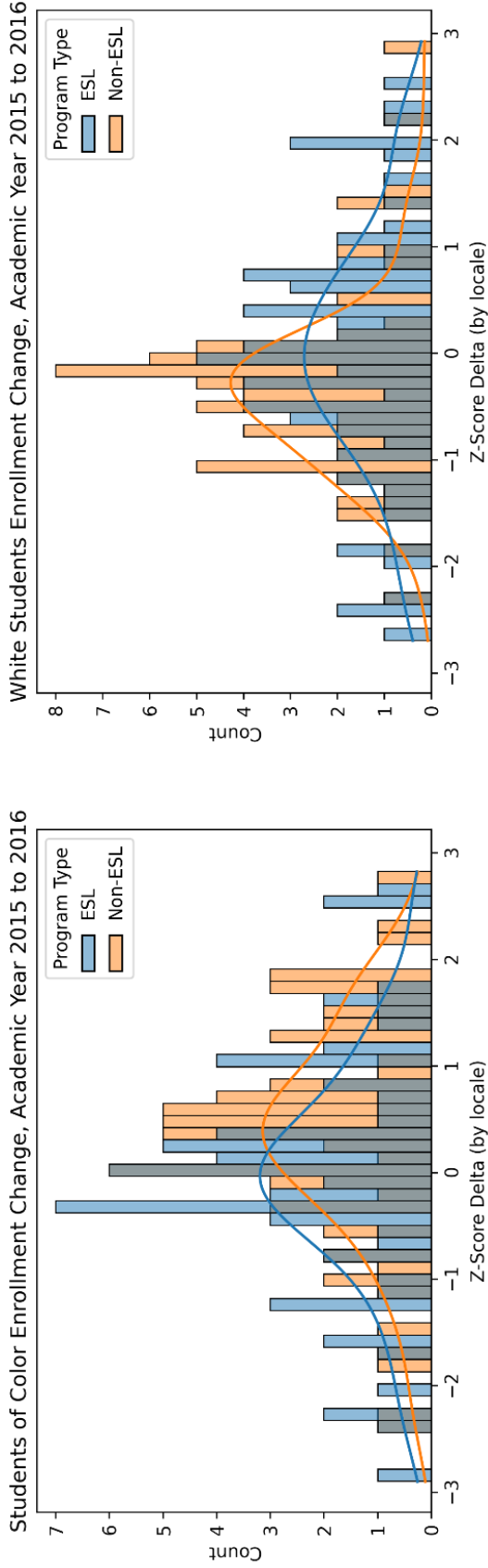
Academic Year	Category	ESL Z_mean*	Non-ESL Z_mean*	ESL Z_stddev	Non-ESL Z_stddev	T-test P-value	T-test Statistic
2016	Ss of Color	-0.0102	0.3813	1.1356	1.0691	0.0375	-2.1003
2016	White	-0.0077	-0.2780	1.1887	0.8754	0.1280	1.5321
2018	Ss of Color	-0.2553	0.1105	0.9685	0.9664	0.0269	-2.2373
2018	White	-0.1542	-0.1709	0.9611	0.6910	0.9059	0.1184

*Note.* Enrollment data analysis results for students of color and white students in ESL and non-ESL community college programs. Negative means represent enrollment shrinkage, and positive means show program growth. These numbers represent enrollment change from the previous academic year to the listed year.



**Figure 3**

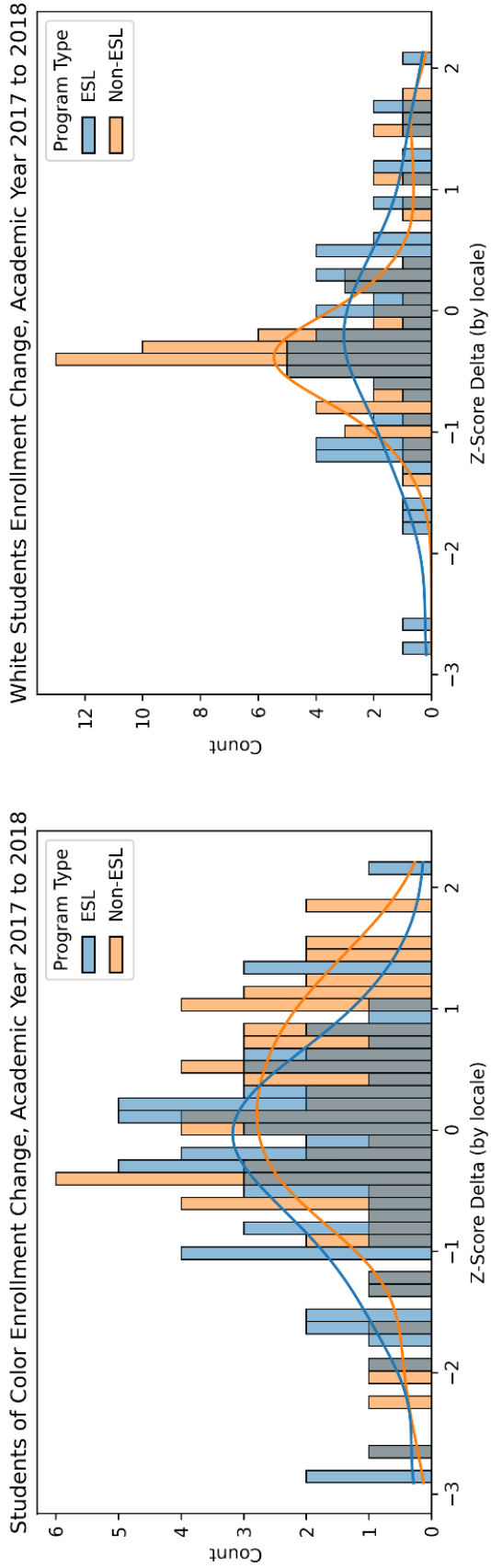
*2016 Enrollment Change among Students of Color and White Students*



*Note:* The left histogram depicts a trend toward disenrollment among ESL students of color in 2016, as compared with growing rates of participation in other types of community college programs among students of color that year. There was no significant difference in white students' enrollment by program type in 2016, as depicted on the right. White students' enrollment modestly declined across both program types at a similar rate that year.

**Figure 4**

*2018 Enrollment Change among Students of Color and White Students*



*Note:* The left histogram again shows a pattern of participation decline among ESL students of color in 2018, which stands in contrast to the growth of non-white students' participation in other kinds of programs that year. The histogram on the right shows the slight decrease in enrollment of white students across both program types in 2018, which did not display any significant difference in disenrollment rates by program type.

### Enrollment Trend Differences among Low- and Higher-Income Students

A comparison of enrollment change among low-income students (those who qualified for the federal Perkins Loan Program) and higher-income students (those who were ineligible) is presented in **Table 4**. There was a statistically significant ( $p=0.0032$ ) drop in enrollment rates among low-income ESL students in 2016, as compared with low-income students enrolled in other programs, whose enrollment actually grew that year (see **Figure 5**). In addition, there was also a statistically significant ( $p=0.0466$ ) downtrend in enrollment among low-income ESL students in 2018, but this latter effect was not as strong as the effect in 2016 (see **Figure 6**). For both of these years, higher-income students did not show significant differences in enrollment trends per program type, meaning that their enrollment data did not exhibit chilling.

**Table 4**

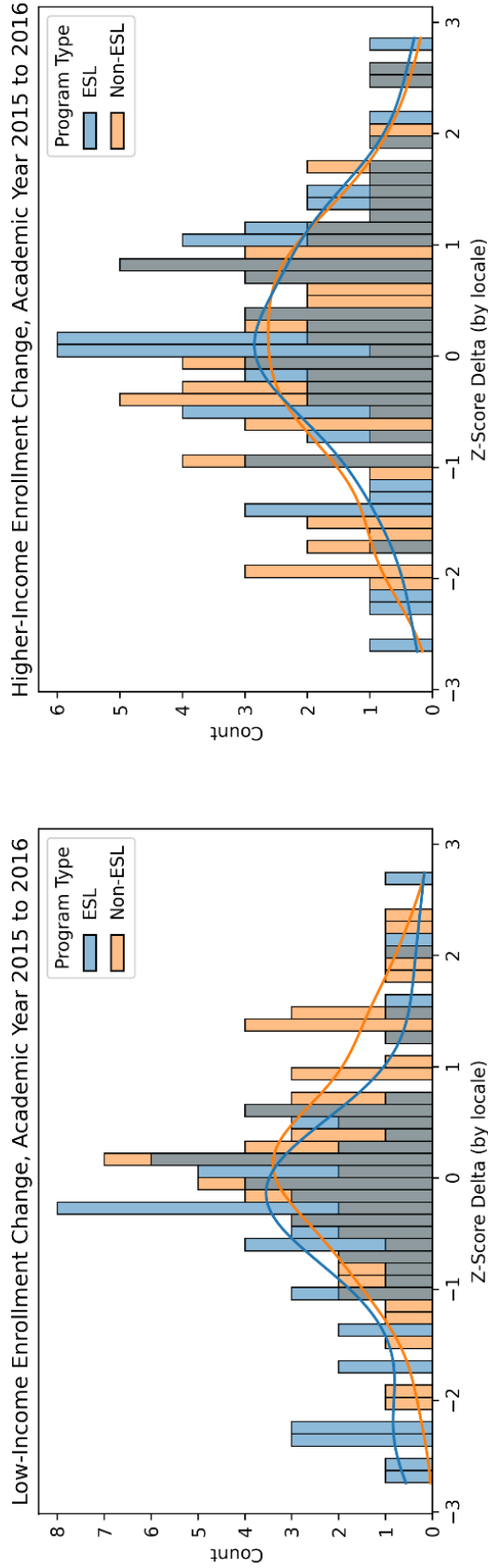
#### *Enrollment Change among Low- and Higher-Income Students*

Academic Year	Category	ESL Z_mean*	Non-ESL Z_mean*	ESL Z_stddev	Non-ESL Z_stddev	T-test P-value	T-test Statistic
2016	Low-Income	-0.2949	0.2140	1.0872	0.9441	0.0032	-2.9987
2016	Higher-Income	0.2138	0.1175	1.1184	1.0845	0.6007	0.5245
2018	Low-Income	-0.3147	-0.0311	0.8114	0.8712	0.0466	-2.0074
2018	Higher-Income	-0.0859	0.1617	0.8851	1.0859	0.1387	-1.4896

*Note.* Statistical analysis results showing enrollment change trends among low- and higher-income students in ESL versus non-ESL programs at community colleges. Negative means represent enrollment shrinkage, and positive means show program growth. These numbers represent enrollment change from the previous academic year to the listed year.

**Figure 5**

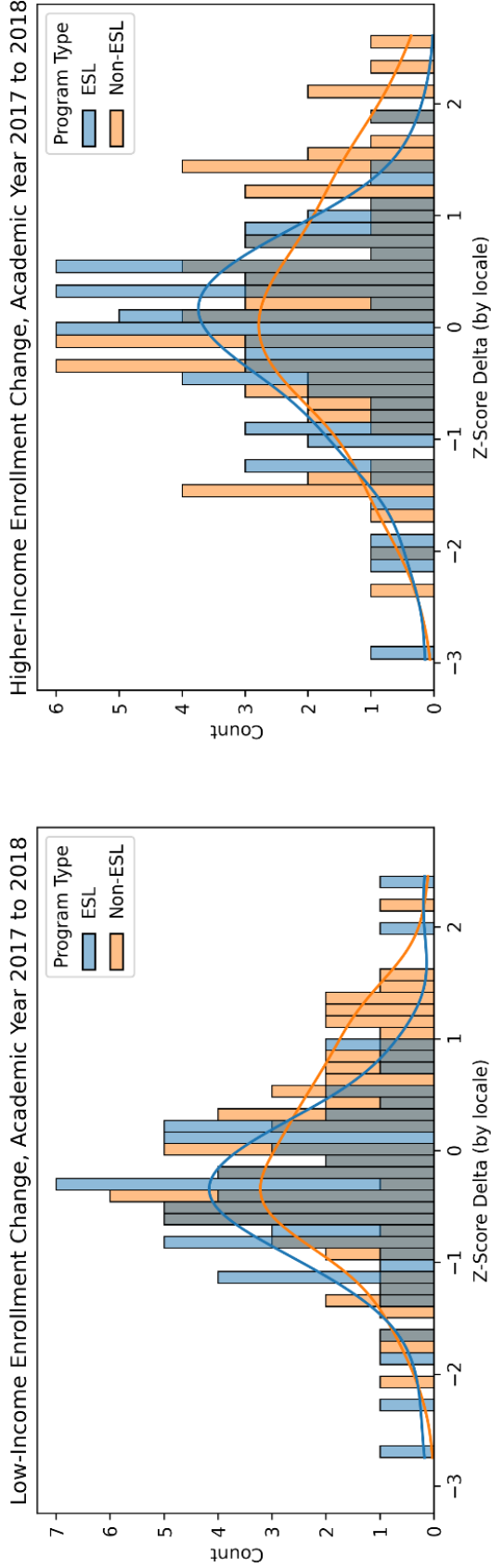
*2016 Enrollment Change among Low- and Higher-Income Students*



*Note:* On the left, we see that low-income students' participation in ESL programs shrunk in 2016. Meanwhile, low-income students' enrollment in non-ESL programs actually grew that year. In contrast, as shown in the right histogram, there was no significant difference between higher-income students' enrollment rates in ESL and non-ESL programs, both of which modestly increased in 2016.

**Figure 6**

*2018 Enrollment Change among Low- and Higher-Income Students*



*Note:* On average, low-income students' participation in both community college program types shrunk in 2018, but the trend toward low-income disenrollment from ESL programs, in particular, was significantly strong. Higher-income students' participation in ESL programs also shrunk in 2018, while their enrollment in non-ESL programs actually grew; however, there was not a significant difference in enrollment patterns for higher-income students by program type. Thus, higher-income students' enrollment in public ESL classes was not significantly chilled.

### Chapter III Summary

Statistical analysis of enrollment records for ESL and non-ESL programs at California community colleges during the Trump presidency revealed that there was no significant chilling of *overall* student participation among adult immigrants in ESL programs. On the contrary, three ESL student subgroups did demonstrate statistically significant chilling in 2016 and 2018: Hispanic ESL students; ESL students of color, more generally; and low-income ESL students. These types of immigrant language-learners did, indeed, demonstrate chilled participation in ESL programs for these years.

## **CHAPTER IV DISCUSSION, CONCLUSIONS, AND RECOMMENDATIONS**

### **Introduction**

Chapter IV presents a discussion of the findings discovered through statistical analysis of enrollment data for ESL and non-ESL programs in community colleges throughout California, conclusions that can be drawn from these findings, and recommendations for how the work of understanding and ameliorating chilling effects among adult immigrants might be continued in the future. Reading Chapter IV will help this study's audience contextualize statistical findings in relation to ideas presented in Chapter II about diverse documented chilling effects observed among adult immigrants under the Trump Administration, the concept of social reproduction of inequity via exclusion policies, and the history of the public charge rule from the 1880s onward. To reflect on the purpose of the present study, readers should consider how understanding chilling effects among immigrant families (and, in the case of this thesis, adult ESL students most especially) will empower TESOL practitioners, community advocates, and policymakers with knowledge about how student populations may react to shifting inadmissibility policy.

### **Discussion and Conclusions**

The present study can tell us four things about chilling effects regarding enrollment changes in ESL programs at community colleges throughout California: (1) there was not a significant, program-wide chilling effect on adult immigrants in public ESL programs during the Trump administration. Despite the lack of significant chilling on *overall* enrollment numbers, for the years 2016 and 2018, (2) Hispanic immigrants' participation in ESL programs was

significantly chilled, (3) as was participation in ESL programs among immigrants of color, and (4) as was low-income immigrants' participation in ESL programs.

This analysis substitutes the category “immigrants” for the word “students” often used throughout Chapter III (e.g., “Hispanic immigrants” instead of “Hispanic ESL students”) because this study makes the assumption that adults enrolled in public ESL classes are immigrants residing in the United States. To call these students “immigrants” does not imply any knowledge of their residency status; “immigrants” is used here to include people such as lawful permanent residents, visa holders, and undocumented residents (as does the literature reviewed throughout Chapter II). It is the author of this study’s opinion that non-immigrants are unlikely to attend public ESL programs for adults.

These findings mirror the data presented in studies reviewed in Chapter II in at least two ways: in the timing of chilling, and in the populations showing the most significant chilling. In terms of timing, researchers such as Barofsky et al. (2020), Bernstein et al. (2019), Sommers et al. (2020), and Bleich and Fleischhacker (2019) all found significant chilling in the year 2018, likely because the expansion of the public charge rule was announced that year. Even before the rule was officially announced in October 2018, public charge policy had become a hot topic in news media throughout the United States that year. This was due, in part, to the highly publicized 60-day public commentary period from October through December 2018. As previously mentioned, 260,000 individuals and organizations left comments for the DHS about their reactions and recommendations regarding the new rule, most of them in opposition of the proposed changes to standing public charge policy (National Immigration Law Center, 2019). It must be emphasized in the context of the current study’s findings that chilling in 2018 was



*correlated* with the timing of the official announcement of the new rule and the public commentary period that followed, but we cannot infer any kind of *causal* relationship between these events and related chilling.

One might wonder why chilling occurred in 2018, well before the rule was set to take effect in August 2019. As per findings by the American Public Health Association (2018), SNAP participation rates among immigrants plummeted in 2018 despite the fact that eligibility rules for SNAP remained unchanged between 2017 and 2018. The Association (2018) argued that the mere “threat of policy changes, even before changes are enacted, may be causing families to forego nutrition assistance.” Eligible immigrants’ participation in SNAP had modestly but steadily increased during the years 2007-2017, and the Association (2018) believed that the sudden drop in enrollment in 2018 might be explained by immigrants’ exposure to media coverage of immigration issues.

The “nuanced changes in national immigration rhetoric and increased federal action to deport and detain immigrants” drove immigrants to avoid SNAP and other benefits programs starting in 2018 (American Public Health Association, 2018). This concept of a growing awareness of inadmissibility policy among immigrants was also borne out in a study by Sommers et. al (2020) about low-income Texans: nearly three out of five low-income Texans had heard of the public charge rule in 2018, and one in eight had avoided public programs or medical care because of immigration-related concerns. It seems that Hispanic, non-white, and/or low-income immigrants in California may have also had this awareness in 2018, as this study found evidence of chilling among ESL students that aligns with other studies’ findings of

chilling among immigrants formerly enrolled in SNAP, WIC, Medicaid, and other public programs.

On the other hand, the present study also found evidence of chilling among adult immigrants' enrollment in ESL programs in 2016. Though I have not seen other studies that replicate my findings of significant chilling in that year, I will hazard a guess that chilling among ESL students was related to the 2016 election of Donald Trump and dawning fears of the family separations and deportations promised by an impending “crackdown” on immigrants. The National Immigration Law Center (2019) placed chilling in a broader milieu of “racial animus” against people of color on the part of the Trump campaign, citing Donald Trump’s own “racist statements, and his administration’s other racially-biased policies,” so it is possible that the mere election of President Trump was enough to kick off avoidance of educational and other programs by immigrants guided, above all, by a desire to keep their heads down and their families intact.

Secondarily, the chilling observed in the present study among Hispanic, non-white, and low-income immigrants matches analogous chilling documented by researchers such as, in the case of chilling among Hispanics, the Food Research & Action Center (2020) and Haley et al., (2021); of chilling among immigrants of color, Bernstein et al., (2019) and the National Immigration Law Center, (2019); and of chilling among low-income immigrant families, in particular, Manatt (2018) and the Urban Institute (2021), etc. As a result, the chilling measured here is in conversation with scholars such as Hirschi (2018)’s and Hester et. al (2018)’s claims that income-based inadmissibility policy has often functioned throughout the history of the United States as a veiled excuse to exclude “undesirable,” “non-white” immigrants.

These findings not only bolster claims made here and in the literature reviewed over the course of Chapter II that the expansion of the public charge rule disproportionately impacted immigrants of color and low-income immigrants (people already unduly vulnerable to the risk of poverty, hunger, and poor health outcomes), but they also support the idea that the 2019 rule functioned as a tool of social reproduction of structural barriers and inequities among immigrant communities. These barriers include under-enrollment in benefits programs among eligible immigrants; potential lesser achievement of English proficiency due to the avoidance of English-language education; and reactionary fears of immigration consequences so potent that immigrants turned away from public assistance, the nonprofit sector, and even their local public schools for support because of their panic about the Trump administration's plans and policies.

### **Recommendations**

The most important work to do about the state of inadmissibility policy today is to address Protect Immigrant Families' (2021) chief concern that the community they serve has not been made aware of the repeal of the 2019 rule. Significant chilling persists among immigrants irrespective of the Biden administration's expunging the expanded public charge statutes from the law. This chilling is potentially more harmful than ever before, as it now coincides with unprecedented personal health risks and public health consequences while we all weather the COVID-19 pandemic together. Especially because immigrants are particularly likely to be essential workers and thus instrumental to the labor force who have faced the highest levels of COVID-related risk, it is our moral obligation to ensure that this community has access to every benefit for which they are eligible.

Of course, even if COVID had never brought our world to a grinding halt in 2020, we should still fulfill our duty to protect the millions of children living with immigrant relatives who have suffered as a result of the 2019 rule, most of them U.S. citizens. These children share the birthright of all Americans to rely on our state-funded safety net if and when they need to do so. Community outreach about the restoration of the *1999 Field Guidance* of the kind that Renaud (2021) invoked in her interdepartmental letter to public sector colleagues is imperative.

Another practical recommendation is for ESL programs and the staff who operate them to do what Bleich and Fleischhacker (2019) recommended as the extent of chilling began to be revealed: “identify and disseminat[e] best practices for building and maintaining trust with those affected” (p. 508). Although these authors were primarily concerned with food access programs like ours at 18 Reasons, they still advised that all service providers “could help ensure those [immigrants] lawfully able to participate in federal... programs do” (p. 508). TESOL practitioners might also do well to heed this advice. Collective resource-sharing, communications plans, teacher training, and student outreach by our communities of practice may very well help adult ESL students resist chilling effects or come back to the English-language programs they have chosen to avoid.

Finally, the results of the present study, as well as the discoveries in the narrative content of Chapter II about the historical purpose and racist origins of past exclusion policies, and in addition to findings about chilling effects under the Clinton and Trump administrations and the measurable harm they visited on immigrant communities—particularly on citizen children from

low-income immigrant households and their families—it is incumbent on the author of this thesis to vehemently recommend against future expansions of the public charge test.

As this thesis is the project of one lone graduate student completed during free time leftover outside of full-time work and attending graduate school, the directions for potential future research by more experienced and better-resourced scholars are abundant. I encourage researchers in the education and policy fields to consider ESL programs as a “public benefit” offered to immigrant communities. Public education, including ESL for adults, should be considered alongside other programs as vital to immigrants’ ability to thrive, or else why is education compulsory and free for our children? Access to adult ESL is a basic need for many immigrant families whose members might enroll in curricula we call “survival English” or “basic skills English.” These kinds of programs can provide immigrant families with the language skills they need to interrupt processes of social reproduction that limit their human capital. This could interrupt the intergenerational effects of under-enrollment in benefits programs and other setbacks that come along with immigrant parents’ having limited English skills.

Next, I recommend that researchers pursue knowledge about *why* adult immigrants who were chilled from participation in ESL programs chose to avoid these classes. The present study explores correlations between milestones along the Trump administration’s journey to adopting the 2019 rule and corollary chilling effects among adult ESL students, but it cannot illuminate the *cause* of this chilling. Such causal research would likely take the form of an interview- or survey-based study of chilled and non-chilled ESL students.

Finally, more robust and sophisticated exploration of the expansive enrollment data set made available to the public via Cal-PASS Plus might reveal untold insights about adult ESL students in California and the programs that serve them. There is so much information available for free in this program. Further data from outside of the Cal-PASS Plus data set may also be helpful to future researchers. For example, the metric used here to approximate low-income status was Perkins loan eligibility, but eligibility for that program requires legal residence and the legal ability to apply for the Free Application for Federal Student Aid (FAFSA). Because of this, people concerned about their legal status, such as low-income undocumented immigrants, may not be captured as low-income in the enrollment records used here. Similarly, the Cal-PASS Plus data on credit versus non-credit ESL enrollment data in the *overall* enrollment data set did not match with enrollment numbers reported in the *ESL-specific* program data set (which, in theory, should be an exact drill-down of the former overall enrollment set). As a result of this inconsistency, credit versus non-credit ESL program type was not considered in this study's statistical analysis, but it would be interesting to learn about the prevalence of chilling effects on free, non-credit English classes versus paid, credit-eligible English classes if accurate data could be sourced.

### **Chapter IV Summary**

While overall enrollment in public ESL classes for adults throughout the state of California did not show significant chilling under the Trump administration, in the years 2016 (the year Donald Trump won the U.S. presidency) and 2018 (the year of the new public charge rule's announcement), significant chilling among Hispanic ESL students, ESL students of color, and low-income ESL students was present. These findings align with diverse scholarship about

chilling among immigrants in their use of other public programs, such as services offered by nonprofits and means-tested public benefits.

In response to the learnings I gleaned through preparing this thesis, I strongly recommend policymakers and anyone who has the power to influence legislation against future expansions of the public charge rule. In addition, I believe that it is imperative that the current administration plan, fund, and implement community outreach with the intent of regaining the public's trust, especially among members of the immigrant community, and of increasing program participation rates among people eligible for public benefits. Finally, I offer possible directions for future research about the cause of chilling among adult ESL students and further analysis of community college enrollment data sets and other data about ESL programs and their student populations, among many other insights that can be gained via analysis by researchers with more time, resources, and expertise.

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**Appendix A: List of California Community College Districts and Schools**

<b>District</b>	<b>Region</b>	<b>Counties Served</b>	<b>Colleges in District</b>	<b>Website</b>
Allan Hancock Joint Community College District (CCD)	South Central	San Luis Obispo Santa Barbara Ventura	Allan Hancock College	<a href="http://www.hancockcollege.edu">www.hancockcollege.edu</a>
Antelope Valley CCD	South Central	Kern Los Angeles	Antelope Valley College	<a href="http://www.avc.edu">www.avc.edu</a>
Barstow CCD	Inland Empire	San Bernardino	Barstow College	<a href="http://www.barstow.edu">www.barstow.edu</a>
Butte-Glenn CCD	Northern	Butte Glenn	Butte College	<a href="http://www.butte.edu">www.butte.edu</a>
Cabrillo CCD	Bay Area	Monterey San Benito Santa Cruz	Cabrillo College	<a href="http://www.cabrillo.edu">www.cabrillo.edu</a>
Cerritos CCD	Southern	Los Angeles	Cerritos College	<a href="http://www.cerritos.edu">www.cerritos.edu</a>
Chabot-Las Positas CCD	Bay Area	Alameda	Chabot College Las Positas College	<a href="http://www.clpccd.org">www.clpccd.org</a>
Chaffey CCD	Southern	San Bernardino	Chaffey College	<a href="http://www.chaffey.edu">www.chaffey.edu</a>
Citrus CCD	Southern	Los Angeles	Citrus College	<a href="http://www.citruscollege.edu">www.citruscollege.edu</a>
Coast CCD	Southern	Orange	Coastline Community College Golden West College Orange Coast College	<a href="http://www.cccd.edu">www.cccd.edu</a>
Compton CCD	Southern	Los Angeles	Compton College	<a href="http://district.compton.edu">district.compton.edu</a>
Contra Costa CCD	Bay Area	Contra Costa	Contra Costa College Diablo Valley College Los Medanos College	<a href="http://www.4cd.edu">www.4cd.edu</a>
Copper Mountain CCD	Southern	San Bernardino	Copper Mountain College	<a href="http://www.cmccd.edu">www.cmccd.edu</a>
Desert CCD	Southern	Riverside San Bernardino	College of the Desert	<a href="http://www.collegeofthedesert.edu">www.collegeofthedesert.edu</a>
El Camino CCD	Southern	Los Angeles	El Camino College	<a href="http://www.elcamino.edu">www.elcamino.edu</a>
Feather River CCD	Northern	Plumas	Feather River College	<a href="http://www.frc.edu">www.frc.edu</a>
Foothill-Deanza CCD	Bay Area	Santa Clara	De Anza College Foothill College	<a href="http://www.fhda.edu">www.fhda.edu</a>
Gavilan CCD	Central	San Benito Santa Clara	Gavilan College	<a href="http://www.gavilan.edu">www.gavilan.edu</a>
Glendale CCD	Southern	Los Angeles	Glendale Community College	<a href="http://www.glendale.edu">www.glendale.edu</a>
Grossmont-Cuyamaca CCD	Southern	San Diego	Cuyamaca College Grossmont College	<a href="http://www.gcccd.edu">www.gcccd.edu</a>
Hartnell CCD	Bay Area	Monterey San Benito	Hartnell College	<a href="http://www.hartnell.edu">www.hartnell.edu</a>
Imperial CCD	Southern	Imperial	Imperial Valley College	<a href="http://www.imperial.edu">www.imperial.edu</a>
Kern CCD	Central	Inyo Kern Mono San Bernardino Tulare	Bakersfield College Cerro Coso Community College Porterville College	<a href="http://www.kccd.edu">www.kccd.edu</a>
Lake Tahoe CCD	Central	El Dorado	Lake Tahoe Community College	<a href="http://www.ltcc.edu">www.ltcc.edu</a>
Lassen CCD	Northern	Lassen Modoc Mono Sierra	Lassen College	<a href="http://www.lassencollege.edu">www.lassencollege.edu</a>
Long Beach CCD	Southern	Los Angeles	Long Beach City College	<a href="http://www.lbcc.edu">www.lbcc.edu</a>
Los Angeles CCD	Southern	Los Angeles	East LA College LA City College LA Harbor College LA Mission College LA Pierce College LA Southwest College LA Trade-Tech College LA Valley College West LA College	<a href="http://www.laccd.edu">www.laccd.edu</a>
Los Rios CCD	Northern	El Dorado Placer Sacramento Yolo	American River College Consumnes River College Folsom Lake College Sacramento City College	<a href="http://www.losrios.edu">www.losrios.edu</a>
Marin CCD	Bay Area	Marin	College of Marin	<a href="http://www.marin.edu">www.marin.edu</a>

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<b>District</b>	<b>Region</b>	<b>Counties Served</b>	<b>Colleges in District</b>	<b>Website</b>
Mendocino-Lake CCD	Northern	Lake Mendocino	Mendocino College	<a href="http://www.mendocino.edu">www.mendocino.edu</a>
Merced CCD	Central	Fresno Merced	Merced College	<a href="http://www.mccd.edu">www.mccd.edu</a>
Mira Costa CCD	Southern	San Diego	MiraCosta College	<a href="http://www.miracosta.edu">www.miracosta.edu</a>
Monterey Peninsula CCD	Bay Area	Monterey	Monterey Peninsula College	<a href="http://www.mpc.edu">www.mpc.edu</a>
Mt. San Antonio CCD	Southern	Los Angeles	Mt. San Antonio College	<a href="http://www.mtsac.edu">www.mtsac.edu</a>
Mt. San Jacinto CCD	Southern	Riverside	Mt. San Jacinto College	<a href="http://www.msjc.edu">www.msjc.edu</a>
Napa Valley CCD	Northern	Napa Sonoma	Napa Valley College	<a href="http://www.napavalley.edu">www.napavalley.edu</a>
North Orange CCD	Southern	Los Angeles Orange	Cypress College Fullerton College	<a href="http://www.nocccd.edu">www.nocccd.edu</a>
Ohlone CCD	Bay Area	Alameda	Ohlone College	<a href="http://www.ohlone.edu">www.ohlone.edu</a>
Palo Verde CCD	Southern	Riverside San Bernardino	Palo Verde College	<a href="http://www.paloverde.edu">www.paloverde.edu</a>
Palomar CCD	Southern	San Diego	Palomar College	<a href="http://www.palomar.edu">www.palomar.edu</a>
Pasadena Area CCD	Southern	Los Angeles	Pasadena City College	<a href="http://www.pasadena.edu">www.pasadena.edu</a>
Peralta CCD	Bay Area	Alameda	College of Alameda Berkeley City College Laney College Merritt College	<a href="http://www.peralta.edu">www.peralta.edu</a>
Rancho Santiago CCD	Southern	Orange	Santa Ana College Santiago Canyon College	<a href="http://www.rscgd.edu">www.rscgd.edu</a>
Redwood CCD	Northern	Del Norte Humboldt Mendocino Trinity	College of the Redwoods	<a href="http://www.redwoods.edu">www.redwoods.edu</a>
Rio Hondo CCD	Southern	Los Angeles	Rio Hondo College	<a href="http://www.riohondo.edu">www.riohondo.edu</a>
Riverside CCD	Southern	Riverside	Moreno Valley College Norco College Riverside City College	<a href="https://www.rccd.edu">https://www.rccd.edu</a>
San Bernardino CCD	Southern	Riverside San Bernardino	Crafton Hills College San Bernardino Valley College	<a href="http://www.sbccd.cc.ca.us">www.sbccd.cc.ca.us</a>
San Diego CCD	Southern	San Diego	San Diego City College San Diego Mesa College San Diego Miramar College	<a href="http://www.sdccd.edu">www.sdccd.edu</a>
San Francisco CCD	Bay Area	San Francisco	City College of San Francisco	<a href="http://www.ccsf.edu">www.ccsf.edu</a>
San Joaquin Delta CCD	Central	San Joaquin Calaveras Sacramento Alameda Solano	San Joaquin Delta College	<a href="http://www.deltacollege.edu">www.deltacollege.edu</a>
San Jose-Evergreen CCD	Bay Area	Santa Clara	Evergreen Valley College San Jose City College	<a href="http://www.sjccd.edu">www.sjccd.edu</a>
San Luis Obispo County CCD	Southern	San Luis Obispo Monterey	Cuesta College	<a href="http://www.cuesta.edu">www.cuesta.edu</a>
San Mateo County CCD	Bay Area	San Mateo	Canada College College of San Mateo Skyline College	<a href="http://www.smccd.edu">www.smccd.edu</a>
Santa Barbara CCD	Southern	Santa Barbara	Santa Barbara City College	<a href="http://www.sbcc.edu">www.sbcc.edu</a>
Santa Clarita CCD	Southern	Los Angeles	College of the Canyons	<a href="http://www.canyons.edu">www.canyons.edu</a>
Santa Monica CCD	Southern	Los Angeles	Santa Monica College	<a href="http://www.smc.edu">www.smc.edu</a>
Sequoias CCD	Central	Kings Tulare	College of the Sequoias	<a href="http://www.cos.edu">www.cos.edu</a>
Shasta-Tehama-Trinity Joint CCD	Northern	Shasta Tehama Trinity Lassen Modoc Humboldt	Shasta College	<a href="http://www.shastacollege.edu">www.shastacollege.edu</a>

**Appendix A: List of California Community College Districts and Schools**

<b>District</b>	<b>Region</b>	<b>Counties Served</b>	<b>Colleges in District</b>	<b>Website</b>
Sierra Joint CCD	Northern	El Dorado Nevada Placer Sacramento	Sierra College	<a href="http://www.sierracollege.edu">www.sierracollege.edu</a>
Siskiyou Joint CCD	Northern	Siskiyou	College of the Siskiyous	<a href="http://www.siskiyous.edu">www.siskiyous.edu</a>
Solano County CCD	Northern	Solano Yolo	Solano Community College	<a href="http://www.solano.edu">www.solano.edu</a>
Sonoma County Junior College District	Northern	Sonoma Marin Mendocino	Santa Rosa Junior College	<a href="http://www.santarosa.edu">www.santarosa.edu</a>
Southern Orange County CCD	Southern	Orange	Irvine Valley College Saddleback College	<a href="http://www.socccd.edu">www.socccd.edu</a>
Southwestern CCD	Southern	San Diego	Southwestern College	<a href="http://www.swccd.edu">www.swccd.edu</a>
State Center CCD	Central	Fresno Madera Kings Tulare	Clovis Community College Fresno City College Madera College Reedley College	<a href="http://www.scccd.edu">www.scccd.edu</a>
Ventura County CCD	Southern	Ventura	Moorpark College Oxnard College Ventura College	<a href="http://www.vcccd.edu">www.vcccd.edu</a>
Victor Valley CCD	Southern	Los Angeles San Bernardino	Victor Valley College	<a href="http://www.vvc.edu">www.vvc.edu</a>
West Hills CCD	Central	Madera Kings Fresno San Benito Monterey	West Hills College Coalinga West Hills College Lemoore	<a href="http://www.westhillscollege.edu">www.westhillscollege.edu</a>
West Kern CCD	Southern	Kern	Taft College	<a href="http://www.taftcollege.edu">www.taftcollege.edu</a>
West Valley-Mission CCD	Bay Area	Santa Clara Santa Cruz	Mission College West Valley College	<a href="http://www.wvm.edu">www.wvm.edu</a>
Yosemite CCD	Central	Calaveras Merced Stanislaus Tuolumne San Joaquin Santa Clara	Columbia College Modesto Junior College	<a href="http://www.yosemite.edu">www.yosemite.edu</a>
Yuba CCD	Northern	Yuba Yolo Sutter Butte Colusa Glenn Lake Placer	Woodland Community College Yuba College	<a href="http://www.yccd.edu">www.yccd.edu</a>

**APPENDIX B: Timeline of the Development and Adoption of the 2019 Public Charge Rule**

Date	Action
<b>January 20, 2017</b>	President Donald Trump took office.
<b>January 23, 2017</b>	A draft Executive Order titled “Protecting Taxpayer Resources by Ensuring Our Immigration Laws Promote Accountability and Responsibility,” which would require the Department of State (DoS) and Department of Homeland Security (DHS) to establish new regulations for applying an expanded public charge test to immigrants seeking entry into the United States or adjustment of status, was leaked to media outlets.
<b>January 3, 2018</b>	The DoS published a revised consular office manual about visa issuance that included expanded benefits use (e.g., non-cash) in their public charge test.
<b>September 21, 2018</b>	The Secretary of the DHS announced his department’s forthcoming change in rulemaking, called Proposed Rule on Inadmissibility to the U.S., which would expand the public charge test to include use of non-cash and temporary benefits.
<b>October 10, 2018</b>	The DHS published their revised public charge statute in the Federal Register, opening a mandatory 60-day public comment period, after which the new public charge rule would be finalized.
<b>December 10, 2018</b>	The public comment period for the new public charge rule closed; more than 260,000 comments were submitted by the public, most in opposition to the new rule.
<b>August 14, 2019</b>	The DHS published updated inadmissibility statutes in the Federal Register with a planned effective date of 10/15/2019.
<b>October 15, 2019</b>	The date that the new public charge rule was supposed to be promulgated arrived, but the enforcement of the new rule was blocked by federal appeals court on 10/11/2019.
<b>January 27, 2020</b>	The U.S. Supreme Court overruled a temporary nationwide injunction blocking implementation of the rule, clearing the way for the enforcement of the new rule.
<b>February 24, 2020</b>	The new public charge rule was officially adopted.

*Adapted from the Immigrant Legal Resource Center (2021) and Barfosky, et al. (2020)*

Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
Allan Hancock	2015	ESL	3683	3103	580	3434	249	1509	2174
Antelope Valley	2015	ESL	556	257	299	500	56	521	35
Barstow	2015	ESL	105	49	56	80	25	55	50
Butte	2015	ESL	482	254	228	359	123	248	234
Cabrillo	2015	ESL	2592	1201	1391	1538	1054	1719	873
Cerritos	2015	ESL	2457	1772	685	2273	184	1395	1062
Chabot-Las Positas	2015	ESL	1123	408	715	901	222	1006	117
Chaffey	2015	ESL	1884	1220	664	1633	251	1417	467
Citrus	2015	ESL	2273	1423	850	1834	439	1953	320
Coast	2015	ESL	1344	249	1095	1092	252	895	449
Compton	2015	ESL	1496	816	680	1472	24	1192	304
Contra Costa	2015	ESL	1527	426	1101	1052	475	776	751
Copper Mountain	2015	ESL	333	116	217	196	137	39	294
Desert	2015	ESL	2695	2216	479	2478	217	606	2089
El Camino	2015	ESL	1946	987	959	1709	237	1502	444
Feather River	2015	ESL	189	166	23			23	166
Foothill-Deanza	2015	ESL	680	242	438	509	171	188	492
Gavilan	2015	ESL	1161	978	183	1066	95	363	798
Glendale	2015	ESL	5785	1087	4698	2244	3541	2774	3011
Grossmont-Cuyamaca	2015	ESL	564	126	438	243	321	342	222
Hartnell	2015	ESL	826	699	127	766	60	508	318
Imperial	2015	ESL	1199	1084	115	1181	18	992	207
Kern	2015	ESL	2253	1541	712	1880	373	1847	406
Lake Tahoe	2015	ESL	670	287	383	348	322	325	345
Lassen	2015	ESL	620	364	256	497	123	176	444
Long Beach	2015	ESL	2269	1455	814	2140	129	975	1294
Los Angeles	2015	ESL	26491	18178	8313	24115	2376	11386	15105
Los Rios	2015	ESL	5109	1377	3732	3628	1481	4553	556
Marin	2015	ESL	2615	1319	1296	2095	520	412	2203
Mendocino-Lake	2015	ESL	1018	540	478	676	342	572	446
Merced	2015	ESL	913	604	309	770	143	579	334
Mira Costa	2015	ESL	2733	1743	990	2205	528	547	2186
Monterey	2015	ESL	1064	382	682	643	421	353	711
Mt. San Antonio	2015	ESL	11230	5101	6129	10444	786	2999	8231
Mt. San Jacinto	2015	ESL	1704	410	1294	1614	90	154	1550
Napa Valley	2015	ESL	725	262	463	509	216	238	487
North Orange	2015	ESL	14240	7185	7055	12966	1274	2992	11248
Ohlone	2015	ESL	556	74	482	460	96	163	393
Palo Verde	2015	ESL	714	544	170	625	89	257	457
Palomar	2015	ESL	4236	2945	1291	3665	571	1105	3131
Pasadena	2015	ESL	4539	2057	2482	4273	266	1110	3429
Peralta	2015	ESL	2523	596	1927	2266	257	1712	811
Rancho Santiago	2015	ESL	29514	20959	8555	26484	3030	6316	23198
Redwoods	2015	ESL	696	339	357	471	225	244	452
Rio Hondo	2015	ESL	460	406	54			21	439
Riverside	2015	ESL	471	266	205	364	107	292	179
San Bernardino	2015	ESL	421	208	213	283	138	244	177
San Diego	2015	ESL	18018	8973	9045	15884	2134	5466	12552
San Francisco	2015	ESL	31204	9861	21343	28754	2450	10535	20669

Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
San Joaquin Delta	2015	ESL	1385	606	779	1121	264	1213	172
San Jose-Evergreen	2015	ESL	1223	367	856	1101	122	820	403
San Luis Obispo	2015	ESL	755	513	242	618	137	279	476
San Mateo	2015	ESL	2329	1144	1185	1897	432	1497	832
Santa Barbara	2015	ESL	4249	3232	1017	3899	350	912	3337
Santa Clarita	2015	ESL	2449	1383	1066	1811	638	1010	1439
Santa Monica	2015	ESL	3525	1709	1816	2814	711	2057	1468
Sequoias	2015	ESL	567	412	155	550	17	72	495
Shasta-Tehama-Trinity	2015	ESL	1395	348	1047	640	755	748	647
Sierra	2015	ESL	954	286	668	414	540	633	321
Siskiyou	2015	ESL	2029	1158	871	1545	484	763	1266
Solano	2015	ESL	480	135	345	383	97	404	76
Sonoma	2015	ESL	5224	3482	1742	4157	1067	1511	3713
South Orange	2015	ESL	2723	485	2238	1374	1349	769	1954
Southwestern	2015	ESL	1504	782	722	1115	389	1261	243
State Center	2015	ESL	2393	1356	1037	1857	536	1983	410
Ventura	2015	ESL	688	351	337	449	239	397	291
Victor Valley	2015	ESL	891	473	418	732	159	520	371
West Hills	2015	ESL	1442	921	521	1164	278	1129	313
West Kern	2015	ESL	308	210	98	249	59	175	133
West Valley-Mission	2015	ESL	1676	314	1362	1290	386	691	985
Yosemite	2015	ESL	1235	767	468	987	248	386	849
Yuba	2015	ESL	700	356	344	551	149	317	383
Allan Hancock	2015	Non-ESL	20775	10280	10495	12825	7950	15524	5251
Antelope Valley	2015	Non-ESL	17869	8096	9773	13701	4168	15751	2118
Barstow	2015	Non-ESL	5144	1920	3224	3475	1669	4196	948
Butte	2015	Non-ESL	16440	3078	13362	6094	10346	13597	2843
Cabrillo	2015	Non-ESL	15401	5383	10018	7294	8107	9353	6048
Cerritos	2015	Non-ESL	30085	19259	10826	26748	3337	23790	6295
Chabot-Las Positas	2015	Non-ESL	27477	9140	18337	19881	7596	24377	3100
Chaffey	2015	Non-ESL	23992	14429	9563	19640	4352	20166	3826
Citrus	2015	Non-ESL	17055	10246	6809	13853	3202	14564	2491
Coast	2015	Non-ESL	64909	19505	45404	42916	21993	43013	21896
Compton	2015	Non-ESL	10243	5265	4978	9825	418	8857	1386
Contra Costa	2015	Non-ESL	45976	13103	32873	31392	14584	28696	17280
Copper Mountain	2015	Non-ESL	2365	634	1731	1047	1318	1914	451
Desert	2015	Non-ESL	11661	7769	3892	9090	2571	9479	2182
El Camino	2015	Non-ESL	29721	14395	15326	25521	4200	23399	6322
Feather River	2015	Non-ESL	2946	761	2185			1865	1081
Foothill-Deanza	2015	Non-ESL	59182	14451	44731	42847	16335	26260	32922
Gavilan	2015	Non-ESL	8492	4469	4023	5679	2813	4724	3768
Glendale	2015	Non-ESL	21243	6961	14282	11708	9535	15133	6110
Grossmont-Cuyamaca	2015	Non-ESL	31979	10462	21517	18268	13711	26091	5888
Hartnell	2015	Non-ESL	15217	8810	6407	11798	3419	8860	6357
Imperial	2015	Non-ESL	8867	7942	925	8645	222	7875	992
Kern	2015	Non-ESL	34587	20894	13693	25388	9199	25692	8895
Lake Tahoe	2015	Non-ESL	5497	1113	4384	2033	3464	2822	2675
Lassen	2015	Non-ESL	4588	1123	3465	2555	2033	3325	1263
Long Beach	2015	Non-ESL	31410	16774	14636	26639	4771	24712	6698

Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
Los Angeles	2015	Non-ESL	174568	93931	80637	146439	28129	133303	41265
Los Rios	2015	Non-ESL	90471	20744	69727	55453	35018	69838	20633
Marin	2015	Non-ESL	6698	1626	5072	3142	3556	3822	2876
Mendocino-Lake	2015	Non-ESL	4690	1068	3622	1759	2931	3362	1328
Merced	2015	Non-ESL	13900	7560	6340	10285	3615	11207	2693
Mira Costa	2015	Non-ESL	22296	7072	15224	11645	10651	11534	10762
Monterey	2015	Non-ESL	13535	4244	9291	7149	6386	6341	7194
Mt. San Antonio	2015	Non-ESL	49718	28074	21644	44099	5619	27572	22146
Mt. San Jacinto	2015	Non-ESL	19638	8606	11032	13076	6562	15896	3742
Napa Valley	2015	Non-ESL	9042	3207	5835	5959	3083	5681	3361
North Orange	2015	Non-ESL	66298	27303	38995	50714	15584	42425	23873
Ohlone	2015	Non-ESL	15483	3283	12200	11463	4020	6389	9094
Palo Verde	2015	Non-ESL	5542	1802	3740	3283	2259	3136	2406
Palomar	2015	Non-ESL	32665	12219	20446	18748	13917	19884	12781
Pasadena	2015	Non-ESL	36800	16842	19958	33078	3722	24985	11815
Peralta	2015	Non-ESL	36066	7837	28229	28769	7297	25977	10089
Rancho Santiago	2015	Non-ESL	64111	30822	33289	47156	16955	32694	31417
Redwoods	2015	Non-ESL	6173	1005	5168	2445	3728	4810	1363
Rio Hondo	2015	Non-ESL	29840	19921	9919			18985	10855
Riverside	2015	Non-ESL	44298	24816	19482	34730	9568	34466	9832
San Bernardino	2015	Non-ESL	23926	13766	10160	18708	5218	19294	4632
San Diego	2015	Non-ESL	88146	28317	59829	56218	31928	56392	31754
San Francisco	2015	Non-ESL	39385	8480	30905	29194	10191	24143	15242
San Joaquin Delta	2015	Non-ESL	23082	9785	13297	17611	5471	19290	3792
San Jose-Evergreen	2015	Non-ESL	22236	9144	13092	19214	3022	15507	6729
San Luis Obispo	2015	Non-ESL	12034	3411	8623	4840	7194	8285	3749
San Mateo	2015	Non-ESL	30432	9928	20504	22508	7924	18073	12359
Santa Barbara	2015	Non-ESL	25429	8221	17208	14701	10728	14684	10745
Santa Clarita	2015	Non-ESL	27391	11847	15544	17031	10360	14374	13017
Santa Monica	2015	Non-ESL	42927	14163	28764	28922	14005	24501	18426
Sequoias	2015	Non-ESL	13398	8268	5130	9905	3493	11312	2086
Shasta-Tehama-Trinity	2015	Non-ESL	10665	1459	9206	3180	7485	7244	3421
Sierra	2015	Non-ESL	24202	6201	18001	9950	14252	15650	8552
Siskiyou	2015	Non-ESL	3354	414	2940	1426	1928	1404	1950
Solano	2015	Non-ESL	13438	3377	10061	9152	4286	9909	3529
Sonoma	2015	Non-ESL	32580	8484	24096	13914	18666	18298	14282
South Orange	2015	Non-ESL	49515	10821	38694	23862	25653	22292	27223
Southwestern	2015	Non-ESL	25465	12203	13262	18301	7164	22932	2533
State Center	2015	Non-ESL	45539	23916	21623	33916	11623	34883	10656
Ventura	2015	Non-ESL	40773	19629	21144	25976	14797	26733	14040
Victor Valley	2015	Non-ESL	15560	7216	8344	10757	4803	12772	2788
West Hills	2015	Non-ESL	7181	3965	3216	5380	1801	5373	1808
West Kern	2015	Non-ESL	9642	5308	4334	6562	3080	5668	3974
West Valley-Mission	2015	Non-ESL	26019	5779	20240	17789	8230	12348	13671
Yosemite	2015	Non-ESL	26524	10579	15945	14763	11761	21369	5155
Yuba	2015	Non-ESL	11869	4088	7781	7193	4676	9716	2153
Allan Hancock	2016	ESL	4100	3555	545	3898	202	1448	2652
Antelope Valley	2016	ESL	940	542	398	844	96	629	311
Barstow	2016	ESL	89	51	38	71	18	41	48

Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
Butte	2016	ESL	633	288	345	407	226	259	374
Cabrillo	2016	ESL	2526	1230	1296	1536	990	1770	756
Cerritos	2016	ESL	2317	1734	583	2239	78	1301	1016
Chabot-Las Positas	2016	ESL	1192	445	747	962	230	1049	143
Chaffey	2016	ESL	1653	1082	571	1441	212	1175	478
Citrus	2016	ESL	2427	1557	870	2016	411	2039	388
Coast	2016	ESL	1449	311	1138	1214	235	928	521
Compton	2016	ESL	1297	760	537	1276	21	1062	235
Contra Costa	2016	ESL	1721	528	1193	1190	531	699	1022
Copper Mountain	2016	ESL	395	140	255	222	173	62	333
Desert	2016	ESL	3316	2718	598	3098	218	729	2587
El Camino	2016	ESL	1796	929	867	1582	214	1413	383
Feather River	2016	ESL	81	62	19	67	14	19	62
Foothill-Deanza	2016	ESL	701	238	463	508	193	199	502
Gavilan	2016	ESL	1188	985	203	1075	113	359	829
Glendale	2016	ESL	6145	1129	5016	2466	3679	3463	2682
Grossmont-Cuyamaca	2016	ESL	386	102	284	193	193	209	177
Hartnell	2016	ESL	700	598	102	655	45	435	265
Imperial	2016	ESL	1334	1227	107	1293	41	997	337
Kern	2016	ESL	2418	1664	754	2004	414	1897	521
Lake Tahoe	2016	ESL	634	218	416	284	350	233	401
Lassen	2016	ESL	577	348	229	429	148	136	441
Long Beach	2016	ESL	2264	1617	647	2148	116	734	1530
Los Angeles	2016	ESL	27526	18749	8777	25043	2483	11115	16411
Los Rios	2016	ESL	5262	1535	3727	3823	1439	4658	604
Marin	2016	ESL	2432	1158	1274	1855	577	377	2055
Mendocino-Lake	2016	ESL	1071	584	487	723	348	589	482
Merced	2016	ESL	909	633	276	769	140	540	369
Mira Costa	2016	ESL	2765	1751	1014	2242	523	440	2325
Monterey	2016	ESL	1160	423	737	687	473	387	773
Mt. San Antonio	2016	ESL	22691	11995	10696	21552	1139	3073	19618
Mt. San Jacinto	2016	ESL	2479	543	1936	2410	69	171	2308
Napa Valley	2016	ESL	729	263	466	488	241	220	509
North Orange	2016	ESL	13430	6939	6491	12257	1173	2961	10469
Ohlone	2016	ESL	341	54	287	276	65	135	206
Palo Verde	2016	ESL	792	621	171	707	85	274	518
Palomar	2016	ESL	4792	3299	1493	4045	747	1348	3444
Pasadena	2016	ESL	4704	2233	2471	4414	290	1156	3548
Peralta	2016	ESL	2418	541	1877	2053	365	1612	806
Rancho Santiago	2016	ESL	24811	13686	11125	22557	2254	5817	18994
Redwoods	2016	ESL	652	289	363	426	226	229	423
Rio Hondo	2016	ESL	494	368	126	483	11	74	420
Riverside	2016	ESL	309	128	181	227	82	120	189
San Bernardino	2016	ESL	359	181	178	246	113	214	145
San Diego	2016	ESL	17969	8671	9298	15651	2318	5196	12773
San Francisco	2016	ESL	28657	9281	19376	26369	2288	9330	19327
San Joaquin Delta	2016	ESL	1278	586	692	1058	220	1073	205
San Jose-Evergreen	2016	ESL	1143	392	751	1012	131	710	433
San Luis Obispo	2016	ESL	1306	869	437	1002	304	450	856



Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
San Mateo	2016	ESL	2167	1039	1128	1744	423	1344	823
Santa Barbara	2016	ESL	1580	418	1162	1462	118	564	1016
Santa Clarita	2016	ESL	1873	1079	794	1434	439	501	1372
Santa Monica	2016	ESL	3348	1632	1716	2642	706	1905	1443
Sequoias	2016	ESL	692	498	194	656	36	111	581
Shasta-Tehama-Trinity	2016	ESL	1441	359	1082	673	768	691	750
Sierra	2016	ESL	863	282	581	414	449	596	267
Siskiyou	2016	ESL	1916	1194	722	1483	433	638	1278
Solano	2016	ESL	371	109	262	293	78	311	60
Sonoma	2016	ESL	5910	3900	2010	4692	1218	2073	3837
South Orange	2016	ESL	3828	963	2865	2273	1555	1023	2805
Southwestern	2016	ESL	712	437	275	605	107	455	257
State Center	2016	ESL	2347	1456	891	1912	435	1976	371
Ventura	2016	ESL	667	326	341	419	248	359	308
Victor Valley	2016	ESL	989	522	467	810	179	572	417
West Hills	2016	ESL	655	416	239	518	137	416	239
West Kern	2016	ESL	308	215	93	251	57	168	140
West Valley-Mission	2016	ESL	1568	361	1207	1222	346	650	918
Yosemite	2016	ESL	1390	806	584	1043	347	489	901
Yuba	2016	ESL	795	369	426	625	170	367	428
Allan Hancock	2016	Non-ESL	19944	9821	10123	12245	7699	14883	5061
Antelope Valley	2016	Non-ESL	17465	8455	9010	13525	3940	15383	2082
Barstow	2016	Non-ESL	4796	1937	2859	3270	1526	3876	920
Butte	2016	Non-ESL	15979	3460	12519	6290	9689	13053	2926
Cabrillo	2016	Non-ESL	14833	5456	9377	7308	7525	8918	5915
Cerritos	2016	Non-ESL	30003	20105	9898	28024	1979	23460	6543
Chabot-Las Positas	2016	Non-ESL	28771	9741	19030	21175	7596	25553	3218
Chaffey	2016	Non-ESL	26261	16343	9918	21839	4422	21929	4332
Citrus	2016	Non-ESL	17968	10966	7002	14847	3121	15129	2839
Coast	2016	Non-ESL	66098	20126	45972	44158	21940	44595	21503
Compton	2016	Non-ESL	9786	5357	4429	9383	403	8670	1116
Contra Costa	2016	Non-ESL	47172	14163	33009	32753	14419	29335	17837
Copper Mountain	2016	Non-ESL	2511	735	1776	1238	1273	2017	494
Desert	2016	Non-ESL	12463	8400	4063	9776	2687	10082	2381
El Camino	2016	Non-ESL	29222	14738	14484	25290	3932	23609	5613
Feather River	2016	Non-ESL	3257	912	2345	1706	1551	2051	1206
Foothill-Deanza	2016	Non-ESL	58945	14635	44310	42760	16185	26505	32440
Gavilan	2016	Non-ESL	10591	5181	5410	6768	3823	5249	5342
Glendale	2016	Non-ESL	21792	7231	14561	12047	9745	15709	6083
Grossmont-Cuyamaca	2016	Non-ESL	31822	10562	21260	18103	13719	25875	5947
Hartnell	2016	Non-ESL	16095	9230	6865	12219	3876	9127	6968
Imperial	2016	Non-ESL	9003	8132	871	8660	343	7981	1022
Kern	2016	Non-ESL	35879	22181	13698	26714	9165	26027	9852
Lake Tahoe	2016	Non-ESL	5468	1210	4258	2200	3268	2902	2566
Lassen	2016	Non-ESL	4118	1040	3078	2307	1811	2986	1132
Long Beach	2016	Non-ESL	31676	17592	14084	27108	4568	24581	7095
Los Angeles	2016	Non-ESL	176506	96622	79884	148253	28253	134879	41627
Los Rios	2016	Non-ESL	93111	21940	71171	58356	34755	70414	22697
Marin	2016	Non-ESL	6475	1690	4785	3088	3387	3474	3001

Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
Mendocino-Lake	2016	Non-ESL	4726	1165	3561	1811	2915	3346	1380
Merced	2016	Non-ESL	14484	8099	6385	10884	3600	11531	2953
Mira Costa	2016	Non-ESL	22645	7601	15044	12203	10442	12158	10487
Monterey	2016	Non-ESL	12579	4240	8339	7085	5494	6213	6366
Mt. San Antonio	2016	Non-ESL	39946	22093	17853	35074	4872	27796	12150
Mt. San Jacinto	2016	Non-ESL	20519	9381	11138	13934	6585	16511	4008
Napa Valley	2016	Non-ESL	8929	3305	5624	5964	2965	5523	3406
North Orange	2016	Non-ESL	66206	28162	38044	51328	14878	42533	23673
Ohlone	2016	Non-ESL	14889	3238	11651	11605	3284	6358	8531
Palo Verde	2016	Non-ESL	6858	2178	4680	3879	2979	3823	3035
Palomar	2016	Non-ESL	30994	12206	18788	18365	12629	19331	11663
Pasadena	2016	Non-ESL	36738	17242	19496	31235	5503	25282	11456
Peralta	2016	Non-ESL	35374	7983	27391	28508	6866	26410	8964
Rancho Santiago	2016	Non-ESL	67535	30110	37425	52212	15323	32365	35170
Redwoods	2016	Non-ESL	6701	1178	5523	2711	3990	4840	1861
Rio Hondo	2016	Non-ESL	29164	20136	9028	26018	3146	19031	10133
Riverside	2016	Non-ESL	46055	26735	19320	36306	9749	35627	10428
San Bernardino	2016	Non-ESL	24167	14141	10026	19001	5166	19549	4618
San Diego	2016	Non-ESL	88762	29187	59575	56840	31922	56131	32631
San Francisco	2016	Non-ESL	37131	8533	28598	27757	9374	22974	14157
San Joaquin Delta	2016	Non-ESL	23123	10147	12976	17701	5422	19235	3888
San Jose-Evergreen	2016	Non-ESL	21733	9194	12539	19051	2682	15116	6617
San Luis Obispo	2016	Non-ESL	11574	3150	8424	4572	7002	8251	3323
San Mateo	2016	Non-ESL	28981	9611	19370	21721	7260	16636	12345
Santa Barbara	2016	Non-ESL	22675	7694	14981	13474	9201	16732	5943
Santa Clarita	2016	Non-ESL	27834	12803	15031	17860	9974	15366	12468
Santa Monica	2016	Non-ESL	43168	14567	28601	29003	14165	24805	18363
Sequoias	2016	Non-ESL	13810	8780	5030	10430	3380	11612	2198
Shasta-Tehama-Trinity	2016	Non-ESL	10889	1588	9301	3363	7526	7076	3813
Sierra	2016	Non-ESL	24126	6237	17889	10107	14019	15299	8827
Siskiyou	2016	Non-ESL	3385	466	2919	1504	1881	1403	1982
Solano	2016	Non-ESL	13192	3564	9628	9150	4042	9931	3261
Sonoma	2016	Non-ESL	32607	8530	24077	14496	18111	17675	14932
South Orange	2016	Non-ESL	49237	10823	38414	23861	25376	22783	26454
Southwestern	2016	Non-ESL	26102	16648	9454	22785	3317	22184	3918
State Center	2016	Non-ESL	44920	24442	20478	33964	10956	35197	9723
Ventura	2016	Non-ESL	41332	20286	21046	26394	14938	27236	14096
Victor Valley	2016	Non-ESL	15574	7642	7932	11086	4488	12856	2718
West Hills	2016	Non-ESL	8382	4946	3436	6407	1975	6252	2130
West Kern	2016	Non-ESL	8981	5025	3956	6308	2673	5274	3707
West Valley-Mission	2016	Non-ESL	26648	6152	20496	18816	7832	12321	14327
Yosemite	2016	Non-ESL	26698	11271	15427	15073	11625	22961	3737
Yuba	2016	Non-ESL	12478	4568	7910	7773	4705	10010	2468
Allan Hancock	2017	ESL	4101	3530	571	3766	335	1485	2616
Antelope Valley	2017	ESL	640	425	215	577	63	285	355
Barstow	2017	ESL	39	21	18			20	19
Butte	2017	ESL	642	285	357	389	253	264	378
Cabrillo	2017	ESL	2483	1244	1239	1525	958	1694	789
Cerritos	2017	ESL	2457	1910	547	2407	50	1349	1108

Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
Chabot-Las Positas	2017	ESL	1325	489	836	1067	258	1137	188
Chaffey	2017	ESL	1696	1044	652	1454	242	1213	483
Citrus	2017	ESL	2048	1239	809	1702	346	1609	439
Coast	2017	ESL	2153	420	1733	1613	540	1168	985
Compton	2017	ESL	1234	750	484	1218	16	1022	212
Contra Costa	2017	ESL	1378	418	960	950	428	593	785
Copper Mountain	2017	ESL	364	132	232	222	142	62	302
Desert	2017	ESL	3556	2898	658	3309	247	874	2682
El Camino	2017	ESL	2039	1067	972	1793	246	1531	508
Feather River	2017	ESL	18						
Foothill-Deanza	2017	ESL	694	212	482	518	176	167	527
Gavilan	2017	ESL	1461	1252	209	1341	120	380	1081
Glendale	2017	ESL	6656	1154	5502	2540	4116	2774	3882
Grossmont-Cuyamaca	2017	ESL	456	129	327	246	210	218	238
Hartnell	2017	ESL	532	459	73	497	35	353	179
Imperial	2017	ESL	1476	1377	99	1433	43	1029	447
Kern	2017	ESL	2557	1785	772	2148	409	2015	542
Lake Tahoe	2017	ESL	550	176	374	225	325	156	394
Lassen	2017	ESL	248	103	145	156	92	93	155
Long Beach	2017	ESL	2260	1574	686	2140	120	632	1628
Los Angeles	2017	ESL	28081	19382	8699	25580	2501	10005	18076
Los Rios	2017	ESL	5040	1523	3517	3595	1445	4417	623
Marin	2017	ESL	2605	1233	1372	2015	590	353	2252
Mendocino-Lake	2017	ESL	815	478	337	573	242	347	468
Merced	2017	ESL	1204	879	325	1073	131	638	566
Mira Costa	2017	ESL	3182	2002	1180	2617	565	496	2686
Monterey	2017	ESL	1117	422	695	675	442	336	781
Mt. San Antonio	2017	ESL	24972	12311	12661	23647	1325	3352	21620
Mt. San Jacinto	2017	ESL	2352	382	1970	2280	72	143	2209
Napa Valley	2017	ESL	648	240	408	453	195	212	436
North Orange	2017	ESL	12360	6357	6003	11245	1115	2736	9624
Ohlone	2017	ESL	430	77	353	351	79	163	267
Palo Verde	2017	ESL	877	698	179	778	99	302	575
Palomar	2017	ESL	5425	3315	2110	4482	943	1648	3777
Pasadena	2017	ESL	5218	2231	2987	4805	413	1392	3826
Peralta	2017	ESL	1853	419	1434	1612	241	1421	432
Rancho Santiago	2017	ESL	22851	9650	13201	21265	1586	5510	17341
Redwoods	2017	ESL	674	234	440	388	286	282	392
Rio Hondo	2017	ESL	836	666	170	755	81	296	540
Riverside	2017	ESL	310	148	162	237	73	151	159
San Bernardino	2017	ESL	620	333	287	455	165	433	187
San Diego	2017	ESL	17105	8267	8838	14911	2194	4881	12224
San Francisco	2017	ESL	26831	8823	18008	24647	2184	7130	19701
San Joaquin Delta	2017	ESL	1260	574	686	1022	238	1033	227
San Jose-Evergreen	2017	ESL	1066	314	752	951	115	667	399
San Luis Obispo	2017	ESL	1233	868	365	992	241	437	796
San Mateo	2017	ESL	1972	936	1036	1567	405	1129	843
Santa Barbara	2017	ESL	1485	366	1119	1369	116	545	940
Santa Clarita	2017	ESL	1496	842	654	1166	330	391	1105

Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
Santa Monica	2017	ESL	3017	1379	1638	2368	649	1723	1294
Sequoias	2017	ESL	794	547	247	761	33	122	672
Shasta-Tehama-Trinity	2017	ESL	1334	361	973	655	679	652	682
Sierra	2017	ESL	856	313	543	470	386	563	293
Siskiyou	2017	ESL	2855	2188	667	2423	432	621	2234
Solano	2017	ESL	396	101	295	284	112	273	123
Sonoma	2017	ESL	5937	3858	2079	4753	1184	2299	3638
South Orange	2017	ESL	5312	1670	3642	3353	1959	989	4323
Southwestern	2017	ESL	706	407	299	633	73	429	277
State Center	2017	ESL	2384	1493	891	1935	449	1909	475
Ventura	2017	ESL	724	353	371	488	236	365	359
Victor Valley	2017	ESL	1585	968	617	1324	261	1132	453
West Hills	2017	ESL	588	414	174	492	96	388	200
West Kern	2017	ESL	184	88	96	124	60	137	47
West Valley-Mission	2017	ESL	1607	312	1295	1226	381	576	1031
Yosemite	2017	ESL	1660	954	706	1258	402	519	1141
Yuba	2017	ESL	854	437	417	666	188	409	445
Allan Hancock	2017	Non-ESL	17474	9072	8402	11208	6266	13625	3849
Antelope Valley	2017	Non-ESL	17320	8795	8525	13593	3727	15237	2083
Barstow	2017	Non-ESL	5051	1787	3264			4110	941
Butte	2017	Non-ESL	15354	3745	11609	6474	8880	12334	3020
Cabrillo	2017	Non-ESL	14532	5409	9123	7288	7244	8550	5982
Cerritos	2017	Non-ESL	29731	20180	9551	28178	1553	22555	7176
Chabot-Las Positas	2017	Non-ESL	28931	9960	18971	21558	7373	25745	3186
Chaffey	2017	Non-ESL	27206	17218	9988	22939	4267	22223	4983
Citrus	2017	Non-ESL	18121	10988	7133	15108	3013	15187	2934
Coast	2017	Non-ESL	63646	19875	43771	42757	20889	42721	20925
Compton	2017	Non-ESL	10040	5703	4337	9635	405	8804	1236
Contra Costa	2017	Non-ESL	46013	14270	31743	32403	13610	28292	17721
Copper Mountain	2017	Non-ESL	2474	771	1703	1251	1223	1976	498
Desert	2017	Non-ESL	12560	8688	3872	10011	2549	10461	2099
El Camino	2017	Non-ESL	29892	15330	14562	25947	3945	23800	6092
Feather River	2017	Non-ESL	2666						
Foothill-Deanza	2017	Non-ESL	59951	15195	44756	43505	16446	26097	33854
Gavilan	2017	Non-ESL	7818	4379	3439	5441	2377	4530	3288
Glendale	2017	Non-ESL	20836	7034	13802	11451	9385	14994	5842
Grossmont-Cuyamaca	2017	Non-ESL	32147	10893	21254	18556	13591	25975	6172
Hartnell	2017	Non-ESL	16077	9798	6279	12267	3810	9646	6431
Imperial	2017	Non-ESL	9123	8166	957	8706	417	8131	992
Kern	2017	Non-ESL	36505	22369	14136	27471	9034	27718	8787
Lake Tahoe	2017	Non-ESL	4897	1131	3766	2063	2834	2575	2322
Lassen	2017	Non-ESL	3877	1142	2735	2283	1594	2955	922
Long Beach	2017	Non-ESL	32440	18604	13836	27878	4562	25096	7344
Los Angeles	2017	Non-ESL	174830	97117	77713	147795	27035	132605	42225
Los Rios	2017	Non-ESL	90946	22610	68336	58027	32919	68526	22420
Marin	2017	Non-ESL	6293	1794	4499	3033	3260	3308	2985
Mendocino-Lake	2017	Non-ESL	4988	1364	3624	2076	2912	3496	1492
Merced	2017	Non-ESL	14801	8381	6420	11133	3668	11644	3157
Mira Costa	2017	Non-ESL	22037	7475	14562	12047	9990	12034	10003

Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
Monterey	2017	Non-ESL	14059	4709	9350	8471	5588	6358	7701
Mt. San Antonio	2017	Non-ESL	40269	22383	17886	35614	4655	27800	12469
Mt. San Jacinto	2017	Non-ESL	20990	10043	10947	14676	6314	16467	4523
Napa Valley	2017	Non-ESL	8733	3304	5429	5966	2767	5302	3431
North Orange	2017	Non-ESL	65907	28070	37837	51769	14138	41475	24432
Ohlone	2017	Non-ESL	14563	3267	11296	11389	3174	6314	8249
Palo Verde	2017	Non-ESL	6118	2193	3925	3638	2480	3942	2176
Palomar	2017	Non-ESL	31137	12763	18374	18919	12218	19498	11639
Pasadena	2017	Non-ESL	37530	17998	19532	31614	5916	25891	11639
Peralta	2017	Non-ESL	31985	6766	25219	25711	6274	25208	6777
Rancho Santiago	2017	Non-ESL	68503	29714	38789	54701	13802	32350	36153
Redwoods	2017	Non-ESL	6673	1282	5391	2807	3866	4856	1817
Rio Hondo	2017	Non-ESL	28803	20465	8338	25806	2997	18721	10082
Riverside	2017	Non-ESL	48357	28722	19635	38259	10098	36984	11373
San Bernardino	2017	Non-ESL	24677	14607	10070	19667	5010	19908	4769
San Diego	2017	Non-ESL	88891	30090	58801	57475	31416	57043	31848
San Francisco	2017	Non-ESL	35421	8518	26903	26761	8660	21984	13437
San Joaquin Delta	2017	Non-ESL	22710	10020	12690	17618	5092	18684	4026
San Jose-Evergreen	2017	Non-ESL	21626	9260	12366	19016	2610	14478	7148
San Luis Obispo	2017	Non-ESL	11589	3146	8443	4608	6981	7791	3798
San Mateo	2017	Non-ESL	27965	9334	18631	21182	6783	15695	12270
Santa Barbara	2017	Non-ESL	21468	7338	14130	12798	8670	16138	5330
Santa Clarita	2017	Non-ESL	29223	13296	15927	19277	9946	16254	12969
Santa Monica	2017	Non-ESL	43056	15029	28027	29009	14047	25712	17344
Sequoias	2017	Non-ESL	14124	9246	4878	10810	3314	11822	2302
Shasta-Tehama-Trinity	2017	Non-ESL	10876	1687	9189	3488	7388	7139	3737
Sierra	2017	Non-ESL	23430	6026	17404	9994	13436	14594	8836
Siskiyou	2017	Non-ESL	3402	500	2902	1442	1960	1433	1969
Solano	2017	Non-ESL	12601	3587	9014	8881	3720	9406	3195
Sonoma	2017	Non-ESL	31033	8434	22599	14944	16089	16541	14492
South Orange	2017	Non-ESL	51270	11425	39845	25306	25964	23582	27688
Southwestern	2017	Non-ESL	26033	17030	9003	23222	2811	22676	3357
State Center	2017	Non-ESL	47832	26391	21441	35878	11954	36021	11811
Ventura	2017	Non-ESL	41299	20666	20633	26826	14473	27028	14271
Victor Valley	2017	Non-ESL	14988	7631	7357	10722	4266	12294	2694
West Hills	2017	Non-ESL	9159	5588	3571	7123	2036	6773	2386
West Kern	2017	Non-ESL	11850	6611	5239	8154	3696	6519	5331
West Valley-Mission	2017	Non-ESL	24272	5730	18542	17143	7129	11019	13253
Yosemite	2017	Non-ESL	27099	11949	15150	15558	11541	23317	3782
Yuba	2017	Non-ESL	12565	4893	7672	8041	4524	9742	2823
Allan Hancock	2018	ESL	4323	3715	608	3927	396	1429	2894
Antelope Valley	2018	ESL	613	389	224	557	56	260	353
Barstow	2018	ESL	36	22	14	26	10	17	19
Butte	2018	ESL	563	226	337	316	247	246	317
Cabrillo	2018	ESL	2328	1194	1134	1442	886	1515	813
Cerritos	2018	ESL	2451	1864	587	2394	57	1256	1195
Chabot-Las Positas	2018	ESL	1062	364	698	852	210	903	159
Chaffey	2018	ESL	1192	721	471	1028	164	764	428
Citrus	2018	ESL	1423	830	593	1203	220	1070	353

Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
Coast	2018	ESL	2201	440	1761	1747	454	1180	1021
Compton	2018	ESL	1065	683	382	1050	15	842	223
Contra Costa	2018	ESL	1348	425	923	943	405	597	751
Copper Mountain	2018	ESL	388	155	233	237	151	64	324
Desert	2018	ESL	3232	2608	624	2999	233	860	2372
El Camino	2018	ESL	1910	1006	904	1703	207	1443	467
Feather River	2018	ESL							
Foothill-Deanza	2018	ESL	878	290	588	646	232	137	741
Gavilan	2018	ESL	1600	1275	325	1433	167	377	1223
Glendale	2018	ESL	6237	1025	5212	2258	3979	2503	3734
Grossmont-Cuyamaca	2018	ESL	446	114	332	236	210	202	244
Hartnell	2018	ESL	399	344	55	370	29	231	168
Imperial	2018	ESL	1535	1451	84	1509	26	1104	431
Kern	2018	ESL	2740	1899	841	2265	475	2191	549
Lake Tahoe	2018	ESL	596	172	424	246	350	167	429
Lassen	2018	ESL	150	27	123	55	95	75	75
Long Beach	2018	ESL	2483	1710	773	2302	181	655	1828
Los Angeles	2018	ESL	25891	17321	8570	23275	2616	7847	18044
Los Rios	2018	ESL	5114	1521	3593	3681	1433	4375	739
Marin	2018	ESL	2360	1184	1176	1805	555	211	2149
Mendocino-Lake	2018	ESL	851	553	298	646	205	368	483
Merced	2018	ESL	1654	1284	370	1516	138	565	1089
Mira Costa	2018	ESL	2587	1633	954	2154	433	237	2350
Monterey	2018	ESL	1158	465	693	729	429	347	811
Mt. San Antonio	2018	ESL	28552	15162	13390	27236	1316	3180	25372
Mt. San Jacinto	2018	ESL	2514	399	2115	2437	77	176	2338
Napa Valley	2018	ESL	608	220	388	429	179	195	413
North Orange	2018	ESL	11471	5775	5696	10401	1070	2796	8675
Ohlone	2018	ESL	443	73	370	368	75	152	291
Palo Verde	2018	ESL	783	646	137	703	80	270	513
Palomar	2018	ESL	5614	3525	2089	4547	1067	1941	3673
Pasadena	2018	ESL	4448	1749	2699	4100	348	1175	3273
Peralta	2018	ESL	2004	435	1569	1603	401	1483	521
Rancho Santiago	2018	ESL	24908	17500	7408	22491	2417	5957	18951
Redwoods	2018	ESL	698	259	439	392	306	310	388
Rio Hondo	2018	ESL	758	583	175	688	70	217	541
Riverside	2018	ESL	348	156	192	245	103	165	183
San Bernardino	2018	ESL	563	289	274	419	144	332	231
San Diego	2018	ESL	16336	7746	8590	14197	2139	4607	11729
San Francisco	2018	ESL	29186	9629	19557	26612	2574	8761	20425
San Joaquin Delta	2018	ESL	965	432	533	762	203	778	187
San Jose-Evergreen	2018	ESL	1720	533	1187	1531	189	731	989
San Luis Obispo	2018	ESL	985	667	318	761	224	347	638
San Mateo	2018	ESL	1510	632	878	1145	365	833	677
Santa Barbara	2018	ESL	1313	329	984	1214	99	509	804
Santa Clarita	2018	ESL	1568	842	726	1187	381	450	1118
Santa Monica	2018	ESL	2789	1187	1602	2125	664	1453	1336
Sequoias	2018	ESL	729	556	173	684	45	146	583
Shasta-Tehama-Trinity	2018	ESL	1358	362	996	658	700	579	779

Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
Sierra	2018	ESL	503	207	296	298	205	237	266
Siskiyou	2018	ESL	3060	2690	370	2857	203	373	2687
Solano	2018	ESL	338	83	255	243	95	233	105
Sonoma	2018	ESL	5477	3598	1879	4424	1053	1941	3536
South Orange	2018	ESL	5681	1739	3942	3645	2036	937	4744
Southwestern	2018	ESL	893	596	297	781	112	349	544
State Center	2018	ESL	2052	1249	803	1672	380	1469	583
Ventura	2018	ESL	806	441	365	570	236	351	455
Victor Valley	2018	ESL	1654	1033	621	1373	281	1193	461
West Hills	2018	ESL	475	351	124	401	74	306	169
West Kern	2018	ESL	171	99	72	121	50	122	49
West Valley-Mission	2018	ESL	1221	295	926	986	235	410	811
Yosemite	2018	ESL	2384	1333	1051	1823	561	1107	1277
Yuba	2018	ESL	577	329	248	477	100	226	351
Allan Hancock	2018	Non-ESL	15951	8704	7247	10582	5369	12678	3273
Antelope Valley	2018	Non-ESL	17651	9302	8349	14095	3556	15480	2171
Barstow	2018	Non-ESL	4686	1781	2905	3271	1415	3868	818
Butte	2018	Non-ESL	15004	3918	11086	6506	8498	11671	3333
Cabrillo	2018	Non-ESL	14648	5707	8941	7628	7020	8460	6188
Cerritos	2018	Non-ESL	30127	20693	9434	28752	1375	22528	7599
Chabot-Las Positas	2018	Non-ESL	29042	10228	18814	22072	6970	25640	3402
Chaffey	2018	Non-ESL	28750	18624	10126	24419	4331	23260	5490
Citrus	2018	Non-ESL	18758	11547	7211	15841	2917	16215	2543
Coast	2018	Non-ESL	63207	20393	42814	43192	20015	42448	20759
Compton	2018	Non-ESL	10038	5774	4264	9612	426	8792	1246
Contra Costa	2018	Non-ESL	44885	14395	30490	31743	13142	28609	16276
Copper Mountain	2018	Non-ESL	2601	861	1740	1397	1204	2062	539
Desert	2018	Non-ESL	13274	9377	3897	10764	2510	11230	2044
El Camino	2018	Non-ESL	30010	15545	14465	25986	4024	23784	6226
Feather River	2018	Non-ESL							
Foothill-Deanza	2018	Non-ESL	58262	14801	43461	42282	15980	24573	33689
Gavilan	2018	Non-ESL	7803	4369	3434	5452	2351	4476	3327
Glendale	2018	Non-ESL	19949	6538	13411	10701	9248	14284	5665
Grossmont-Cuyamaca	2018	Non-ESL	31656	11009	20647	18582	13074	25379	6277
Hartnell	2018	Non-ESL	16911	9891	7020	12575	4336	9743	7168
Imperial	2018	Non-ESL	9341	8420	921	8904	437	8274	1067
Kern	2018	Non-ESL	37556	22322	15234	28153	9403	29074	8482
Lake Tahoe	2018	Non-ESL	5947	1374	4573	2769	3178	2847	3100
Lassen	2018	Non-ESL	4294	1428	2866	2754	1540	3351	943
Long Beach	2018	Non-ESL	32016	18540	13476	27604	4412	24803	7213
Los Angeles	2018	Non-ESL	173604	94741	78863	146400	27204	124332	49272
Los Rios	2018	Non-ESL	90789	23665	67124	58671	32118	66788	24001
Marin	2018	Non-ESL	6179	1814	4365	3035	3144	3191	2988
Mendocino-Lake	2018	Non-ESL	4761	1327	3434	1959	2802	3318	1443
Merced	2018	Non-ESL	15263	8559	6704	11926	3337	11538	3725
Mira Costa	2018	Non-ESL	21974	7842	14132	12408	9566	12060	9914
Monterey	2018	Non-ESL	11623	4509	7114	6977	4646	6151	5472
Mt. San Antonio	2018	Non-ESL	40345	23267	17078	35813	4532	28314	12031
Mt. San Jacinto	2018	Non-ESL	21327	10440	10887	15229	6098	16550	4777

## Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
Napa Valley	2018	Non-ESL	8387	3342	5045	5831	2556	5132	3255
North Orange	2018	Non-ESL	63231	27263	35968	50516	12715	39496	23735
Ohlone	2018	Non-ESL	13249	3054	10195	10647	2602	5897	7352
Palo Verde	2018	Non-ESL	6475	2369	4106	3908	2567	4132	2343
Palomar	2018	Non-ESL	30526	12842	17684	18748	11778	19497	11029
Pasadena	2018	Non-ESL	37003	17992	19011	31188	5815	26512	10491
Peralta	2018	Non-ESL	29940	7150	22790	23993	5947	23786	6154
Rancho Santiago	2018	Non-ESL	64852	33028	31824	49980	14872	33386	31466
Redwoods	2018	Non-ESL	6193	1297	4896	2746	3447	4638	1555
Rio Hondo	2018	Non-ESL	29875	20777	9098	27125	2750	19219	10656
Riverside	2018	Non-ESL	49533	30061	19472	39600	9933	37956	11577
San Bernardino	2018	Non-ESL	26572	16022	10550	21374	5198	21221	5351
San Diego	2018	Non-ESL	87241	29682	57559	56576	30665	55221	32020
San Francisco	2018	Non-ESL	39071	9246	29825	28878	10193	22651	16420
San Joaquin Delta	2018	Non-ESL	22617	10452	12165	17837	4780	18486	4131
San Jose-Evergreen	2018	Non-ESL	22763	10069	12694	20213	2550	14703	8060
San Luis Obispo	2018	Non-ESL	12054	3399	8655	4902	7152	7841	4213
San Mateo	2018	Non-ESL	27404	9119	18285	20888	6516	15039	12365
Santa Barbara	2018	Non-ESL	20512	7154	13358	12341	8171	15502	5010
Santa Clarita	2018	Non-ESL	29564	13712	15852	20058	9506	15989	13575
Santa Monica	2018	Non-ESL	42250	14917	27333	28595	13655	25587	16663
Sequoias	2018	Non-ESL	14271	9657	4614	11122	3149	11979	2292
Shasta-Tehama-Trinity	2018	Non-ESL	12246	2069	10177	4101	8145	7391	4855
Sierra	2018	Non-ESL	24255	6300	17955	10614	13641	15035	9220
Siskiyou	2018	Non-ESL	3291	485	2806	1316	1975	1625	1666
Solano	2018	Non-ESL	12338	3637	8701	8834	3504	9200	3138
Sonoma	2018	Non-ESL	32419	8997	23422	16457	15962	16850	15569
South Orange	2018	Non-ESL	50038	11289	38749	24999	25039	23125	26913
Southwestern	2018	Non-ESL	26213	17250	8963	22917	3296	20836	5377
State Center	2018	Non-ESL	49971	28593	21378	38153	11818	37361	12610
Ventura	2018	Non-ESL	41185	21007	20178	26942	14243	26799	14386
Victor Valley	2018	Non-ESL	14857	7880	6977	10844	4013	12095	2762
West Hills	2018	Non-ESL	9048	5811	3237	7196	1852	6799	2249
West Kern	2018	Non-ESL	11745	6796	4949	8254	3491	6657	5088
West Valley-Mission	2018	Non-ESL	23406	5713	17693	16689	6717	10317	13089
Yosemite	2018	Non-ESL	26334	12100	14234	15447	10887	22335	3999
Yuba	2018	Non-ESL	11500	4615	6885	7418	4082	9439	2061
Allan Hancock	2019	ESL	3761	3146	615	3409	352	1185	2576
Antelope Valley	2019	ESL	614	428	186	555	59	240	374
Barstow	2019	ESL	57	36	21	44	13	22	35
Butte	2019	ESL	710	241	469	447	263	248	462
Cabrillo	2019	ESL	3881	1980	1901	2428	1453	2484	1397
Cerritos	2019	ESL	2302	1720	582	2163	139	1072	1230
Chabot-Las Positas	2019	ESL	1118	383	735	914	204	925	193
Chaffey	2019	ESL	948	543	405	828	120	529	419
Citrus	2019	ESL	1364	757	607	1153	211	930	434
Coast	2019	ESL	2707	494	2213	2219	488	976	1731
Compton	2019	ESL	653	403	250	638	15	531	122
Contra Costa	2019	ESL	1389	450	939	957	432	602	787



Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
Copper Mountain	2019	ESL	354	146	208	219	135	125	229
Desert	2019	ESL	3014	2473	541	2838	176	687	2327
El Camino	2019	ESL	1528	800	728	1344	184	1085	443
Feather River	2019	ESL	11						
Foothill-Deanza	2019	ESL	2343	785	1558	1767	576	430	1913
Gavilan	2019	ESL	1443	1127	316	1298	145	225	1218
Glendale	2019	ESL	5996	1027	4969	2158	3838	2673	3323
Grossmont-Cuyamaca	2019	ESL	538	170	368	304	234	228	310
Hartnell	2019	ESL	627	555	72	596	31	253	374
Imperial	2019	ESL	1351	1277	74	1319	32	1033	318
Kern	2019	ESL	2226	1611	615	1907	319	1610	616
Lake Tahoe	2019	ESL	664	188	476	276	388	187	477
Lassen	2019	ESL	150	35	115	72	78	95	55
Long Beach	2019	ESL	2401	1631	770	2207	194	609	1792
Los Angeles	2019	ESL	23246	15747	7499	20558	2688	5535	17711
Los Rios	2019	ESL	3531	903	2628	2413	1118	2934	597
Marin	2019	ESL	2400	1283	1117	1883	517	228	2172
Mendocino-Lake	2019	ESL	998	618	380	742	256	481	517
Merced	2019	ESL	1623	1327	296	1524	99	435	1188
Mira Costa	2019	ESL	2669	1654	1015	2195	474	246	2423
Monterey	2019	ESL	1073	419	654	656	417	330	743
Mt. San Antonio	2019	ESL	30442	14720	15722	29127	1315	3738	26704
Mt. San Jacinto	2019	ESL	2384	324	2060	2279	105	157	2227
Napa Valley	2019	ESL	709	241	468	518	191	257	452
North Orange	2019	ESL	10020	5272	4748	9156	864	2448	7572
Ohlone	2019	ESL	464	80	384	371	93	147	317
Palo Verde	2019	ESL	335	199	136	265	70	236	99
Palomar	2019	ESL	5804	3592	2212	4614	1190	2096	3708
Pasadena	2019	ESL	3665	1280	2385	3355	310	695	2970
Peralta	2019	ESL	2160	573	1587	1777	383	1398	762
Rancho Santiago	2019	ESL	19608	13737	5871	17630	1978	4389	15219
Redwoods	2019	ESL	738	264	474	424	314	365	373
Rio Hondo	2019	ESL	764	577	187	710	54	172	592
Riverside	2019	ESL	500	226	274	352	148	227	273
San Bernardino	2019	ESL	569	319	250	453	116	266	303
San Diego	2019	ESL	14946	7353	7593	13121	1825	4101	10845
San Francisco	2019	ESL	26236	8894	17342	24091	2145	6657	19579
San Joaquin Delta	2019	ESL	661	307	354	534	127	502	159
San Jose-Evergreen	2019	ESL	2032	597	1435	1820	212	818	1214
San Luis Obispo	2019	ESL	1059	666	393	759	300	331	728
San Mateo	2019	ESL	899	320	579	683	216	434	465
Santa Barbara	2019	ESL	1315	333	982	1219	96	512	803
Santa Clarita	2019	ESL	1695	934	761	1274	421	468	1227
Santa Monica	2019	ESL	1763	500	1263	1191	572	577	1186
Sequoias	2019	ESL	651	534	117	612	39	126	525
Shasta-Tehama-Trinity	2019	ESL	1060	267	793	573	487	489	571
Sierra	2019	ESL	336	123	213	207	129	100	236
Siskiyou	2019	ESL	2349	2261	88	2317	32	75	2274
Solano	2019	ESL	275	91	184	204	71	176	99

Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
Sonoma	2019	ESL	4878	3304	1574	4005	873	1711	3167
South Orange	2019	ESL	5850	1494	4356	3956	1894	990	4860
Southwestern	2019	ESL	1280	824	456	1094	186	449	831
State Center	2019	ESL	1605	990	615	1326	279	1003	602
Ventura	2019	ESL	901	483	418	627	274	369	532
Victor Valley	2019	ESL	1444	899	545	1219	225	1016	428
West Hills	2019	ESL	653	505	148	579	74	339	314
West Kern	2019	ESL	126	63	63	96	30	80	46
West Valley-Mission	2019	ESL	1203	218	985	985	218	271	932
Yosemite	2019	ESL	2618	1496	1122	2006	612	1006	1612
Yuba	2019	ESL	706	433	273	622	84	246	460
Allan Hancock	2019	Non-ESL	14545	8389	6156	10222	4323	11877	2668
Antelope Valley	2019	Non-ESL	17674	9754	7920	14455	3219	15542	2132
Barstow	2019	Non-ESL	4693	1921	2772	3396	1297	3882	811
Butte	2019	Non-ESL	14345	3865	10480	6441	7904	11008	3337
Cabrillo	2019	Non-ESL	12070	4884	7186	6415	5655	7044	5026
Cerritos	2019	Non-ESL	30150	20429	9721	27625	2525	22109	8041
Chabot-Las Positas	2019	Non-ESL	28485	10255	18230	21976	6509	25249	3236
Chaffey	2019	Non-ESL	28706	18777	9929	24517	4189	23377	5329
Citrus	2019	Non-ESL	18293	11641	6652	15656	2637	15266	3027
Coast	2019	Non-ESL	61391	20358	41033	42551	18840	40858	20533
Compton	2019	Non-ESL	9467	5501	3966	9039	428	8276	1191
Contra Costa	2019	Non-ESL	44583	14857	29726	32034	12549	27394	17189
Copper Mountain	2019	Non-ESL	2264	836	1428	1284	980	1915	349
Desert	2019	Non-ESL	13556	9731	3825	11156	2400	11655	1901
El Camino	2019	Non-ESL	29739	15565	14174	25928	3811	23114	6625
Feather River	2019	Non-ESL	3330						
Foothill-Deanza	2019	Non-ESL	53577	13739	39838	39284	14293	22690	30887
Gavilan	2019	Non-ESL	8390	4643	3747	5935	2455	4655	3735
Glendale	2019	Non-ESL	18759	5972	12787	9838	8921	13473	5286
Grossmont-Cuyamaca	2019	Non-ESL	30140	10642	19498	17850	12290	24054	6086
Hartnell	2019	Non-ESL	16764	10004	6760	12576	4188	9624	7140
Imperial	2019	Non-ESL	9385	8539	846	8958	427	8421	964
Kern	2019	Non-ESL	39307	24210	15097	30140	9167	30908	8399
Lake Tahoe	2019	Non-ESL	6498	1608	4890	3121	3377	3091	3407
Lassen	2019	Non-ESL	4706	1624	3082	3070	1636	3800	906
Long Beach	2019	Non-ESL	32232	18815	13417	27855	4377	24881	7351
Los Angeles	2019	Non-ESL	167499	93102	74397	141502	25997	123168	44331
Los Rios	2019	Non-ESL	91327	25251	66076	59978	31349	67432	23895
Marin	2019	Non-ESL	5953	1833	4120	2989	2964	3047	2906
Mendocino-Lake	2019	Non-ESL	4579	1343	3236	1961	2618	3119	1460
Merced	2019	Non-ESL	15176	8127	7049	12069	3107	11656	3520
Mira Costa	2019	Non-ESL	20761	7688	13073	12016	8745	11428	9333
Monterey	2019	Non-ESL	11223	4696	6527	7185	4038	6297	4926
Mt. San Antonio	2019	Non-ESL	38902	22801	16101	34708	4194	26825	12077
Mt. San Jacinto	2019	Non-ESL	21569	10774	10795	15669	5900	16603	4966
Napa Valley	2019	Non-ESL	7468	3013	4455	5182	2286	4486	2982
North Orange	2019	Non-ESL	61963	26308	35655	50127	11836	37889	24074
Ohline	2019	Non-ESL	13831	3283	10548	10931	2900	5668	8163

Appendix C: Raw ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)
Palo Verde	2019	Non-ESL	6215	2278	3937	3764	2451	3901	2314
Palomar	2019	Non-ESL	29722	12956	16766	18757	10965	19010	10712
Pasadena	2019	Non-ESL	36665	17791	18874	31059	5606	26609	10056
Peralta	2019	Non-ESL	28257	7087	21170	22703	5554	22691	5566
Rancho Santiago	2019	Non-ESL	69928	36160	33768	54624	15304	34701	35227
Redwoods	2019	Non-ESL	6236	1366	4870	2777	3459	4645	1591
Rio Hondo	2019	Non-ESL	29957	20902	9055	27266	2691	19541	10416
Riverside	2019	Non-ESL	50210	30949	19261	40537	9673	38448	11762
San Bernardino	2019	Non-ESL	26809	16356	10453	21639	5170	21278	5531
San Diego	2019	Non-ESL	84333	28891	55442	55024	29309	52630	31703
San Francisco	2019	Non-ESL	41003	9854	31149	30818	10185	23769	17234
San Joaquin Delta	2019	Non-ESL	22912	10818	12094	18355	4557	18618	4294
San Jose-Evergreen	2019	Non-ESL	22659	9606	13053	20586	2073	14601	8058
San Luis Obispo	2019	Non-ESL	12376	3601	8775	5247	7129	7853	4523
San Mateo	2019	Non-ESL	26409	8940	17469	20278	6131	14440	11969
Santa Barbara	2019	Non-ESL	19727	6968	12759	12034	7693	14941	4786
Santa Clarita	2019	Non-ESL	31315	14492	16823	21452	9863	15950	15365
Santa Monica	2019	Non-ESL	41869	15103	26766	28892	12977	25674	16195
Sequoias	2019	Non-ESL	14400	9789	4611	11283	3117	12022	2378
Shasta-Tehama-Trinity	2019	Non-ESL	9685	1597	8088	3294	6391	7298	2387
Sierra	2019	Non-ESL	24183	6356	17827	10808	13375	14897	9286
Siskiyou	2019	Non-ESL	2940	425	2515	1104	1836	1735	1205
Solano	2019	Non-ESL	12273	3783	8490	8918	3355	9104	3169
Sonoma	2019	Non-ESL	31547	9163	22384	16967	14580	16351	15196
South Orange	2019	Non-ESL	49039	11092	37947	25211	23828	22310	26729
Southwestern	2019	Non-ESL	26492	16975	9517	22692	3800	20423	6069
State Center	2019	Non-ESL	49814	28774	21040	38388	11426	38453	11361
Ventura	2019	Non-ESL	40480	21089	19391	26977	13503	26433	14047
Victor Valley	2019	Non-ESL	14625	8004	6621	10899	3726	11847	2778
West Hills	2019	Non-ESL	9717	6299	3418	7818	1899	7111	2606
West Kern	2019	Non-ESL	11547	6821	4726	8232	3315	6513	5034
West Valley-Mission	2019	Non-ESL	23611	5880	17731	17238	6373	10226	13385
Yosemite	2019	Non-ESL	26737	12594	14143	15932	10805	21584	5153
Yuba	2019	Non-ESL	11113	4552	6561	7318	3795	9180	1933

Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Allan Hancock	2015	ESL	-0.3009	-0.2605	-0.3859	-0.1862	-0.7938	0.8058	-0.9405	0.4198	-0.3649
Antelope Valley	2015	ESL	-0.5772	-1.5701	0.6054	-0.5988	-0.4001	0.9372	-2.0153	0.1705	-0.7722
Barstow	2015	ESL	1.2206	0.6470	1.6425	0.8351	1.5512	1.6123	0.7341	0.7071	0.7071
Butte	2015	ESL	-1.5901	-0.1569	-1.5624	-0.6197	-1.8352	0.2828	-1.5876	1.2122	-1.4462
Cabrillo	2015	ESL	-0.3669	-0.6539	0.0000	-0.5252	-0.0399	-0.2864	-0.4040	-0.3233	-0.3491
Cerritos	2015	ESL	0.8959	-0.3530	1.9411	-0.0949	1.3351	0.9958	-0.7466	1.3839	0.4593
Chabot-Las Positas	2015	ESL	-0.5040	-0.1158	-0.7638	-0.5860	-0.1410	0.0566	-1.4858	-1.8794	0.6544
Chaffey	2015	ESL	1.2034	1.2071	1.1601	1.2167	1.1104	1.2424	0.5906	0.9758	1.2167
Citrus	2015	ESL	0.9315	0.9197	0.9511	0.8381	1.2409	1.0252	-1.1614	0.6211	0.9419
Coast	2015	ESL	-1.0607	-1.5491	-0.9712	-0.9523	-1.0652	-0.5380	-0.8881	-0.2747	-1.1006
Compton	2015	ESL	1.0342	0.8423	1.2332	1.0865	1.4193	0.9571	1.4045	0.4005	1.0984
Contra Costa	2015	ESL	0.1791	-0.6468	0.7401	0.0150	0.5564	1.4750	-0.7702	-0.8500	0.5415
Copper Mountain	2015	ESL	-1.3884	-1.6846	-0.4394	-1.7482	-0.3360	-1.1637	0.0890		
Desert	2015	ESL	-0.7922	-0.7596	-0.9054	-0.8715	0.2708	-0.4348	-0.9878	-0.2323	-0.8088
El Camino	2015	ESL	0.6322	0.4978	0.8532	0.6047	0.8677	0.6497	-0.2697	-1.2434	0.7257
Feather River	2015	ESL	1.6543	0.7071	0.7071			0.7071	0.7071		
Foothill-Deanza	2015	ESL	-0.7082	-0.6244	-0.7443	-0.6919	-0.7560	-0.4953	-0.7436	-0.6610	-0.7143
Gavilan	2015	ESL	-1.2303	-1.1320	-1.0757	-1.2326	-0.8637	0.5568	-1.3231	0.3641	-1.2985
Glendale	2015	ESL	-0.3296	0.3990	-0.5595	-0.2353	-0.3368	0.1647	-0.5675	-1.6460	-0.1629
Grossmont-Cuyamaca	2015	ESL	1.2593	-0.2882	1.7402	-0.2509	1.9539	2.0108	-0.5019	2.0221	0.2166
Hartnell	2015	ESL	1.1279	1.2251	0.6256	1.0914	1.4486	1.4549	0.2578	-1.2677	1.2425
Imperial	2015	ESL	-0.2615	-0.3387	1.3451	-0.2240	-1.1400	0.2620	-1.6688	0.1334	-0.4174
Kern	2015	ESL	0.0615	-0.0156	0.2266	0.0489	0.1164	0.2834	-1.6805	0.5765	-0.0082
Lake Tahoe	2015	ESL	0.6434	1.8861	-0.8699	1.7432	-0.9536	1.8439	-1.2703	0.6911	0.5089
Lassen	2015	ESL	1.3638	1.3205	1.4621	1.4335	0.7502	1.7174	1.2731		1.4995
Long Beach	2015	ESL	-0.8364	-1.7456	0.9369	-0.8595	-0.7036	1.9013	-1.6323	1.8323	-1.4173
Los Angeles	2015	ESL	0.3970	0.4670	0.1086	0.4528	-1.4329	1.0228	-1.7346	0.9549	0.3047
Los Rios	2015	ESL	0.5975	0.3463	0.7361	0.5586	0.7204	0.6608	-1.0271	0.6120	0.5934
Marin	2015	ESL	1.2835	0.6047	0.6763	1.5503	-0.9685	1.2464	0.4443	1.0553	1.2416
Mendocino-Lake	2015	ESL	0.0372	-0.5103	0.5180	-0.3163	0.5858	0.4189	-0.9899	0.7428	-0.0018
Merced	2015	ESL	-0.9509	-1.0762	0.2503	-1.0037	0.7706	0.5442	-1.1003	-0.5900	-0.9616
Mira Costa	2015	ESL	-0.1686	0.1209	-0.6395	-0.3165	0.4401	1.2576	-1.2921	0.8839	-0.3237
Monterey	2015	ESL	-0.0683	-0.3841	0.2084	-0.1568	0.0578	0.4254	-0.5994	-0.0535	-0.0688
Mt. San Antonio	2015	ESL	-1.6100	-1.5416	-1.6259	-1.6037	-1.7464	-0.0380	-1.6892	-0.4254	-1.6174
Mt. San Jacinto	2015	ESL	-1.9694	0.1749	-1.9935	-1.9654	0.6173	-0.2728	-1.9895	-1.6426	-1.9730
Napa Valley	2015	ESL	0.8681	0.8863	0.8121	0.8671	0.6680	0.7503	0.8353	0.6455	0.8729
North Orange	2015	ESL	1.1632	1.1161	1.2010	1.1668	1.1177	0.8608	1.2165	1.4093	1.1489
Ohlone	2015	ESL	1.2972	-0.0564	1.4684	1.3358	0.9804	1.1153	1.1913	1.5555	1.2194
Palo Verde	2015	ESL	0.3479	0.2901	0.6523	0.3312	0.6047	0.2281	0.3690	0.0604	0.3599
Palomar	2015	ESL	-1.6643	-1.7343	-1.5248	-1.6788	-1.5439	-1.4845	-1.7741	1.0362	-1.6587
Pasadena	2015	ESL	0.3331	0.5760	-0.1184	0.4206	-1.0126	0.2740	0.3630	0.0701	0.3479
Peralta	2015	ESL	0.8563	0.2716	1.1217	1.1774	-1.1507	1.5949	0.1871	-0.5362	0.9334
Rancho Santiago	2015	ESL	1.5859	1.5615	-0.0205	1.5416	1.6160	1.1043	1.6915	1.2354	1.5947
Redwoods	2015	ESL	0.4224	1.5652	-1.1495	1.5350	-0.9981	-0.9334	1.1411	1.3908	-0.0492
Rio Hondo	2015	ESL	-1.3379	-1.0728	-1.7947			-1.4281	-1.0095	-1.3611	-1.2768
Riverside	2015	ESL	0.6013	1.2372	-0.2238	0.7248	0.0881	1.5206	-0.6015	0.6228	0.5870
San Bernardino	2015	ESL	-0.8547	-0.9230	-0.7092	-0.9944	0.1902	-0.4198	-0.7079	-1.1334	-0.8007
San Diego	2015	ESL	0.7782	0.9206	0.6318	0.8214	0.3844	1.0526	0.6498	0.6424	0.7876
San Francisco	2015	ESL	1.3457	1.0641	1.4390	1.4147	0.7215	1.3150	1.2228	0.3600	1.4175
San Joaquin Delta	2015	ESL	1.1044	0.9981	1.1784	1.0821	1.1391	1.1792	-0.7879	1.0003	1.1082
San Jose-Evergreen	2015	ESL	-0.7008	-0.8011	-0.6582	-0.6774	-0.9090	0.9730	-0.9032	-0.0603	-0.8281

Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
San Luis Obispo	2015	ESL	-1.4730	-1.4356	-1.3340	-1.3244	-1.4568	-0.8948	-1.6764	-1.2455	-1.4964
San Mateo	2015	ESL	1.0922	1.1205	1.0510	1.1334	0.8558	1.1819	0.8193	1.2885	1.0307
Santa Barbara	2015	ESL	2.0292	2.0401	-0.1648	2.0295	2.0236	2.0203	2.0302	1.7487	2.0349
Santa Clarita	2015	ESL	1.8947	1.8537	1.9119	1.8778	1.9057	2.0122	1.4431	1.4575	1.8956
Santa Monica	2015	ESL	1.0378	1.0122	1.0899	1.0361	1.0390	1.0101	1.1221	0.9041	1.0480
Sequoias	2015	ESL	-1.3646	-1.8905	-0.0861	-1.2409	-1.7700	-1.7772	-1.0025	0.1195	-1.4073
Shasta-Tehama-Trinity	2015	ESL	0.6974	0.4496	0.7737	0.3007	0.8335	1.2230	-0.2000	1.6958	0.6518
Sierra	2015	ESL	1.1268	0.7310	1.2572	0.6533	1.3579	1.0376	0.6442	0.9526	1.0834
Siskiyou	2015	ESL	-0.5018	-1.0820	1.2002	-0.8579	1.0354	1.1318	-1.0423	-0.4476	-0.4951
Solano	2015	ESL	1.5146	1.6800	1.4033	1.6364	0.5988	1.5610	-0.7855	-0.2622	1.6201
Sonoma	2015	ESL	-0.3565	-0.2243	-0.5353	-0.5467	0.1158	-1.3563	0.7163	-0.9042	-0.2011
South Orange	2015	ESL	-1.6382	-1.6880	-1.5171	-1.6016	-1.5700	-1.9486	-1.5719	-1.1681	-1.4642
Southwestern	2015	ESL	1.3757	0.6549	1.8869	0.9189	1.9340	2.0259	-0.9135	1.4468	1.3372
State Center	2015	ESL	0.8082	0.4800	1.1911	0.6406	1.2469	0.8361	-0.8892	-0.4720	0.8651
Ventura	2015	ESL	-0.9010	-0.7651	-1.0585	-0.8935	-0.4840	1.6630	-1.1436	1.1640	-0.9808
Victor Valley	2015	ESL	-0.7981	-0.8922	-0.5588	-0.8060	-0.7442	-0.7573	-1.1205	-1.3073	-0.7765
West Hills	2015	ESL	1.9344	1.8127	1.9685	1.8802	1.9509	1.9321	1.1786	-0.4547	1.9470
West Kern	2015	ESL	1.1879	1.2164	0.8702	1.2317	0.7428	1.0775	1.2043	0.7071	-0.7071
West Valley-Mission	2015	ESL	1.1493	0.4863	1.2627	1.1927	1.0648	1.1184	0.6965	0.8247	1.3051
Yosemite	2015	ESL	-1.1793	-1.0671	-1.2923	-1.1009	-1.3999	-1.0625	-1.1790	-0.7367	-1.2123
Yuba	2015	ESL	-0.1658	-0.5131	0.0954	-0.5688	0.4522	0.2562	-0.8476	-0.3139	-0.1378
Allan Hancock	2015	Non-ESL	1.3219	1.5000	1.2435	1.4881	1.1865	1.3664	1.2597	1.5333	1.3100
Antelope Valley	2015	Non-ESL	1.2258	-1.2870	1.6205	-0.6222	1.1855	1.3574	-0.0445	1.8403	-0.2123
Barstow	2015	Non-ESL	1.3728	0.4996	1.0854	1.3096	1.2530	1.4893	0.9960	0.7071	0.7071
Butte	2015	Non-ESL	1.2962	-1.7631	1.4540	-1.5076	1.3521	1.2602	-1.1081	0.3508	1.2471
Cabrillo	2015	Non-ESL	1.0343	0.0566	1.1794	0.3204	1.2291	1.1998	0.6579	1.3602	1.0089
Cerritos	2015	Non-ESL	-0.1677	-1.8482	1.6999	-1.7093	1.4472	1.4777	-1.3114	1.6273	-0.4477
Chabot-Las Positas	2015	Non-ESL	-1.7962	-1.8179	-0.6443	-1.8372	0.9306	-1.6216	-1.2226	1.6022	-1.8915
Chaffey	2015	Non-ESL	-1.7376	-1.6820	-1.3323	-1.6925	0.5345	-1.7887	-1.5964	-1.0551	-1.7490
Citrus	2015	Non-ESL	-1.5933	-1.6922	-0.2585	-1.7570	1.0367	-0.4522	-0.8289	0.4146	-1.7391
Coast	2015	Non-ESL	0.7227	-1.3011	0.9031	0.0612	0.9640	0.4633	1.1355	0.9316	0.6743
Compton	2015	Non-ESL	0.6458	0.0218	1.1664	1.0834	0.1725	0.5476	1.3914	-0.3642	1.1069
Contra Costa	2015	Non-ESL	0.4812	-1.8296	1.0176	-1.3513	1.0992	0.5469	0.2038	-1.0538	0.5843
Copper Mountain	2015	Non-ESL	-0.2164	-1.6843	0.5973	-1.7801	0.9901	-0.5918	0.1071		
Desert	2015	Non-ESL	-1.3861	-1.3490	-0.3299	-1.3064	0.4943	-1.3464	0.2943	1.2837	-1.3799
El Camino	2015	Non-ESL	0.2454	-1.3146	1.8990	-0.8099	1.2033	0.0966	0.0636	0.9479	-0.0124
Feather River	2015	Non-ESL	-0.0658	-0.7071	-0.7071			-0.7071	-0.7071		
Foothill-Deanza	2015	Non-ESL	0.6593	0.1059	0.7829	0.6300	0.7009	0.8082	0.4011	1.0111	0.5156
Gavilan	2015	Non-ESL	0.0120	-0.3765	0.1640	-0.3643	0.2925	0.1276	-0.0308	1.2915	-0.0693
Glendale	2015	Non-ESL	0.7845	0.6259	0.8978	0.8101	0.7073	0.6690	1.1072	1.3805	0.4951
Grossmont-Cuyamaca	2015	Non-ESL	0.6422	-0.2998	0.8802	0.3518	0.7778	0.7462	-1.3464	-0.6906	0.9389
Hartnell	2015	Non-ESL	-1.6639	-1.6575	-0.6027	-1.7541	-1.5159	-1.6167	-1.2240	0.8402	-1.6447
Imperial	2015	Non-ESL	-0.8565	-0.9285	-0.0422	-0.6383	-1.8398	-0.8638	-0.5887	1.7077	-1.0332
Kern	2015	Non-ESL	-1.3245	-1.2847	-1.0871	-1.2883	0.3790	-1.1236	0.2631	1.3129	-1.3246
Lake Tahoe	2015	Non-ESL	-0.4193	-1.0112	-0.1105	-1.0155	1.1691	-0.2873	-0.4572	-0.6140	-0.4128
Lassen	2015	Non-ESL	0.9742	-0.7392	1.6922	-0.1784	1.6582	0.0643	1.4444		0.5854
Long Beach	2015	Non-ESL	-1.2992	-1.6310	1.7235	-1.5169	1.6540	-0.6427	-1.8743	0.9614	-1.2483
Los Angeles	2015	Non-ESL	0.5537	-0.4756	0.9470	0.4120	0.9396	0.8437	-0.7617	1.1076	0.3741
Los Rios	2015	Non-ESL	-0.4215	-1.3224	0.7589	-1.7933	1.1511	0.9876	-1.6105	-0.3703	-0.4048
Marin	2015	Non-ESL	1.4737	-1.6223	1.5292	1.6011	1.3838	1.6504	-1.5407	1.5485	1.4382

Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Mendocino-Lake	2015	Non-ESL	0.1311	-1.5566	0.7417	-1.4003	0.6899	0.4942	-1.0270	1.3388	0.0567
Merced	2015	Non-ESL	-1.6881	-1.7607	-0.9737	-1.4438	0.7700	-1.5879	-1.4117	-0.6865	-1.7478
Mira Costa	2015	Non-ESL	0.6475	-1.4247	1.0216	-1.1270	1.0545	-0.3118	1.1849	0.9746	0.5910
Monterey	2015	Non-ESL	0.9318	-1.2008	1.0621	-0.3073	1.3432	0.9426	0.9138	1.2294	0.9211
Mt. San Antonio	2015	Non-ESL	1.1119	1.1785	1.0029	0.9871	1.8191	-0.4341	1.2610	0.7980	1.0767
Mt. San Jacinto	2015	Non-ESL	-1.7506	-1.6437	0.6578	-1.5663	0.8967	-1.8704	-1.4902	1.1521	-1.7166
Napa Valley	2015	Non-ESL	0.9884	-0.0303	1.1518	0.7130	1.1745	1.1265	0.6074	1.4112	0.9567
North Orange	2015	Non-ESL	0.9284	0.0937	1.2593	0.0338	1.2441	0.9911	0.1595	0.5468	0.9554
Ohlone	2015	Non-ESL	1.3497	0.2357	1.4216	0.6031	1.7623	0.9970	1.2575	1.1468	1.2773
Palo Verde	2015	Non-ESL	-1.6294	-1.6679	-1.0872	-1.4743	-1.0700	-1.6340	0.0163	1.0204	-1.6463
Palomar	2015	Non-ESL	1.5725	-1.2118	1.5325	0.0040	1.4836	1.0956	1.7422	0.9273	1.6502
Pasadena	2015	Non-ESL	-0.1458	-1.6475	1.4105	1.9737	-1.9654	-1.4005	1.0884	0.8929	-1.2313
Peralta	2015	Non-ESL	1.2284	1.0868	1.2136	1.1871	1.3649	0.8502	1.5385	0.2709	1.3169
Rancho Santiago	2015	Non-ESL	-0.3239	-0.3235	-0.1457	-0.8860	1.4919	-0.1657	-0.3266	1.1144	-0.4095
Redwoods	2015	Non-ESL	-0.6013	-1.8027	0.2155	-1.8990	0.3828	0.6775	-1.3276	0.3411	-0.6590
Rio Hondo	2015	Non-ESL	0.6729	-1.2039	1.2427			-0.0823	0.9455	0.6646	-0.0173
Riverside	2015	Non-ESL	-1.5687	-1.5817	0.1154	-1.4741	-0.2371	-1.5252	-1.6213	0.8169	-1.5203
San Bernardino	2015	Non-ESL	-1.1257	-1.1978	-0.4705	-1.1514	0.7473	-1.1924	-0.9761	1.3982	-1.1372
San Diego	2015	Non-ESL	0.5235	-0.7602	0.7597	0.2889	0.7248	0.6021	0.0615	1.5446	0.3979
San Francisco	2015	Non-ESL	0.6266	-0.8792	0.9914	0.4132	0.8170	1.2167	-0.0441	1.4412	0.2545
San Joaquin Delta	2015	Non-ESL	-0.0533	-0.9953	1.4553	-0.6046	1.0526	0.7363	-1.0551	1.2300	-0.3453
San Jose-Evergreen	2015	Non-ESL	0.1666	-0.9808	1.1216	-0.6009	1.4831	1.5568	-1.0217	1.4336	-0.7418
San Luis Obispo	2015	Non-ESL	0.0265	0.0105	0.0511	-0.3281	0.9965	1.2899	-0.5657	1.9506	-0.5576
San Mateo	2015	Non-ESL	1.4178	1.4413	1.4073	1.3960	1.4440	1.5575	0.6073	1.0339	1.4350
Santa Barbara	2015	Non-ESL	1.6435	1.6235	1.6475	1.7169	1.5600	-0.6722	1.9868	1.4503	1.6685
Santa Clarita	2015	Non-ESL	-1.2518	-1.5853	-0.3264	-1.3928	1.1280	-1.8273	-0.5177	0.4151	-1.2597
Santa Monica	2015	Non-ESL	0.6464	-1.7454	1.0801	-0.0245	0.6170	-1.5438	1.1365	1.1316	-0.5402
Sequoias	2015	Non-ESL	-1.6292	-1.5457	1.3491	-1.5365	1.2889	-1.6118	-1.6426	1.3793	-1.6061
Shasta-Tehama-Trinity	2015	Non-ESL	0.0381	-1.0329	0.2862	-0.9344	0.4156	0.0964	0.0278	1.4976	0.0233
Sierra	2015	Non-ESL	0.6650	-0.3378	0.8887	-0.9825	1.1371	1.5594	-1.4368	1.4236	0.1638
Siskiyou	2015	Non-ESL	0.5968	-1.2962	0.8772	0.4719	0.4704	-0.9453	0.7704	-0.9393	0.6319
Solano	2015	Non-ESL	1.4227	-1.4705	1.4571	0.8664	1.2866	1.1672	1.9262	1.1885	1.4443
Sonoma	2015	Non-ESL	0.7562	-0.8937	0.8640	-1.2681	1.1328	1.4632	-0.4846	1.8471	0.4489
South Orange	2015	Non-ESL	-0.1252	-1.0767	0.1907	-1.0062	0.6595	-0.8946	0.6619	-0.5013	-0.0103
Southwestern	2015	Non-ESL	-1.7962	-2.0034	1.9774	-2.0102	1.9681	1.1824	-1.3781	-0.0291	-1.6767
State Center	2015	Non-ESL	-1.0700	-1.2806	1.0718	-1.1605	0.4240	-1.1299	-0.4553	1.3845	-1.1181
Ventura	2015	Non-ESL	0.0136	-1.7155	0.9508	-1.3657	0.7068	0.0870	-0.1122	1.3464	-0.3708
Victor Valley	2015	Non-ESL	0.9517	-1.2586	1.4754	-0.6306	1.4099	0.8057	1.1605	1.4022	0.8377
West Hills	2015	Non-ESL	-1.5509	-1.6424	-0.3390	-1.6254	-0.2451	-1.8166	-0.6973	1.1385	-1.5658
West Kern	2015	Non-ESL	-0.8403	-1.0373	-0.4217	-1.0612	-0.2354	-0.7682	-0.8898	0.7071	0.7071
West Valley-Mission	2015	Non-ESL	0.9958	-0.2452	1.1041	0.4807	1.2963	1.2041	0.4784	1.0717	0.9660
Yosemite	2015	Non-ESL	-0.5902	-1.5052	1.3351	-1.2236	0.9878	-0.9732	0.8997	1.3659	-1.0800
Yuba	2015	Non-ESL	0.2430	-1.6077	0.8511	-0.9568	0.8716	0.5358	-0.1402	1.1917	0.1629
Allan Hancock	2016	ESL	0.5777	0.6488	-1.3988	0.8125	-1.4560	0.5149	0.5012	1.2593	0.4995
Antelope Valley	2016	ESL	1.9319	1.5089	1.6570	1.9287	1.9417	1.5218	0.1117	1.7050	1.8951
Barstow	2016	ESL	0.6730	0.7786	0.4981	0.4593	0.4201	0.6585	0.6118	-0.7071	-0.7071
Butte	2016	ESL	0.3567	1.2351	-0.0327	0.4490	0.1441	0.5456	0.0568	0.6061	0.2670
Cabrillo	2016	ESL	-0.4817	-0.5641	-0.3549	-0.5304	-0.3592	-0.1358	-0.8186	-0.8494	-0.4358
Cerritos	2016	ESL	-1.0387	-0.8625	-0.2307	-0.4406	-0.5730	0.4665	-1.0532	0.4897	-1.2312
Chabot-Las Positas	2016	ESL	0.2520	0.6875	-0.1628	0.2389	0.2819	0.5606	-0.7258	-0.2449	0.3650
Chaffey	2016	ESL	0.6533	0.7575	0.3599	0.6825	0.4735	0.6261	0.9619	1.0262	0.6092

Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Citrus	2016	ESL	1.2421	1.2943	1.0941	1.3065	0.9860	1.1837	-0.3212	1.1315	1.2435
Coast	2016	ESL	-0.9380	-0.8790	-0.9165	-0.8019	-1.1991	-0.3377	-0.8100	-0.9665	-0.9296
Compton	2016	ESL	0.6332	0.6325	0.6216	0.4624	0.6852	0.6537	0.4636	-0.4895	0.4779
Contra Costa	2016	ESL	1.4429	0.6510	1.6092	1.1419	1.7702	0.4699	1.6710	-0.7083	1.6802
Copper Mountain	2016	ESL	1.3016	0.0118	1.6053	0.0000	1.6802	-0.4097	1.0812		
Desert	2016	ESL	0.6576	0.6967	0.4848	0.6767	0.2988	0.2227	0.9189	0.5014	0.6613
El Camino	2016	ESL	0.2340	0.2643	0.1677	0.2346	0.2169	0.4184	-1.6602	0.5247	0.2066
Feather River	2016	ESL	0.2430	-0.7071	-0.7071			-0.7071	-0.7071		
Foothill-Deanza	2016	ESL	-0.6792	-0.6416	-0.6937	-0.6937	-0.6327	-0.4027	-0.7272	-0.8066	-0.6608
Gavilan	2016	ESL	-1.0709	-1.0766	-0.7456	-1.1717	-0.2696	0.5075	-1.1613	-1.4709	-1.0052
Glendale	2016	ESL	0.3153	0.6863	0.1747	0.9748	-0.0068	1.6044	-1.2779	0.1027	0.3249
Grossmont-Cuyamaca	2016	ESL	-1.4633	-1.1906	-1.2375	-1.4459	-0.7402	-0.5241	-1.4768	-0.3535	-1.6627
Hartnell	2016	ESL	0.3435	0.4225	0.0463	0.3489	0.2414	0.7630	-0.2361	-0.3488	0.3740
Imperial	2016	ESL	0.2134	0.1667	0.8446	0.1785	1.0450	0.2802	-0.1863	-0.0100	0.3003
Kern	2016	ESL	0.3485	0.2954	0.4558	0.3106	0.5087	0.3640	-0.3050	0.5035	0.3251
Lake Tahoe	2016	ESL	-0.0215	0.3460	-0.2919	0.2149	-0.2540	0.4283	-0.4334	1.6414	-0.3825
Lassen	2016	ESL	1.1723	1.2211	1.0414	1.0906	1.6027	0.6739	1.2573		
Long Beach	2016	ESL	-0.8833	0.1007	-1.5079	-0.7503	-1.0532	0.2540	-0.5836	0.4113	-0.7213
Los Angeles	2016	ESL	0.8169	0.7572	0.9577	0.8139	-0.6064	0.9302	-0.6099	0.8711	0.7958
Los Rios	2016	ESL	0.7309	0.7228	0.7293	0.7795	0.5626	0.7534	-0.2568	0.7834	0.7233
Marin	2016	ESL	-0.4185	-1.1548	0.4963	-0.6754	0.9242	0.8425	-1.7475	0.9311	-0.7450
Mendocino-Lake	2016	ESL	0.3333	-0.0292	0.6054	0.0855	0.6663	0.5386	-0.3154	0.7428	0.2903
Merced	2016	ESL	-0.9629	-0.9827	-0.2826	-1.0066	0.6708	0.2993	-1.0052	-0.5192	-0.9771
Mira Costa	2016	ESL	-0.0173	0.1731	-0.3561	-0.1080	0.3327	0.5031	-0.4529	0.8176	-0.1471
Monterey	2016	ESL	0.7868	0.3718	1.0789	0.5004	1.1187	0.9711	0.4883	1.3919	0.6977
Mt. San Antonio	2016	ESL	0.0039	0.2022	-0.2350	0.0067	-0.0847	0.0751	-0.0031	-0.2850	0.0089
Mt. San Jacinto	2016	ESL	0.6367	1.7975	0.1395	0.6684	-0.9382	0.9920	0.6016	0.3417	0.6479
Napa Valley	2016	ESL	0.9221	0.9182	0.8789	0.4783	1.6223	0.1020	1.2577	1.6137	0.7981
North Orange	2016	ESL	0.8060	0.8905	0.7242	0.8211	0.6569	0.7851	0.8019	0.5808	0.8153
Ohlone	2016	ESL	-1.5731	-1.7475	-1.4584	-1.5615	-1.4838	-1.2565	-1.4608	-1.5555	-1.5418
Palo Verde	2016	ESL	0.6286	0.6040	0.6779	0.6422	0.3455	0.4782	0.6463	1.2932	0.5889
Palomar	2016	ESL	-0.7183	-0.1701	-0.9989	-0.6304	-0.8089	-0.8396	-0.4483	0.7348	-0.7285
Pasadena	2016	ESL	0.5559	0.9347	-0.1546	0.6180	-0.5611	0.4305	0.6230	0.5646	0.5548
Peralta	2016	ESL	0.5112	-0.1358	0.8711	0.4543	0.2888	0.8306	0.1690	-1.7295	0.9923
Rancho Santiago	2016	ESL	0.3365	-0.3213	0.8290	0.3512	0.1982	0.5164	0.2785	0.6605	0.3259
Redwoods	2016	ESL	-0.4626	0.5241	-1.0222	0.4179	-0.9736	-1.2334	0.6521	-0.1987	-1.2304
Rio Hondo	2016	ESL	-1.1480	-1.3626	-0.4873	-1.5986	-1.4828	-0.9055	-1.2122	-0.6571	-1.1878
Riverside	2016	ESL	-1.0222	-1.1563	-0.6976	-0.9971	-0.8556	-1.2181	-0.4321	-0.3114	-1.0761
San Bernardino	2016	ESL	-1.4806	-1.3666	-1.5803	-1.4109	-1.1069	-0.7601	-1.1832	-1.0515	-1.5129
San Diego	2016	ESL	0.7608	0.7050	0.8081	0.7293	0.9897	0.7410	0.7616	1.0399	0.7388
San Francisco	2016	ESL	0.3934	0.3298	0.4130	0.4100	0.2368	0.7104	-0.4540	0.1794	0.4061
San Joaquin Delta	2016	ESL	0.7558	0.8451	0.6867	0.8285	0.4248	0.7320	0.0740	0.7128	0.7556
San Jose-Evergreen	2016	ESL	-0.8713	-0.5932	-0.9554	-0.8857	-0.7019	-0.7440	-0.8340	-1.2976	-0.7616
San Luis Obispo	2016	ESL	1.2876	1.1609	1.3432	1.2291	1.1086	1.2552	1.1823	1.2797	1.2485
San Mateo	2016	ESL	0.8469	0.8425	0.8501	0.8559	0.7758	0.8662	0.7697	0.9345	0.8162
Santa Barbara	2016	ESL	-0.2400	-0.3504	1.4459	-0.2391	-0.2499	-0.1756	-0.2500	0.5971	-0.3036
Santa Clarita	2016	ESL	0.2273	0.3887	-0.0154	0.3139	0.0268	-0.2200	0.9490	0.9717	0.1617
Santa Monica	2016	ESL	0.8254	0.8785	0.7034	0.8126	0.9619	0.7904	0.9533	0.9041	0.8166
Sequoias	2016	ESL	0.1955	-0.3297	0.5640	0.1785	0.2478	-0.1838	0.3071	-0.5976	0.2328
Shasta-Tehama-Trinity	2016	ESL	0.9399	0.6711	1.0198	0.9480	0.9261	0.7593	0.9446	0.4988	0.9426

Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Sierra	2016	ESL	0.7687	0.6763	0.7874	0.6533	0.8004	0.8881	-0.5284	-1.7691	0.8438
Siskiyou	2016	ESL	-0.7051	-1.0249	0.7567	-0.9661	0.7873	0.7161	-1.0221	-1.5217	-0.6776
Solano	2016	ESL	0.2381	0.4667	0.1554	0.3883	-0.4050	0.5723	-1.5037	-0.3605	0.2946
Sonoma	2016	ESL	1.1123	1.1784	0.9040	1.0546	1.1977	0.6620	1.1369	1.2925	1.0130
South Orange	2016	ESL	-0.8092	-0.7000	-0.8213	-0.7888	-0.7856	0.7985	-0.9042	1.8355	-1.0470
Southwestern	2016	ESL	-1.0295	-1.0720	-0.7311	-1.1624	-0.4598	-0.3303	-0.8602	-0.4545	-1.1165
State Center	2016	ESL	0.7130	0.8409	0.5153	0.7930	0.4557	0.8246	-1.1873	0.1923	0.7259
Ventura	2016	ESL	-1.1156	-1.1476	-0.9476	-1.2238	0.1383	-0.6775	-0.9748	0.4733	-1.0947
Victor Valley	2016	ESL	-0.5534	-0.7147	-0.1854	-0.5765	-0.4183	-0.6139	0.0249	-0.0114	-0.5724
West Hills	2016	ESL	-0.3361	-0.5868	0.0477	-0.4661	0.1511	-0.3626	-0.0644	-0.7370	-0.3133
West Kern	2016	ESL	1.1879	1.2843	0.6754	1.2568	0.6367	0.9352	1.3472	-0.7071	0.7071
West Valley-Mission	2016	ESL	0.6913	1.2930	0.4562	0.7388	0.6035	0.9093	-0.2067	0.9185	0.5506
Yosemite	2016	ESL	-0.8987	-0.9337	-0.8508	-0.9676	-0.6673	-0.7134	-0.9977	-0.9802	-0.8796
Yuba	2016	ESL	0.8083	-0.2252	1.2130	0.5388	0.8871	0.8760	0.1879	1.8048	0.6325
Allan Hancock	2016	Non-ESL	1.0170	0.9065	1.0541	0.9275	1.0422	0.9530	1.0984	0.8000	1.0272
Antelope Valley	2016	Non-ESL	-0.7928	-0.8161	0.6124	-0.9240	0.7410	-0.6663	-1.1125	0.3034	-0.9377
Barstow	2016	Non-ESL	-0.0691	0.7221	-0.2659	-1.0128	0.5728	-0.4454	0.6679	-0.7071	-0.7071
Butte	2016	Non-ESL	0.8333	-0.5942	0.7975	-0.6167	0.8046	0.8406	-0.8400	1.2279	0.6694
Cabrillo	2016	Non-ESL	0.6063	0.3291	0.6224	0.3545	0.6526	0.7066	0.3795	1.1256	0.5761
Cerritos	2016	Non-ESL	-0.4119	-0.1771	-0.0941	0.1995	-0.3619	0.9616	-0.9865	0.7667	-0.5230
Chabot-Las Positas	2016	Non-ESL	0.4677	-0.4060	1.1216	-0.3483	0.9306	0.5967	-0.3587	0.5191	0.3284
Chaffey	2016	Non-ESL	-0.5118	-0.5805	0.2782	-0.5865	0.7862	-0.3384	-0.8212	-0.6896	-0.5025
Citrus	2016	Non-ESL	-0.0161	-0.2574	0.4233	-0.3544	0.7766	0.1719	-0.2666	0.7247	-0.2027
Coast	2016	Non-ESL	1.1647	0.3834	1.1147	1.5566	0.9370	1.3516	0.7367	0.9943	1.2006
Compton	2016	Non-ESL	0.3036	0.1552	0.4107	-0.3846	-1.1209	0.3940	-0.5286	-0.8195	-0.4202
Contra Costa	2016	Non-ESL	1.3925	-0.1608	1.0947	1.4745	0.9578	1.2354	1.1204	-0.9563	1.4061
Copper Mountain	2016	Non-ESL	0.7038	-0.5323	0.8344	-0.1121	0.7273	0.7988	0.5918		
Desert	2016	Non-ESL	-0.5436	-0.6900	1.6969	-0.6576	1.4215	-0.7526	1.5230	0.8793	-0.5775
El Camino	2016	Non-ESL	-1.2788	-0.6232	-0.2839	-1.6316	0.1563	0.4841	-1.5461	0.6438	-1.5376
Feather River	2016	Non-ESL	0.8988	0.7071	0.7071			0.7071	0.7071		
Foothill-Deanza	2016	Non-ESL	0.5878	0.3862	0.6271	0.5874	0.5838	0.9347	0.0894	0.7894	0.5010
Gavilan	2016	Non-ESL	1.9524	1.9345	1.9269	1.8540	1.8328	1.9224	1.9603	1.0640	1.9600
Glendale	2016	Non-ESL	1.1766	1.0545	1.2535	1.1526	1.2080	1.1977	1.0263	0.6945	1.3270
Grossmont-Cuyamaca	2016	Non-ESL	0.5389	-0.0428	0.6731	0.0666	0.7858	0.6109	-0.9786	0.7131	0.4581
Hartnell	2016	Non-ESL	-0.2074	-0.7970	0.8201	-0.3183	-0.0982	-0.8592	0.5025	0.7700	-0.2920
Imperial	2016	Non-ESL	-0.6246	-0.5752	-0.8018	-0.6102	-0.4571	-0.6678	-0.0865	0.6292	-0.6711
Kern	2016	Non-ESL	-0.6903	-0.4332	-1.0799	-0.6763	0.2404	-0.9924	1.7414	0.6806	-0.6900
Lake Tahoe	2016	Non-ESL	-0.4708	-0.5017	-0.4307	-0.6760	0.2995	0.1648	-0.7263	-1.0745	-0.4529
Lassen	2016	Non-ESL	-0.5173	-1.1107	0.3052	-1.0156	0.6352	-1.0259	0.7851		
Long Beach	2016	Non-ESL	-0.8105	-0.7371	0.5121	-0.7587	0.2015	-1.0053	-0.3078	0.9614	-0.8925
Los Angeles	2016	Non-ESL	0.9390	1.0617	0.7499	0.8868	1.0358	1.1059	-0.6410	0.8558	0.9375
Los Rios	2016	Non-ESL	1.7050	-0.7144	1.2863	-0.0137	1.0251	1.3722	0.0495	-0.3570	1.7513
Marin	2016	Non-ESL	0.7357	-0.8436	0.7708	0.5759	0.7360	0.5543	0.9074	0.6685	0.7379
Mendocino-Lake	2016	Non-ESL	0.2665	-0.8587	0.5615	-0.9842	0.6373	0.4222	-0.3149	0.6804	0.2365
Merced	2016	Non-ESL	-0.6034	-0.2755	-0.8113	-0.6968	0.7236	-0.2334	-0.7179	-0.9669	-0.5420
Mira Costa	2016	Non-ESL	0.9514	0.4031	0.8626	0.6879	0.8524	0.9683	0.8212	0.9622	0.9452
Monterey	2016	Non-ESL	0.2295	-1.2197	0.3978	-0.4202	0.5127	-0.3387	0.2695	0.9234	0.2117
Mt. San Antonio	2016	Non-ESL	-0.6249	-0.8200	-0.3902	-0.6756	0.3064	-0.1444	-0.6512	0.7124	-0.6582
Mt. San Jacinto	2016	Non-ESL	-0.4711	-0.7084	1.1028	-0.7483	0.9438	0.4724	-0.9353	0.9759	-0.5457
Napa Valley	2016	Non-ESL	0.8311	0.7113	0.8116	0.7274	0.8744	0.8211	0.8218	0.7917	0.8299
North Orange	2016	Non-ESL	0.8903	1.1364	0.7055	0.8330	0.8473	1.0406	-0.2567	0.9518	0.8832





Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Foothill-Deanza	2017	ESL	-0.6888	-0.7535	-0.6552	-0.6754	-0.7280	-0.6721	-0.6862	-0.6610	-0.6923
Gavilan	2017	ESL	0.5414	1.0345	-0.6465	0.6281	-0.0385	0.7663	0.1540	0.8884	0.4980
Glendale	2017	ESL	1.2307	0.8574	1.2967	1.3782	1.0383	0.1647	1.3132	0.9021	1.2108
Grossmont-Cuyamaca	2017	ESL	-0.3926	-0.1755	-0.4060	-0.1792	-0.3824	-0.3526	-0.1553	-0.5798	-0.1033
Hartnell	2017	ESL	-0.7025	-0.6821	-0.6256	-0.7079	-0.5633	-0.0142	-1.0375	-0.8082	-0.5851
Imperial	2017	ESL	0.7131	0.6968	0.3441	0.6815	1.2350	0.3966	1.0682	0.9459	0.6029
Kern	2017	ESL	0.5904	0.6014	0.5541	0.6146	0.4609	0.5543	-0.0538	0.5327	0.5937
Lake Tahoe	2017	ESL	-1.5730	-0.5915	-1.0275	-1.1940	-0.8787	-0.7566	-0.5380	-0.5183	-1.5015
Lassen	2017	ESL	-0.2923	-0.3014	-0.2675	-0.2857	-0.3069	-0.4478	-0.2567		
Long Beach	2017	ESL	-0.9208	-0.3894	-0.9369	-0.8595	-0.9456	-0.4431	-0.1481	-0.3045	-0.3788
Los Angeles	2017	ESL	1.0421	1.0788	0.8150	1.0228	-0.4673	0.5508	0.8240	0.8322	1.0583
Los Rios	2017	ESL	0.5373	0.6942	0.4428	0.5213	0.5852	0.5408	0.0481	-0.0857	0.5822
Marin	2017	ESL	1.1905	-0.3351	1.2981	0.8084	1.3559	0.5655	1.1699	0.6414	1.2416
Mendocino-Lake	2017	ESL	-1.0967	-1.1883	-0.8515	-1.1968	-0.7557	-1.1651	-0.5777	-1.2734	-1.0159
Merced	2017	ESL	-0.0812	-0.1892	0.5087	-0.1127	0.3714	0.9147	-0.4697	-0.9441	-0.0429
Mira Costa	2017	ESL	1.9543	1.8129	1.6036	2.0050	1.2344	0.8980	1.7269	1.0164	1.9873
Monterey	2017	ESL	0.4038	0.3534	0.4142	0.3212	0.4862	0.1525	0.6287	0.5086	0.3832
Mt. San Antonio	2017	ESL	0.3252	0.2822	0.3635	0.3104	0.7908	0.5016	0.2933	-0.3758	0.3346
Mt. San Jacinto	2017	ESL	0.2096	-0.1667	0.2525	0.2382	-0.7160	-1.0912	0.2632	0.8709	0.1730
Napa Valley	2017	ESL	-0.1709	0.1858	-0.4116	-0.1697	-0.1336	-0.1861	-0.1440	0.0000	-0.1896
North Orange	2017	ESL	0.3341	0.3567	0.3118	0.3276	0.3923	0.2354	0.3520	-0.1143	0.3552
Ohlone	2017	ESL	-0.3849	0.1973	-0.4678	-0.3805	-0.3709	1.1153	-0.5957	0.1637	-0.4810
Palo Verde	2017	ESL	0.9344	0.9178	0.8825	0.9115	1.2525	0.8903	0.9055	0.6406	0.9419
Palomar	2017	ESL	0.3587	-0.0994	0.6075	0.5752	0.0097	-0.0434	0.9622	0.6971	0.3172
Pasadena	2017	ESL	1.2499	0.9306	1.5424	1.1653	1.7524	1.2336	1.2304	1.3558	1.2424
Peralta	2017	ESL	-1.3461	-1.0393	-1.3488	-1.0428	-1.3639	-0.6293	-1.1809	0.1512	-1.2536
Rancho Santiago	2017	ESL	-0.1841	-1.3661	1.5152	-0.0405	-1.0222	0.1547	-0.2771	0.1989	-0.1959
Redwoods	2017	ESL	-0.0201	-0.6212	0.6119	-0.5255	0.4929	-0.1733	0.1293		
Rio Hondo	2017	ESL	0.7625	0.9101	0.3117	0.4428	1.0864	1.2835	0.0675	1.5957	0.5796
Riverside	2017	ESL	-1.0122	-0.8094	-1.0728	-0.8714	-1.1953	-0.7245	-0.9404	-0.5190	-1.0435
San Bernardino	2017	ESL	1.1542	1.1311	1.1323	0.9419	1.5911	1.7245	-0.5594	0.5872	1.2115
San Diego	2017	ESL	0.4546	0.4165	0.4875	0.4370	0.5818	0.3775	0.4837	0.3606	0.4612
San Francisco	2017	ESL	-0.2893	-0.2501	-0.3005	-0.3155	-0.0743	-0.3936	0.0133	-0.6622	-0.2391
San Joaquin Delta	2017	ESL	0.6972	0.7533	0.6528	0.6836	0.7170	0.6042	0.6486	0.9644	0.6666
San Jose-Evergreen	2017	ESL	-1.0353	-1.2418	-0.9526	-1.0285	-1.0701	-1.4152	-0.9125	-0.9357	-1.0379
San Luis Obispo	2017	ESL	0.9219	1.1536	0.3547	1.1626	0.1408	1.0918	0.7310	0.8896	0.9021
San Mateo	2017	ESL	0.5516	0.5698	0.5258	0.5350	0.6159	0.4226	0.8800	0.1180	0.6606
Santa Barbara	2017	ESL	-0.3208	-0.3946	0.9682	-0.3257	-0.2695	-0.2955	-0.3247	-0.1939	-0.3282
Santa Clarita	2017	ESL	-0.8641	-0.7534	-1.0073	-0.7979	-1.0024	-0.7024	-1.0203	-0.1121	-0.9101
Santa Monica	2017	ESL	0.4282	0.4391	0.4019	0.4567	0.0823	0.5272	-0.0529	0.6894	0.4035
Sequoias	2017	ESL	1.4686	0.5596	1.4475	1.5846	-0.0708	0.2656	1.6929	0.5976	1.4756
Shasta-Tehama-Trinity	2017	ESL	0.3760	0.7114	0.2532	0.5949	0.2921	0.4420	0.1889	0.0499	0.3824
Sierra	2017	ESL	0.7411	1.0998	0.5822	1.2190	0.4145	0.7546	0.0362	0.5897	0.7142
Siskiyou	2017	ESL	0.9839	0.5517	0.5929	0.6736	0.7824	0.6596	0.5868	-0.5371	0.9992
Solano	2017	ESL	0.5309	0.0933	0.6515	0.2635	1.3912	0.1683	1.3242	1.8024	0.3314
Sonoma	2017	ESL	1.1701	1.0375	1.2746	1.2371	0.9541	1.4736	0.4619	0.8225	1.2011
South Orange	2017	ESL	0.3041	0.7613	0.0411	0.1878	0.7526	0.4308	0.2868	0.0710	0.2914
Southwestern	2017	ESL	-1.0477	-1.2222	-0.5906	-1.0481	-0.7484	-0.4063	-0.7841	-1.0883	-1.0209
State Center	2017	ESL	0.7896	0.9744	0.5153	0.8568	0.5654	0.7140	-0.3924	0.8217	0.7666
Ventura	2017	ESL	-0.5331	-0.7345	-0.1156	-0.4642	-0.6914	-0.3080	-0.4683	-0.9849	-0.3733

Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Victor Valley	2017	ESL	0.9346	0.9007	0.9575	0.9354	0.9180	0.9301	0.9213	0.6025	0.9445
West Hills	2017	ESL	-0.5294	-0.5963	-0.3951	-0.5605	-0.3723	-0.4527	-0.7194	0.1098	-0.5324
West Kern	2017	ESL	-0.1273	-0.4386	0.7923	-0.3393	0.7959	0.3049	-0.5511		
West Valley-Mission	2017	ESL	0.8567	0.4520	0.9141	0.7655	1.0071	0.5320	1.3165	0.9420	0.7913
Yosemite	2017	ESL	-0.4100	-0.4275	-0.3864	-0.4556	-0.2602	-0.6118	-0.1605	-0.8117	-0.3627
Yuba	2017	ESL	1.4132	1.2809	1.0904	1.1525	1.2599	1.3966	0.5791	0.3139	1.5162
Allan Hancock	2017	Non-ESL	0.1107	-0.0621	0.1780	-0.0747	0.2180	0.1418	0.0695	0.0063	0.1159
Antelope Valley	2017	Non-ESL	-1.5173	-0.3701	-0.0284	-0.8074	0.3258	-1.4692	-1.0828	-0.1123	-1.2958
Barstow	2017	Non-ESL	0.9875	-1.2413	1.2335			0.9693	0.9140		
Butte	2017	Non-ESL	0.2057	0.2780	0.0888	0.2197	0.1304	0.2860	-0.5363	0.3508	-0.0907
Cabrillo	2017	Non-ESL	0.3794	0.1537	0.4017	0.3058	0.3743	0.2893	0.5198	-0.2486	0.4050
Cerritos	2017	Non-ESL	-1.2219	-0.0290	-0.7649	0.4298	-0.9294	-0.4538	-0.1574	-0.4068	-1.0731
Chabot-Las Positas	2017	Non-ESL	0.7476	0.1085	0.9713	0.0924	0.5665	0.9589	-0.5930	-0.7339	0.7991
Chaffey	2017	Non-ESL	-0.0013	-0.0769	0.5958	-0.0332	0.2289	-0.0965	0.1762	-0.4403	0.0134
Citrus	2017	Non-ESL	0.2482	-0.2136	0.8861	0.0139	0.4298	0.2360	-0.1131	0.4766	0.1319
Coast	2017	Non-ESL	0.2531	-0.2975	0.2946	-0.1302	0.4018	0.2993	0.1500	0.2253	0.2588
Compton	2017	Non-ESL	0.4938	0.6570	0.2840	0.4524	-0.9485	0.5041	0.3247	-0.5918	0.4289
Contra Costa	2017	Non-ESL	0.5094	0.0076	0.3765	0.7478	0.2643	0.1117	0.9295	-0.0633	0.4754
Copper Mountain	2017	Non-ESL	0.4706	-0.1217	0.4497	0.0015	0.4352	0.2453	0.6369		
Desert	2017	Non-ESL	-0.4417	-0.3892	-0.5670	-0.4353	0.3184	-0.3793	-0.2182	0.1594	-0.4157
El Camino	2017	Non-ESL	0.7677	0.5701	-0.0817	0.7055	0.2071	0.8365	-0.4586	0.4974	0.6694
Feather River	2017	Non-ESL	-0.9342								
Foothill-Deanza	2017	Non-ESL	0.8913	1.2394	0.7921	0.9521	0.7875	0.7240	1.0040	0.4816	1.0232
Gavilan	2017	Non-ESL	-0.6110	-0.6686	-0.5783	-0.8491	-0.3723	-0.5356	-0.6380	0.0632	-0.6385
Glendale	2017	Non-ESL	0.4938	0.7418	0.2858	0.5504	0.3497	0.5414	0.3045	0.1730	0.6073
Grossmont-Cuyamaca	2017	Non-ESL	0.7528	0.8078	0.6683	0.8498	0.6569	0.6735	0.4239	1.0165	0.6348
Hartnell	2017	Non-ESL	-0.2372	0.3667	-1.0003	-0.1546	-0.3030	0.6133	-1.0149	0.8636	-0.3318
Imperial	2017	Non-ESL	-0.4200	-0.5119	0.4079	-0.5242	0.3885	-0.3904	-0.5887	-0.5692	-0.3186
Kern	2017	Non-ESL	-0.3831	-0.3088	-0.4506	-0.3270	-0.2934	-0.3301	0.0963	0.3905	-0.3844
Lake Tahoe	2017	Non-ESL	-1.4853	-0.9167	-1.6810	-0.9545	-1.6260	-1.6831	-1.3287	-0.8771	-1.4984
Lassen	2017	Non-ESL	-1.2820	-0.6542	-0.9241	-1.0966	-0.3648	-1.1256	-0.2718		
Long Beach	2017	Non-ESL	0.5931	0.3688	-0.0322	0.4861	0.1586	0.4203	0.6747	0.5232	0.2673
Los Angeles	2017	Non-ESL	0.6058	1.3444	0.1815	0.7669	0.0908	0.7275	-0.4416	0.4661	0.6303
Los Rios	2017	Non-ESL	-0.0389	-0.3738	0.2509	-0.2154	0.1452	0.1116	-0.1733	-0.5166	-0.0078
Marin	2017	Non-ESL	0.1335	0.4218	0.0150	-0.4683	0.2492	0.0315	0.5941	0.2183	0.1154
Mendocino-Lake	2017	Non-ESL	1.2523	0.5732	0.7476	1.1363	0.6274	1.0972	1.2187	0.2853	1.2840
Merced	2017	Non-ESL	-0.0146	0.5015	-0.6850	-0.3864	0.9339	0.2390	-0.1735	-0.9669	0.0951
Mira Costa	2017	Non-ESL	0.4221	-0.0322	0.4367	0.1805	0.4152	0.7139	0.1810	0.3338	0.4346
Monterey	2017	Non-ESL	1.3167	1.0018	1.1033	2.0249	0.6002	1.1127	1.3083	0.4336	1.3336
Mt. San Antonio	2017	Non-ESL	-0.5675	-0.7231	-0.3781	-0.5762	-0.1330	-0.1392	-0.5902	0.7202	-0.6011
Mt. San Jacinto	2017	Non-ESL	0.2130	0.0905	0.3009	-0.0408	0.3884	0.3048	0.1391	0.4163	0.1389
Napa Valley	2017	Non-ESL	0.5584	0.7037	0.4972	0.7331	0.3709	0.3940	0.9409	0.2180	0.5777
North Orange	2017	Non-ESL	0.7663	1.0248	0.5849	1.4070	0.4314	0.5558	1.3228	0.8650	0.7567
Ohlone	2017	Non-ESL	0.1806	0.0969	0.1799	0.4025	-0.0133	0.7614	-0.1691	0.5456	0.1326
Palo Verde	2017	Non-ESL	-0.4351	-0.1600	-0.5179	-0.4730	-0.1714	0.0306	-0.6856	-0.3503	-0.4255
Palomar	2017	Non-ESL	0.3659	0.2089	0.2393	0.8282	0.2173	0.4499	0.2534	0.5472	0.3252
Pasadena	2017	Non-ESL	1.7551	0.8184	0.5717	0.0890	0.7480	-0.1088	0.8816	0.5667	1.0687
Peralta	2017	Non-ESL	0.1617	-0.9469	0.3285	0.1698	0.1307	0.4953	-0.2447	0.5265	0.1132
Rancho Santiago	2017	Non-ESL	0.7058	-0.7629	1.2704	1.0325	-0.7449	-0.4932	0.9545	0.2669	0.7170
Redwoods	2017	Non-ESL	1.2099	0.3435	0.9365	0.5474	0.8422	1.0378	1.0594		
Rio Hondo	2017	Non-ESL	-0.3561	0.1896	-0.4685	-0.5164	0.6616	-0.8492	-0.0890	0.6234	-1.1269

Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Riverside	2017	Non-ESL	0.1075	0.0372	1.1243	-0.0699	1.1000	-0.0228	0.3895	0.6175	0.0340
San Bernardino	2017	Non-ESL	-0.6001	-0.5303	-0.8960	-0.5162	-0.4499	-0.5557	-0.6846	-0.4223	-0.5738
San Diego	2017	Non-ESL	0.6807	1.2708	0.5114	0.8441	0.5218	0.7632	0.1828	-0.2942	0.7569
San Francisco	2017	Non-ESL	-1.2652	-0.8106	-1.2130	-1.3511	-0.8661	-0.6942	-1.3349	0.2230	-1.2730
San Joaquin Delta	2017	Non-ESL	-0.6896	-0.6669	0.1581	-0.5976	0.3610	-0.6735	-0.3450	0.2646	-0.6831
San Jose-Evergreen	2017	Non-ESL	-1.1092	-0.6877	-0.6189	-0.9035	0.1908	-0.5930	-0.3784	0.1143	-0.8213
San Luis Obispo	2017	Non-ESL	-1.1166	-1.0986	-1.1223	-0.8495	-0.3612	-0.9899	-0.4627	-0.4347	-0.8671
San Mateo	2017	Non-ESL	0.1471	0.1493	0.1460	0.1675	0.1213	0.0693	0.4024	0.5576	0.0787
Santa Barbara	2017	Non-ESL	0.0417	-0.0284	0.0610	-0.0693	0.1235	0.8094	-0.2907	-0.0081	0.0492
Santa Clarita	2017	Non-ESL	0.0524	-0.1078	0.2874	-0.0823	0.3852	0.9638	-0.5648	0.3886	0.0419
Santa Monica	2017	Non-ESL	0.7952	0.6337	0.4144	0.4494	0.6628	0.8373	0.2227	0.2956	1.5402
Sequoias	2017	Non-ESL	0.0674	-0.0636	0.2960	-0.0870	0.4089	0.0000	0.2530	-0.2958	0.0961
Shasta-Tehama-Trinity	2017	Non-ESL	0.2459	0.0625	0.2670	0.0170	0.2974	-0.8381	0.3438	0.0165	0.2472
Sierra	2017	Non-ESL	-1.4741	-1.7914	-1.0016	-0.8943	-0.1343	-1.0462	-0.3959	0.1125	-1.6480
Siskiyou	2017	Non-ESL	0.8481	0.7555	0.6792	0.5854	0.7872	-0.7595	0.8264	-0.2952	0.8639
Solano	2017	Non-ESL	-0.0736	-0.2919	0.0149	-0.8771	0.1852	-0.0039	-0.2584	0.1092	-0.0921
Sonoma	2017	Non-ESL	-0.3661	-1.0423	-0.0990	-0.5141	0.0806	-0.3601	-0.2078	-0.3619	-0.3340
South Orange	2017	Non-ESL	1.7748	1.4023	1.6875	0.2163	0.8507	1.6006	1.5494	1.0701	1.7787
Southwestern	2017	Non-ESL	-0.1136	0.3434	-0.4190	0.4896	-0.5886	0.9551	-0.7921	0.3548	-0.1627
State Center	2017	Non-ESL	-0.0463	-0.2142	0.7328	-0.2860	1.1024	-0.4641	0.6743	0.5247	-0.0924
Ventura	2017	Non-ESL	0.7675	0.0584	0.4708	0.0084	0.4387	0.7234	0.7284	0.4895	0.7688
Victor Valley	2017	Non-ESL	-0.4617	-0.4311	0.0426	-0.7111	0.2616	-0.3394	-1.0734	0.4026	-0.5434
West Hills	2017	Non-ESL	0.6271	0.3641	1.1654	0.4524	1.0350	0.4657	0.6729	-0.5692	0.6356
West Kern	2017	Non-ESL	0.9721	0.6314	1.3646	0.7564	1.3045	0.7604	1.1361		
West Valley-Mission	2017	Non-ESL	-0.0708	-0.5236	-0.0157	-0.3329	0.1539	0.0348	-0.2834	0.1570	-0.1042
Yosemite	2017	Non-ESL	1.6696	0.0270	0.4474	-0.0122	0.6549	1.3799	-0.9848	0.1800	1.4346
Yuba	2017	Non-ESL	1.1253	1.4091	0.7017	1.6231	0.6098	0.5927	1.6326	0.2350	1.1796
Allan Hancock	2018	ESL	1.0475	0.9707	0.4245	0.8749	1.2775	0.4244	1.2311	0.5130	1.0780
Antelope Valley	2018	ESL	-0.2047	-0.1440	-0.1912	-0.1800	-0.4001	-0.4754	0.4354	-0.4487	-0.1196
Barstow	2018	ESL	-1.1407	-1.1296	-1.0279	-1.4198	-0.8726	-0.9765	-1.1623		
Butte	2018	ESL	-0.5458	-1.3033	-0.1373	-1.5772	0.5477	0.2350	-0.6127	-0.8081	-0.4339
Cabrillo	2018	ESL	-0.8260	-0.6756	-0.9600	-0.7736	-0.8781	-0.8887	-0.6166	1.1234	-0.8835
Cerritos	2018	ESL	0.8130	0.8804	-0.1455	1.1355	-0.9510	0.2131	0.1400	-0.6174	1.0418
Chabot-Las Positas	2018	ESL	-1.1723	-1.0710	-1.0830	-1.2486	-0.7753	-1.1505	-0.2582	0.3660	-1.2462
Chaffey	2018	ESL	-0.4445	-0.4187	-0.5004	-0.4664	-0.3103	-0.4207	-0.7256	-0.8412	-0.3998
Citrus	2018	ESL	-0.7823	-0.7380	-0.8867	-0.7858	-0.7524	-0.6029	-0.7537	-0.7572	-0.7814
Coast	2018	ESL	-0.0594	0.5152	-0.1251	-0.1450	0.5267	1.1912	-0.2680	-0.5595	-0.0287
Compton	2018	ESL	0.1656	0.3441	-0.0413	-0.2573	-0.7831	0.1404	0.3000	0.1780	-0.2698
Contra Costa	2018	ESL	-0.9869	-0.6595	-0.9416	-0.8751	-0.9610	-0.8615	-0.7702	-0.0283	-0.9252
Copper Mountain	2018	ESL	0.9979	1.0720	0.4215	1.0086	0.4481	-0.3442	0.8522		
Desert	2018	ESL	0.4615	0.3776	0.7886	0.4295	0.7189	0.9230	0.0957	0.7948	0.4495
El Camino	2018	ESL	0.5367	0.5743	0.4434	0.5873	0.0189	0.4963	0.2545	0.0072	0.5490
Feather River	2018	ESL									
Foothill-Deanza	2018	ESL	-0.4347	-0.4180	-0.4406	-0.4411	-0.4140	-0.9247	-0.3358	-0.3361	-0.4483
Gavilan	2018	ESL	1.3622	1.2163	1.2683	1.2506	1.5129	0.7293	0.8951	0.4515	1.3780
Glendale	2018	ESL	0.4801	-0.0251	0.6272	-0.1590	0.7106	-0.4015	0.9936	1.0853	0.3881
Grossmont-Cuyamaca	2018	ESL	-0.5455	-0.7394	-0.3094	-0.4182	-0.3824	-0.6576	-0.0253	-0.5515	-0.3232
Hartnell	2018	ESL	-1.5305	-1.5959	-1.0427	-1.5574	-1.0462	-1.1706	-1.1400	0.3148	-1.5200
Imperial	2018	ESL	0.9206	0.9583	-0.5943	0.9546	-0.3800	0.6695	0.8857	0.8145	0.9447
Kern	2018	ESL	0.9087	0.8896	0.9308	0.8616	1.0924	0.8380	0.0299	0.5035	0.9565

Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Lake Tahoe	2018	ESL	-0.7234	-0.6808	-0.1518	-0.6925	-0.2540	-0.5873	-0.0149	-1.0366	-0.5153
Lassen	2018	ESL	-0.7286	-0.7737	-0.6103	-0.7949	-0.2046	-0.9174	-0.6802		-0.4811
Long Beach	2018	ESL	1.1709	1.1606	0.3367	1.3506	0.6947	-0.2859	0.7406	-0.5395	0.9533
Los Angeles	2018	ESL	0.1536	0.0316	0.5789	0.1260	0.4210	-0.1867	0.7965	-0.4542	0.2450
Los Rios	2018	ESL	0.6018	0.6894	0.5465	0.6187	0.5401	0.5038	1.9098	0.8569	0.5794
Marin	2018	ESL	-1.0882	-0.8707	-0.3054	-1.1391	0.1937	-1.0733	-0.3554	-1.0139	-1.0209
Mendocino-Lake	2018	ESL	-0.8956	-0.3681	-1.2303	-0.5727	-1.2520	-1.0173	-0.2967	0.9551	-0.9332
Merced	2018	ESL	1.2638	1.1171	1.2355	1.1899	0.6043	0.4563	0.9517	1.5341	1.2451
Mira Costa	2018	ESL	-0.8590	-0.5978	-1.0644	-0.6038	-1.5993	-0.9285	-0.3019	-0.7402	-0.8275
Monterey	2018	ESL	0.7690	1.1461	0.3825	1.1278	0.2210	0.3291	1.1550	-0.2141	0.8746
Mt. San Antonio	2018	ESL	0.8293	1.0033	0.5855	0.8307	0.7485	0.2387	0.8488	-0.4832	0.8452
Mt. San Jacinto	2018	ESL	0.7543	0.0407	0.7343	0.7577	-0.3457	1.3640	0.7042	1.0693	0.7323
Napa Valley	2018	ESL	-0.7107	-0.4511	-0.8566	-0.6141	-0.7444	-0.7983	-0.5856	-0.9682	-0.6535
North Orange	2018	ESL	-0.0579	-0.1772	0.0523	-0.0840	0.1870	0.3820	-0.1531	0.1714	-0.0689
Ohlone	2018	ESL	-0.2114	-0.1409	-0.2126	-0.1128	-0.6889	0.1835	-0.2553	0.0000	-0.2470
Palo Verde	2018	ESL	0.5962	0.7059	-0.1918	0.6271	0.0216	0.4194	0.6236	-0.0121	0.6227
Palomar	2018	ESL	0.6803	0.8285	0.5528	0.7546	0.5276	0.7343	0.5217	-0.1696	0.6669
Pasadena	2018	ESL	0.2102	-0.0516	0.5953	0.1785	0.5298	0.4952	0.0222	0.1442	0.2138
Peralta	2018	ESL	-0.8497	-0.9208	-0.6723	-1.0733	0.7686	-0.1554	-0.8596	0.5235	-0.9235
Rancho Santiago	2018	ESL	0.3623	0.6660	-0.3996	0.3311	0.4960	0.6813	0.2640	0.3121	0.3634
Redwoods	2018	ESL	0.4626	-0.1006	0.5907	-0.4262	0.9818	0.3867	0.0618	-0.1987	0.0633
Rio Hondo	2018	ESL	0.3268	0.2771	0.4025	-0.0600	0.6827	0.5045	0.0782	0.3989	0.2999
Riverside	2018	ESL	-0.6314	-0.6706	-0.4805	-0.7709	-0.0629	-0.5016	-0.5337	-1.5571	-0.5218
San Bernardino	2018	ESL	0.5788	0.4081	0.8088	0.5366	0.5016	0.5786	0.0941	1.2426	0.4767
San Diego	2018	ESL	0.1821	0.0445	0.3147	0.1549	0.4008	0.0613	0.2332	0.0084	0.1950
San Francisco	2018	ESL	0.5912	0.7704	0.5074	0.5123	1.0924	0.4248	0.9179	1.5592	0.4657
San Joaquin Delta	2018	ESL	-0.2639	-0.3327	-0.2119	-0.3629	0.1488	-0.2103	-0.3961	-0.6889	-0.2202
San Jose-Evergreen	2018	ESL	0.3584	0.5793	0.2788	0.3293	0.6328	-0.4162	0.4499	0.1615	0.3949
San Luis Obispo	2018	ESL	-0.3207	-0.3124	-0.2906	-0.3735	-0.1203	-0.0398	-0.4576	0.3148	-0.5088
San Mateo	2018	ESL	-0.1479	-0.2352	-0.0311	-0.2303	0.2606	-0.1881	-0.0359	-0.1782	-0.1386
Santa Barbara	2018	ESL	-0.4671	-0.4260	-0.5313	-0.4700	-0.4361	-0.5227	-0.4583	-0.6708	-0.4474
Santa Clarita	2018	ESL	-0.6557	-0.7534	-0.4972	-0.7108	-0.5209	-0.4437	-0.9244	-0.4858	-0.6575
Santa Monica	2018	ESL	0.1546	0.1057	0.2628	0.1410	0.3138	0.1369	0.2307	-0.0978	0.1774
Sequoias	2018	ESL	0.6574	0.7229	0.2139	0.5535	1.2036	1.2461	0.3376	1.5538	0.5915
Shasta-Tehama-Trinity	2018	ESL	0.5024	0.7315	0.4150	0.6538	0.4417	-0.1519	1.2669	-0.8479	0.5440
Sierra	2018	ESL	-0.6480	-0.3484	-0.7514	-0.5186	-0.6942	-0.5633	-0.5501	-0.4990	-0.6252
Siskiyou	2018	ESL	1.3526	1.3480	-0.2913	1.4307	-0.3316	-0.1652	1.3492	0.8056	1.3426
Solano	2018	ESL	-0.1483	-0.7467	0.0501	-0.3051	0.4931	-0.2569	0.5162	0.3277	-0.1964
Sonoma	2018	ESL	0.1852	0.1650	0.2005	0.2524	0.0155	0.1879	0.1159	0.2197	0.1675
South Orange	2018	ESL	0.5809	0.9040	0.3740	0.4518	1.0458	-0.1316	0.6171	-0.4379	0.6336
Southwestern	2018	ESL	-0.4798	-0.2761	-0.6023	-0.4441	-0.4174	-0.6402	0.2322	-0.9155	-0.3907
State Center	2018	ESL	0.1021	0.0938	0.1080	0.1279	0.0248	-0.0121	0.4331	0.7518	0.0596
Ventura	2018	ESL	0.3049	0.6121	-0.2820	0.4385	-0.6914	-1.1703	0.4849	1.0105	0.1582
Victor Valley	2018	ESL	1.1068	1.1361	0.9880	1.0795	1.2440	1.0982	1.1205	1.0799	1.1047
West Hills	2018	ESL	-0.8554	-0.8957	-0.7356	-0.8911	-0.6531	-0.7166	-1.2401	-1.2074	-0.8178
West Kern	2018	ESL	-0.2652	-0.2894	-0.1429	-0.3770	0.2653	0.0000	-0.5103		
West Valley-Mission	2018	ESL	-0.7804	0.1602	-1.0060	-0.8367	-0.6765	-0.3144	-1.6490	-0.8286	-0.7371
Yosemite	2018	ESL	0.9005	0.8687	0.9269	0.8898	0.9164	1.3811	0.3139	0.2934	0.9542
Yuba	2018	ESL	-1.4269	-1.1111	-1.2130	-1.6764	-0.5626	-0.8719	-1.5839	-1.0201	-1.4293
Allan Hancock	2018	Non-ESL	-0.4481	-0.5379	-0.4100	-0.6798	-0.2979	-0.4689	-0.4195	-0.4926	-0.4455
Antelope Valley	2018	Non-ESL	0.1366	0.2949	-0.2609	0.0534	-0.0075	-0.1329	1.5278	-0.4210	0.4269

Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Barstow	2018	Non-ESL	-0.5248	-1.3198	-0.0956	-1.0015	0.0447	-0.4937	-0.5273		
Butte	2018	Non-ESL	-0.1458	0.8074	-0.3185	0.3652	-0.1879	-0.2254	0.4749	-0.5262	-0.5120
Cabrillo	2018	Non-ESL	0.4669	1.2661	0.2436	1.1331	0.1524	0.1873	0.9509	-0.5167	0.5081
Cerritos	2018	Non-ESL	-0.0427	0.9844	-0.9911	1.2885	-1.1666	-0.4960	0.3967	-0.2816	0.0102
Chabot-Las Positas	2018	Non-ESL	0.9418	0.7380	0.5712	0.6839	-0.0914	0.7608	0.9883	0.1522	0.8179
Chaffey	2018	Non-ESL	0.8329	0.7322	1.2219	0.7112	0.4590	0.7565	0.9530	1.1548	0.8166
Citrus	2018	Non-ESL	1.3486	0.9004	1.1616	1.0482	0.1215	1.3715	-0.7449	0.6902	1.2045
Coast	2018	Non-ESL	0.0899	1.1076	-0.0620	0.3935	-0.0433	0.1460	-0.0184	0.1039	0.0866
Compton	2018	Non-ESL	0.4923	0.7600	0.1835	0.3760	0.8623	0.4942	0.3959	1.6844	0.3887
Contra Costa	2018	Non-ESL	-0.3501	0.2044	-0.3343	-0.6225	-0.1369	0.4532	-1.4484	0.5628	-0.3974
Copper Mountain	2018	Non-ESL	1.2710	0.9049	0.6447	1.2765	0.3242	1.4064	1.0990		
Desert	2018	Non-ESL	0.3083	0.3304	-0.2706	0.2768	0.0067	0.3780	-0.5578	-0.1266	0.2916
El Camino	2018	Non-ESL	1.1281	1.0035	-0.3331	0.8443	0.5157	0.8070	-0.1544	0.4298	1.0701
Feather River	2018	Non-ESL									
Foothill-Deanza	2018	Non-ESL	0.3817	0.6391	0.3130	0.3535	0.4239	-0.0629	0.8973	0.1232	0.4689
Gavilan	2018	Non-ESL	-0.6249	-0.7011	-0.5847	-0.8267	-0.4120	-0.7202	-0.5886	-0.4372	-0.6212
Glendale	2018	Non-ESL	-0.1396	-0.0455	-0.2127	-0.2073	0.0230	-0.1103	-0.2256	-0.0888	-0.1547
Grossmont-Cuyamaca	2018	Non-ESL	0.4296	1.1059	0.1792	0.8947	0.1361	0.3003	1.0784	0.7866	0.3096
Hartnell	2018	Non-ESL	1.1463	0.5573	1.3016	0.8958	1.3287	0.8885	1.0676	-0.2242	1.0867
Imperial	2018	Non-ESL	-0.0483	-0.0397	-0.0985	-0.1540	0.6171	-0.1260	0.6668	-0.5932	0.0339
Kern	2018	Non-ESL	0.1328	-0.3399	1.1268	-0.0122	1.2103	0.2010	-0.3748	-0.2157	0.1426
Lake Tahoe	2018	Non-ESL	0.3802	0.3598	0.3697	0.4808	-0.0998	-0.1460	0.5921	0.3070	0.3813
Lassen	2018	Non-ESL	0.0413	0.6259	-0.4546	0.4935	-0.6137	0.1479	-0.1661		-0.4647
Long Beach	2018	Non-ESL	-0.1859	0.2989	-0.8222	0.0431	-0.9147	-0.3908	0.1578	-0.1319	-0.0939
Los Angeles	2018	Non-ESL	0.3620	-0.0129	0.4826	0.4018	0.2219	-0.6493	1.9081	-0.2358	0.5292
Los Rios	2018	Non-ESL	-0.1654	0.1626	-0.1918	0.1794	-0.2387	-1.0488	1.0982	1.2528	-0.2447
Marin	2018	Non-ESL	-0.2438	0.6651	-0.3391	-0.4303	-0.1955	-0.3370	0.6528	-0.8049	-0.1336
Mendocino-Lake	2018	Non-ESL	0.3982	0.3070	0.1865	0.2000	0.2658	0.2962	0.5477	-0.0439	0.4163
Merced	2018	Non-ESL	0.8436	0.9919	0.3398	0.6025	-0.0897	-0.2041	1.3423	0.4002	0.8669
Mira Costa	2018	Non-ESL	0.3672	1.2358	0.0567	1.3547	0.0052	0.7672	0.0633	0.0318	0.4205
Monterey	2018	Non-ESL	-0.4727	0.0545	-0.4571	-0.6107	-0.2768	-0.9592	-0.4262	-0.4846	-0.4707
Mt. San Antonio	2018	Non-ESL	-0.5540	-0.4277	-0.6750	-0.5395	-0.3820	0.5254	-0.6739	0.1640	-0.5621
Mt. San Jacinto	2018	Non-ESL	0.7025	0.5696	0.0490	0.4864	-0.0543	0.6209	0.6690	-0.3714	0.6774
Napa Valley	2018	Non-ESL	0.0770	0.9913	-0.1220	0.3458	-0.1657	0.0654	0.1024	-0.3786	0.1059
North Orange	2018	Non-ESL	-0.3431	0.0451	-0.5036	-0.2239	-0.3684	-0.3511	-0.1276	-0.0608	-0.3639
Ohlone	2018	Non-ESL	-1.4890	-1.7511	-1.3323	-1.6088	-1.2138	-0.5488	-1.6835	0.4654	-1.5787
Palo Verde	2018	Non-ESL	0.3052	0.5187	0.0390	0.2887	0.1823	0.4230	-0.1760	0.1066	0.3016
Palomar	2018	Non-ESL	-0.1166	0.4152	-0.1914	0.0040	-0.1107	0.4483	-0.5419	-0.2749	-0.0858
Pasadena	2018	Non-ESL	0.3828	0.8056	-0.4542	-0.4594	0.6231	0.7765	-0.4672	0.1763	0.1691
Peralta	2018	Non-ESL	-0.3728	-0.2177	-0.3857	-0.4018	-0.2638	-0.1610	-0.5802	0.3412	-0.4516
Rancho Santiago	2018	Non-ESL	-0.1502	0.5514	-0.5229	-0.1680	0.0142	0.4932	-0.3134	-0.2169	-0.1421
Redwoods	2018	Non-ESL	-0.5289	0.4597	-0.6639	0.1352	-0.5526	-0.6697	-0.3181	-0.6334	-0.5130
Rio Hondo	2018	Non-ESL	0.7077	0.9887	0.3541	0.9440	-0.0103	0.5975	0.6792	0.3781	0.3556
Riverside	2018	Non-ESL	0.5932	0.5922	0.0495	0.4637	0.6837	0.5572	0.6557	0.0447	0.5380
San Bernardino	2018	Non-ESL	0.7261	0.5930	1.3736	0.6145	0.6322	0.8060	0.5540	-0.5699	0.7243
San Diego	2018	Non-ESL	0.3326	0.8034	0.2115	0.4470	0.2240	0.3125	0.4046	-0.2964	0.3857
San Francisco	2018	Non-ESL	0.4768	0.5042	0.3965	0.1841	0.8192	-0.1039	0.7983	-0.7125	0.6320
San Joaquin Delta	2018	Non-ESL	-0.8487	-0.0631	-0.9638	-0.3799	-0.2083	-1.1341	-0.0263	-0.5610	-0.6263
San Jose-Evergreen	2018	Non-ESL	1.2689	1.3564	0.1674	0.9259	0.0026	-0.1229	1.0217	-0.3310	1.0590
San Luis Obispo	2018	Non-ESL	0.0779	-0.0398	0.2597	-0.1888	0.7288	-0.7592	0.4095	-0.4117	0.1922
San Mateo	2018	Non-ESL	-0.1419	-0.3183	-0.0870	-0.1048	-0.1882	-0.3413	0.6211	0.5204	-0.2408

Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Santa Barbara	2018	Non-ESL	-0.3449	-0.3726	-0.3369	-0.4982	-0.2247	0.1613	-0.4253	-0.2143	-0.3639
Santa Clarita	2018	Non-ESL	0.2952	0.3165	0.1672	0.3734	-0.4043	0.5703	0.0299	0.6005	0.2784
Santa Monica	2018	Non-ESL	-0.1344	0.3260	-0.2124	-1.8058	0.2348	0.5915	-0.3525	-0.1016	-0.1563
Sequoias	2018	Non-ESL	0.4109	0.5592	-0.8073	0.4127	-0.4023	0.4962	0.1653	0.0691	0.3533
Shasta-Tehama-Trinity	2018	Non-ESL	1.5954	1.8976	1.3819	1.9104	1.2196	1.4048	1.4618	0.4114	1.6007
Sierra	2018	Non-ESL	0.8119	0.4845	0.7430	0.3494	0.1852	0.0419	1.0117	-0.2249	0.9717
Siskiyou	2018	Non-ESL	0.2670	0.3976	0.1789	-0.3087	0.9357	0.4711	-0.0663	-0.2952	0.2786
Solano	2018	Non-ESL	-0.5438	-0.0112	-0.4162	-1.1795	-0.2351	-0.4835	-0.6312	-0.4304	-0.5544
Sonoma	2018	Non-ESL	0.6394	0.6303	0.4305	0.5936	0.0288	-0.0394	1.2117	-0.3096	0.7896
South Orange	2018	Non-ESL	0.4410	0.8441	0.2623	-0.0436	0.2820	0.7166	0.0703	1.0515	0.2294
Southwestern	2018	Non-ESL	0.4197	0.4504	-0.4415	0.3347	-0.3037	-0.6789	0.6444	-1.2332	0.5888
State Center	2018	Non-ESL	0.9086	0.7346	0.6155	0.7282	0.8237	0.3199	1.4558	-0.2482	0.8616
Ventura	2018	Non-ESL	0.6041	0.6418	0.0435	0.1959	0.2485	0.2294	1.1469	-0.2847	0.7977
Victor Valley	2018	Non-ESL	-0.7854	0.0655	-0.5091	-0.4305	-0.2794	-0.8161	0.5426	-0.2430	-0.8069
West Hills	2018	Non-ESL	0.5049	0.6398	-0.2500	0.5394	0.0327	0.5081	0.3481	0.9487	0.4793
West Kern	2018	Non-ESL	0.8859	0.8683	0.7922	0.8705	0.7920	1.0082	0.7733		
West Valley-Mission	2018	Non-ESL	-0.5995	-0.6202	-0.5756	-0.9047	-0.2736	-0.5829	-0.5823	0.1525	-0.7029
Yosemite	2018	Non-ESL	-1.3369	0.1959	-0.5754	-0.1813	-0.3346	0.1937	-0.6869	-0.2980	-1.0871
Yuba	2018	Non-ESL	-0.2248	0.3673	-0.3776	-0.2723	-0.1512	-0.0708	-0.3837	-0.0336	-0.2367
Allan Hancock	2019	ESL	-0.1366	-0.1740	0.6271	-0.2400	0.6576	-0.7390	0.2719	-0.7696	-0.0722
Antelope Valley	2019	ESL	-0.1982	0.2773	-0.5948	-0.1947	-0.2244	-0.5836	0.5973	-0.9332	0.0353
Barstow	2019	ESL	-0.4221	-0.2084	-0.5828	-0.6681	-0.3878	-0.6358	-0.1835		
Butte	2019	ESL	1.3495	-0.6892	1.5885	1.3397	0.8552	0.2828	1.0903	-1.2122	1.2237
Cabrillo	2019	ESL	1.8746	1.7604	1.9051	1.7774	1.9507	1.9722	1.4529	0.6631	1.8356
Cerritos	2019	ESL	-1.2460	-1.0502	-0.2520	-1.2135	0.5250	-0.8231	0.3733	-1.3413	-0.8334
Chabot-Las Positas	2019	ESL	-0.5587	-0.6585	-0.3881	-0.4102	-1.0925	-0.8927	0.7356	0.7622	-0.9374
Chaffey	2019	ESL	-1.0256	-0.9986	-1.0683	-1.0228	-1.0287	-1.0192	-1.0294	-1.2450	-0.9942
Citrus	2019	ESL	-0.9013	-0.9421	-0.7866	-0.9144	-0.8343	-0.8611	0.2471	-0.4509	-0.9175
Coast	2019	ESL	0.5318	1.0988	0.4491	0.4367	0.7946	-0.0465	0.5018	0.1119	0.5534
Compton	2019	ESL	-0.6648	-0.7050	-0.6059	-1.5692	-0.7831	-0.5853	-1.0772	-1.3795	-1.5585
Contra Costa	2019	ESL	-0.7198	-0.3414	-0.7905	-0.7608	-0.3757	-0.7962	-0.4459	0.4958	-0.9005
Copper Mountain	2019	ESL	-0.4773	0.4359	-0.9237	-0.2017	-0.4481	1.6553	-1.5646		
Desert	2019	ESL	-0.0475	-0.0140	-0.1811	0.0275	-0.8776	-0.0018	-0.0766	-0.3791	-0.0365
El Camino	2019	ESL	-0.4774	-0.2550	-0.8681	-0.4590	-0.6319	-0.4340	-0.2925	-0.3378	-0.4675
Feather River	2019	ESL	-0.6716								
Foothill-Deanza	2019	ESL	1.5882	1.7113	1.5230	1.6108	1.5149	1.5421	1.5838	1.6356	1.5806
Gavilan	2019	ESL	0.4351	0.0461	1.1198	0.3372	0.7867	-1.1444	0.8690	0.8010	0.3941
Glendale	2019	ESL	0.0484	-0.0114	0.0662	-0.7041	0.3735	-0.0463	0.1062	0.0860	0.0418
Grossmont-Cuyamaca	2019	ESL	0.8617	1.3660	0.3867	1.2069	0.1228	-0.1620	1.4046	-0.2969	1.3362
Hartnell	2019	ESL	-0.1110	0.0808	-0.6488	-0.0457	-0.8853	-0.9620	0.7797	1.4378	-0.2775
Imperial	2019	ESL	0.2733	0.3434	-1.2199	0.2719	0.1900	0.4112	-0.4029	-0.0339	0.3930
Kern	2019	ESL	0.0145	0.1614	-0.3030	0.1059	-0.4003	-0.0986	0.8313	-0.1532	0.0369
Lake Tahoe	2019	ESL	0.5325	-0.3237	0.7590	0.0239	0.6954	-0.2795	0.7024	-0.0864	0.5658
Lassen	2019	ESL	-0.7286	-0.7240	-0.7350	-0.7092	-0.7843	-0.3957	-0.7861		-0.4811
Long Beach	2019	ESL	0.4018	0.2602	0.2928	0.0546	1.0442	-0.6003	0.5806	-0.4647	0.4694
Los Angeles	2019	ESL	-0.9195	-0.7682	-1.3810	-0.9310	0.9771	-0.9769	0.5097	-1.0705	-0.8819
Los Rios	2019	ESL	-0.7789	-0.7831	-0.7697	-0.8177	-0.6428	-0.7675	-0.3691	-0.4039	-0.8037
Marin	2019	ESL	-0.7162	0.2113	-0.7881	-0.4158	-1.0681	-0.8771	-0.0148	-1.1794	-0.5353
Mendocino-Lake	2019	ESL	-0.0745	0.3426	-0.4338	0.2479	-0.5679	-0.2218	0.3404	0.0000	-0.0735
Merced	2019	ESL	1.1711	1.2558	0.0404	1.2134	-0.6930	-0.3600	1.2208	0.9677	1.1737



Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Mira Costa	2019	ESL	-0.4712	-0.4606	-0.3443	-0.3728	-0.7192	-0.8651	0.1389	-0.9060	-0.3757
Monterey	2019	ESL	0.0119	0.2980	-0.2348	0.0373	-0.0238	0.0562	-0.0380	0.0268	0.0098
Mt. San Antonio	2019	ESL	1.0954	0.8915	1.2957	1.1048	0.7437	1.0915	1.0461	2.0360	1.0704
Mt. San Jacinto	2019	ESL	0.3172	-0.8743	0.5515	0.2349	1.7283	-0.0496	0.3248	-0.1213	0.3383
Napa Valley	2019	ESL	0.6522	0.2176	0.9234	1.0337	-0.2863	1.4346	0.1632	-0.3227	0.7682
North Orange	2019	ESL	-0.6978	-0.6386	-0.7490	-0.6912	-0.7527	-0.4683	-0.7403	-0.5047	-0.7058
Ohlone	2019	ESL	0.0690	0.4510	-0.0025	-0.0656	0.7419	-0.2400	0.1135	-0.3275	0.1430
Palo Verde	2019	ESL	-1.0160	-1.1162	-0.2174	-1.0342	-0.6262	-0.0809	-1.2586	-0.3021	-1.0445
Palomar	2019	ESL	1.0036	1.1245	0.8730	0.9394	1.0413	1.1457	0.6700	-0.8101	1.0083
Pasadena	2019	ESL	-0.8471	-1.0074	-0.4374	-0.8643	-0.1850	-1.1383	-0.6398	-0.5481	-0.8634
Peralta	2019	ESL	-0.3369	0.1012	-0.5821	-0.4826	0.5287	-0.8051	0.0102	0.5139	-0.4608
Rancho Santiago	2019	ESL	-1.0457	-0.3081	-0.9077	-1.1425	-0.3060	-1.1659	-0.9903	-1.2470	-1.0379
Redwoods	2019	ESL	1.2672	0.0035	1.3334	0.3682	1.1773	1.4867	-0.1911	-0.9934	1.2164
Rio Hondo	2019	ESL	0.3603	0.2313	0.6204	0.1051	0.0954	0.0608	0.6221	-0.0587	0.4207
Riverside	2019	ESL	0.8919	0.5434	1.1386	0.5740	1.6357	0.4856	0.9912	0.5190	0.9131
San Bernardino	2019	ESL	0.6394	0.9010	0.2115	0.9194	-0.9512	-0.1702	1.1634	0.7510	0.6123
San Diego	2019	ESL	-0.3105	-0.2361	-0.3802	-0.2702	-0.6322	-0.5225	-0.2143	-0.2281	-0.3164
San Francisco	2019	ESL	-0.5117	-0.1602	-0.6479	-0.5497	-0.1910	-0.6309	-0.1391	-0.0337	-0.5506
San Joaquin Delta	2019	ESL	-1.2543	-1.2887	-1.2236	-1.2806	-1.0850	-1.0919	-1.1275	-0.7607	-1.2958
San Jose-Evergreen	2019	ESL	1.0233	1.1115	0.9809	1.0059	1.1621	0.9418	0.9694	0.8034	1.0524
San Luis Obispo	2019	ESL	0.0501	-0.3197	0.7391	-0.3868	1.0472	-0.2410	0.2194	-0.3422	0.1710
San Mateo	2019	ESL	-1.0730	-1.0614	-1.0851	-1.0681	-1.0631	-1.0113	-1.2056	-0.8791	-1.1142
Santa Barbara	2019	ESL	-0.4654	-0.4226	-0.5535	-0.4653	-0.4655	-0.5038	-0.4593	-0.7173	-0.4419
Santa Clarita	2019	ESL	-0.2880	-0.3100	-0.2492	-0.3498	-0.1432	-0.3647	-0.1205	-0.8596	-0.2356
Santa Monica	2019	ESL	-1.0766	-1.0875	-1.0473	-1.0725	-1.1059	-1.1297	-0.7822	-1.1856	-1.0646
Sequoias	2019	ESL	-0.3162	0.3236	-0.7196	-0.4107	0.5664	0.4290	-0.5457	-0.3586	-0.3054
Shasta-Tehama-Trinity	2019	ESL	-1.0681	-1.1811	-1.0128	-1.0134	-1.0757	-0.8840	-1.0446	-0.3990	-1.0773
Sierra	2019	ESL	-1.3051	-1.4961	-1.1996	-1.4379	-1.1598	-1.1172	-1.2015	0.1361	-1.3086
Siskiyou	2019	ESL	0.0737	0.6675	-1.1308	0.4887	-1.1635	-1.1562	0.6541	1.0742	0.0524
Solano	2019	ESL	-0.8861	-0.3733	-1.0174	-0.8460	-0.7749	-0.8629	0.2469	-0.3605	-0.8837
Sonoma	2019	ESL	-1.0973	-0.8216	-1.4375	-1.0017	-1.2741	-0.6380	-1.1358	-0.0971	-1.2965
South Orange	2019	ESL	0.7077	0.3975	0.8335	0.7330	0.5051	0.4416	0.7081	-0.0396	0.7056
Southwestern	2019	ESL	0.6954	0.8651	0.3290	0.8332	0.2108	-0.3479	1.3246	0.2177	0.7707
State Center	2019	ESL	-0.8234	-0.8409	-0.7622	-0.8309	-0.7664	-0.7811	0.5783	0.5070	-0.8830
Ventura	2019	ESL	1.2757	1.2548	1.1879	1.0660	1.9359	-0.0616	1.2495	-0.9849	1.3066
Victor Valley	2019	ESL	0.5825	0.6508	0.4089	0.6265	0.3314	0.6102	0.2988	0.7389	0.5750
West Hills	2019	ESL	-0.3419	-0.1639	-0.5722	-0.2446	-0.6531	-0.6104	1.1953	1.4270	-0.3854
West Kern	2019	ESL	-0.7424	-0.7778	-0.4935	-0.6912	-0.7959	-0.8538	-0.5715		
West Valley-Mission	2019	ESL	-0.8567	-1.1614	-0.6990	-0.8434	-0.8726	-1.0232	-0.0180	-0.6293	-0.9647
Yosemite	2019	ESL	1.3241	1.4262	1.1972	1.3256	1.2938	1.0388	1.4825	1.4735	1.2928
Yuba	2019	ESL	-0.1042	1.1923	-0.8723	0.4939	-0.8940	-0.6239	0.9243	-0.0785	-0.1038
Allan Hancock	2019	Non-ESL	-0.9640	-0.9452	-0.9654	-1.0277	-0.8995	-0.9855	-0.9331	-0.7496	-0.9741
Antelope Valley	2019	Non-ESL	0.2515	0.8878	-0.8277	0.6708	-0.6644	0.2080	0.3708	-0.6729	0.7125
Barstow	2019	Non-ESL	-0.4958	0.5127	-0.5880	0.4146	-0.5166	-0.4091	-0.6093		
Butte	2019	Non-ESL	-0.8075	0.6452	-0.7904	0.0697	-0.6829	-0.7367	0.4878	-1.4033	-1.3139
Cabrillo	2019	Non-ESL	-1.4760	-1.8061	-1.2813	-1.8185	-1.1997	-1.4183	-1.4812	-1.0529	-1.4811
Cerritos	2019	Non-ESL	0.0258	0.4629	-0.4363	-0.3974	0.3655	-1.1513	0.9756	-1.0327	0.2085
Chabot-Las Positas	2019	Non-ESL	-0.0327	0.8015	-0.9169	0.5734	-0.8440	0.0233	-0.2270	-0.3133	0.0256
Chaffey	2019	Non-ESL	0.8091	0.8203	0.3281	0.7605	-0.0515	0.8528	0.7063	1.3376	0.7861
Citrus	2019	Non-ESL	0.5453	1.0877	-0.8131	0.7871	-0.7776	0.3233	0.0372	-0.4674	0.6788
Coast	2019	Non-ESL	-0.5852	1.0127	-0.7257	-0.3783	-0.6417	-0.7468	-0.2478	-0.6085	-0.5788



Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Compton	2019	Non-ESL	0.0647	0.3640	-0.2267	-1.5272	1.0347	0.0704	0.0047	0.0911	-1.5043
Contra Costa	2019	Non-ESL	-0.5803	0.9317	-0.7678	-0.0183	-0.6452	-0.8558	0.0540	1.6252	-0.7528
Copper Mountain	2019	Non-ESL	-0.8529	0.6197	-0.9995	0.2896	-0.9843	-0.5783	-1.0426		
Desert	2019	Non-ESL	0.6046	0.7001	-1.1240	0.6475	-0.8726	0.7965	-1.4407	-0.8465	0.6295
El Camino	2019	Non-ESL	0.3004	1.0438	-1.0876	0.6379	-0.3165	-0.4293	0.7515	-1.0568	0.6209
Feather River	2019	Non-ESL	1.1253								
Foothill-Deanza	2019	Non-ESL	-1.0317	-0.9789	-1.0276	-1.1140	-0.8926	-1.0352	-0.9152	-0.8751	-1.0674
Gavilan	2019	Non-ESL	-0.0823	0.1883	-0.1868	0.1572	-0.2534	-0.1083	-0.0725	-0.8467	-0.0318
Glendale	2019	Non-ESL	-0.9895	-0.9439	-1.0083	-1.0792	-0.7566	-0.8547	-1.3608	-0.7308	-1.0537
Grossmont-Cuyamaca	2019	Non-ESL	-0.5683	0.1628	-0.7467	-0.3709	-0.6535	-0.5293	-0.1122	-0.3228	-0.5926
Hartnell	2019	Non-ESL	0.9025	0.7888	0.4939	0.8992	0.8696	0.5509	0.9885	-0.6920	0.9229
Imperial	2019	Non-ESL	0.0267	0.1816	-1.1534	-0.0530	0.5028	0.1458	-1.0573	-0.9887	0.1573
Kern	2019	Non-ESL	0.9922	0.9091	0.9300	0.9048	0.2486	0.9193	-0.5031	-0.7215	0.9617
Lake Tahoe	2019	Non-ESL	1.3592	1.5890	1.1753	1.1964	0.7831	1.2329	1.3501	1.2938	1.3575
Lassen	2019	Non-ESL	1.3487	1.5031	0.3196	1.5603	-0.1713	1.5919	-0.3523		1.0428
Long Beach	2019	Non-ESL	0.2110	0.5994	-0.9517	0.4489	-1.1651	-0.1749	0.7024	-0.8551	0.4225
Los Angeles	2019	Non-ESL	-0.8518	-0.9491	-0.6866	-0.8804	-0.7146	-0.8430	0.2606	-0.6714	-0.8815
Los Rios	2019	Non-ESL	0.2680	0.9689	-0.5746	0.9806	-0.6072	-0.6188	1.0129	1.1995	0.1981
Marin	2019	Non-ESL	-0.9916	0.8963	-0.9866	-1.3037	-0.8855	-0.7906	-0.9531	-1.0710	-0.9623
Mendocino-Lake	2019	Non-ESL	-0.2866	0.4221	-0.3981	0.2161	-0.3392	-0.5992	0.7805	-0.8999	-0.2443
Merced	2019	Non-ESL	0.6820	-0.1984	1.5847	0.7808	-0.8009	0.2891	0.7953	1.2415	0.5956
Mira Costa	2019	Non-ESL	-0.6888	0.7037	-0.8791	0.0797	-0.7889	-0.5293	-0.7052	-0.7260	-0.6795
Monterey	2019	Non-ESL	-0.7665	0.9403	-0.8667	-0.2437	-0.8429	0.5021	-0.8510	-1.0050	-0.7579
Mt. San Antonio	2019	Non-ESL	-0.8104	-0.5834	-1.0341	-0.7431	-1.0665	-1.4000	-0.6651	-1.6679	-0.7351
Mt. San Jacinto	2019	Non-ESL	1.0540	0.9727	-0.3373	0.9059	-0.4601	0.8228	1.0632	-0.9310	1.0634
Napa Valley	2019	Non-ESL	-1.2017	-1.4983	-1.0733	-1.5165	-0.8523	-1.1832	-1.1982	-0.7917	-1.2225
North Orange	2019	Non-ESL	-0.8687	-1.1142	-0.6859	-0.7302	-0.8624	-1.0875	0.5778	-0.7088	-0.8788
Ohlone	2019	Non-ESL	-0.7495	0.2357	-0.8475	-0.8389	-0.5884	-1.2683	-0.3143	-1.0176	-0.6720
Palo Verde	2019	Non-ESL	-0.2340	0.1678	-0.4810	-0.1175	-0.2893	-0.0540	-0.2645	-0.9899	-0.2107
Palomar	2019	Non-ESL	-0.7515	0.7130	-0.7644	0.0474	-0.7166	-0.3663	-0.9552	-0.8708	-0.7128
Pasadena	2019	Non-ESL	-0.4974	0.3768	-0.7239	-0.6254	0.3646	0.9148	-0.9783	-0.7098	0.3646
Peralta	2019	Non-ESL	-0.8127	-0.3374	-0.8620	-0.8309	-0.7379	-0.6664	-0.8967	-0.7141	-0.8058
Rancho Santiago	2019	Non-ESL	1.0398	1.7934	-0.0224	1.0129	0.3206	1.7451	0.7040	-0.0894	1.0877
Redwoods	2019	Non-ESL	-0.3731	0.9943	-0.7479	0.3447	-0.5126	-0.6149	-0.1288	-0.9583	-0.3128
Rio Hondo	2019	Non-ESL	0.7890	1.3089	0.3076	1.1001	-0.1708	1.5329	0.3580	-0.6853	1.6862
Riverside	2019	Non-ESL	0.8727	0.9603	-1.3419	0.8365	0.0278	0.8508	0.8971	-0.8326	0.8852
San Bernardino	2019	Non-ESL	0.8920	0.8581	0.9149	0.7900	0.4710	0.8651	0.9371	-0.7914	0.8923
San Diego	2019	Non-ESL	-0.2807	-0.1027	-0.2998	-0.2384	-0.3137	-0.3284	-0.0043	-0.7117	-0.2255
San Francisco	2019	Non-ESL	1.3988	1.6022	1.1258	1.5909	0.8104	0.8857	1.3805	-0.6632	1.5084
San Joaquin Delta	2019	Non-ESL	-0.3441	0.4484	-1.1155	0.1352	-0.6152	-0.8270	0.4684	-0.8849	-0.0950
San Jose-Evergreen	2019	Non-ESL	1.0514	0.1866	1.0281	1.4960	-1.4936	-0.3360	1.0187	-0.7192	1.1428
San Luis Obispo	2019	Non-ESL	0.9051	0.8057	1.0419	0.5866	0.5822	-0.7038	1.0610	-0.5425	0.9695
San Mateo	2019	Non-ESL	-0.6544	-0.7076	-0.6365	-0.6700	-0.6345	-0.7162	-0.2904	-0.2016	-0.7053
Santa Barbara	2019	Non-ESL	-0.6623	-0.7206	-0.6457	-0.7864	-0.5584	-0.4103	-0.5195	-0.8055	-0.6385
Santa Clarita	2019	Non-ESL	1.5418	1.1118	1.7233	1.1868	0.2362	0.5124	1.7866	0.4416	1.5260
Santa Monica	2019	Non-ESL	-0.5737	0.8370	-0.7245	-0.1879	-0.5056	0.7626	-0.7477	-0.6574	-0.2183
Sequoias	2019	Non-ESL	0.7123	0.7592	-0.8198	0.6706	-0.5597	0.6321	0.9200	-0.9094	0.7403
Shasta-Tehama-Trinity	2019	Non-ESL	-0.9272	-0.3699	-0.9753	-0.5822	-0.9171	0.5770	-1.0062	-0.3785	-0.9289
Sierra	2019	Non-ESL	0.6124	0.9497	0.3377	0.7385	-0.2293	-0.2985	1.2536	-0.6926	0.9386
Siskiyou	2019	Non-ESL	-1.5705	-1.0338	-1.3376	-1.8129	-0.4406	1.1760	-1.4245	-0.2952	-1.5722

Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Solano	2019	Non-ESL	-0.6600	0.8082	-0.7068	-0.6391	-0.5251	-0.7070	-0.4284	-0.7581	-0.6489
Sonoma	2019	Non-ESL	0.0068	1.1235	-0.2373	0.9670	-0.5355	-0.5572	0.7201	-0.6348	0.1467
South Orange	2019	Non-ESL	-0.6405	0.0356	-0.7807	0.1359	-0.4624	-0.8598	-0.2809	0.4127	-0.8581
Southwestern	2019	Non-ESL	1.2462	0.3167	-0.1298	0.2204	-0.0077	-1.0457	1.1365	-1.1111	1.3430
State Center	2019	Non-ESL	0.8386	0.8126	-0.0140	0.8329	0.0202	0.9589	0.2342	-0.7520	0.8447
Ventura	2019	Non-ESL	-0.4063	0.7820	-0.6956	0.2524	-0.3637	-0.5602	-0.0867	-0.5979	-0.3097
Victor Valley	2019	Non-ESL	-1.3586	0.3127	-1.0259	-0.3040	-0.8931	-1.4102	0.9229	-1.1593	-1.3024
West Hills	2019	Non-ESL	1.2415	1.2431	0.5170	1.2809	0.2887	1.0167	1.1944	-0.5218	1.2444
West Kern	2019	Non-ESL	0.7234	0.9003	0.3520	0.8454	0.3521	0.7496	0.6927		
West Valley-Mission	2019	Non-ESL	-0.4744	0.3286	-0.5506	-0.2133	-0.6305	-0.6630	-0.0428	-0.9625	-0.3914
Yosemite	2019	Non-ESL	0.2469	0.7484	-0.6770	0.5577	-0.4587	-0.7135	0.8969	-0.9794	0.6153
Yuba	2019	Non-ESL	-0.7154	0.1312	-0.8219	-0.5765	-0.6454	-0.6380	-0.7224	-0.8896	-0.6904
Allan Hancock	2020	ESL	-1.7674	-1.7834	1.3795	-1.7897	-0.1033	-1.6974	-1.4563	-1.5391	-1.7534
Antelope Valley	2020	ESL	-0.9235	-0.3169	-1.1896	-0.9221	-0.9269	-1.0599	0.4200	-0.9063	-0.8782
Barstow	2020	ESL	0.7073	1.1076	0.2437	0.7934	-0.7110	0.1135	1.1623		
Butte	2020	ESL	-0.0430	-0.1979	0.0196	0.3600	-0.3747	-2.0112	0.9494		
Cabrillo	2020	ESL	0.3565	0.6539	-0.0224	0.6106	-0.1547	-0.3011	1.0879	-1.3755	0.4283
Cerritos	2020	ESL	-0.3201	-0.1117	-0.3158	-0.6542	0.7410	-1.5890	1.7265	0.6174	-0.5351
Chabot-Las Positas	2020	ESL	0.2739	-0.4848	0.8890	0.3471	-0.0352	-0.1660	1.1448	0.8118	-0.2332
Chaffey	2020	ESL	-1.1422	-1.1811	-1.0081	-1.1286	-1.2084	-1.1516	-0.9281	-0.5636	-1.1924
Citrus	2020	ESL	-0.9678	-0.9393	-1.0298	-0.9427	-1.0346	-1.1358	1.6803	-1.3697	-0.9489
Coast	2020	ESL	1.6418	0.5152	1.7244	1.7726	-0.2614	-1.3873	1.7713	1.9024	1.6142
Compton	2020	ESL	-1.6745	-1.7091	-1.6025			-1.7263	-1.2408		
Contra Costa	2020	ESL	0.8761	1.7453	-0.0252	1.2970	-0.5275	0.6265	0.7792	1.7566	0.0650
Copper Mountain	2020	ESL	-0.3905	0.7186	-1.0314	0.9413	-1.2882	0.6720	-0.7505		
Desert	2020	ESL	-1.4972	-1.5196	-1.3727	-1.4658	-1.5218	-1.7070	-1.2328	-1.6997	-1.4873
El Camino	2020	ESL	-1.8047	-1.9014	-1.5463	-1.8171	-1.5939	-1.8554	0.7788	-0.5965	-1.8101
Feather River	2020	ESL	-0.6455								
Foothill-Deanza	2020	ESL	0.9227	0.7262	1.0108	0.8914	1.0158	0.9527	0.9090	0.8290	0.9352
Gavilan	2020	ESL	-0.0374	-0.0883	0.0798	0.1883	-1.1278	-1.4155	0.5663	-1.0340	0.0336
Glendale	2020	ESL	-1.7448	-1.9063	-1.6053	-1.2546	-1.7788	-1.4860	-0.5675	-0.5302	-1.8026
Grossmont-Cuyamaca	2020	ESL	0.2804	1.0276	-0.1740	1.0874	-0.5718	-0.3145	0.7547	-0.2404	0.5365
Hartnell	2020	ESL	0.8727	0.5496	1.6452	0.8707	0.8048	-0.0711	1.3761	0.6721	0.7660
Imperial	2020	ESL	-1.8589	-1.8264	-0.7195	-1.8624	-0.9500	-2.0195	0.3041	-1.8501	-1.8235
Kern	2020	ESL	-1.9236	-1.9322	-1.8643	-1.9416	-1.7781	-1.9411	1.1782	-1.9630	-1.9041
Lake Tahoe	2020	ESL	1.1421	-0.6362	1.5822	-0.0955	1.6449	-0.6488	1.5542	-0.6911	1.3245
Lassen	2020	ESL	-0.7865	-0.7426	-0.8908	-0.7344	-1.0571	-0.6305	-0.8073		-0.5373
Long Beach	2020	ESL	1.0677	0.6135	0.8784	1.0641	0.9636	-0.8259	1.0428	-0.9348	1.0947
Los Angeles	2020	ESL	-1.4900	-1.5664	-1.0791	-1.4846	1.1085	-1.3402	0.2143	-1.1334	-1.5219
Los Rios	2020	ESL	-1.6886	-1.6695	-1.6850	-1.6605	-1.7656	-1.6912	-0.3049	-1.7627	-1.6746
Marin	2020	ESL	-0.2511	1.5446	-1.3772	-0.1283	-0.4372	-0.7040	0.5035	-0.4345	-0.1821
Mendocino-Lake	2020	ESL	1.6962	1.7532	1.3922	1.7524	1.3236	1.4467	1.8393	-1.1673	1.7342
Merced	2020	ESL	-0.4398	-0.1247	-1.7523	-0.2803	-1.7242	-1.8546	0.4027	-0.4484	-0.4371
Mira Costa	2020	ESL	-0.4381	-1.0485	0.8008	-0.6038	0.3113	-0.8651	0.1811	-1.0717	-0.3133
Monterey	2020	ESL	-1.9031	-1.7852	-1.8492	-1.8299	-1.8599	-1.9342	-1.6345	-1.6596	-1.8965
Mt. San Antonio	2020	ESL	-0.6438	-0.8376	-0.3839	-0.6489	-0.4519	-1.8689	-0.4959	-0.4667	-0.6417
Mt. San Jacinto	2020	ESL	0.0516	-0.9719	0.3156	0.0662	-0.3457	-0.9424	0.0957	-0.5181	0.0815
Napa Valley	2020	ESL	-1.5609	-1.7567	-1.3461	-1.5953	-1.1261	-1.3025	-1.5265	-0.9682	-1.5962
North Orange	2020	ESL	-1.5477	-1.5475	-1.5402	-1.5402	-1.6012	-1.7950	-1.4770	-1.5426	-1.5447
Ohlone	2020	ESL	0.8032	1.2965	0.6729	0.7847	0.8214	-0.9177	1.0070	0.1637	0.9074
Palo Verde	2020	ESL	-1.4910	-1.4016	-1.8034	-1.4779	-1.5980	-1.9350	-1.2858	-1.6799	-1.4689

Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Palomar	2020	ESL	0.3400	0.0508	0.4903	0.0400	0.7741	0.4875	0.0685	-1.4884	0.3948
Pasadena	2020	ESL	-1.5020	-1.3824	-1.4273	-1.5180	-0.5235	-1.2949	-1.5989	-1.5865	-1.4955
Peralta	2020	ESL	1.1653	1.7232	0.6105	0.9669	0.9285	-0.8356	1.6742	1.0772	0.7123
Rancho Santiago	2020	ESL	-1.0550	-0.2320	-1.0164	-1.0409	-0.9820	-1.2908	-0.9665	-1.1599	-1.0502
Redwoods	2020	ESL	-1.6695	-1.3709	-0.3643	-1.3695	-0.6803	0.4667	-1.7932		
Rio Hondo	2020	ESL	1.0363	1.0169	0.9473	1.1108	-0.3817	0.4848	1.4539	0.0821	1.1645
Riverside	2020	ESL	1.1725	0.8556	1.3361	1.3407	0.3900	0.4379	1.5165	1.2457	1.1413
San Bernardino	2020	ESL	-0.0370	-0.1506	0.1369	0.0075	-0.2248	-0.9530	1.1931	-0.3960	0.0132
San Diego	2020	ESL	-1.8653	-1.8505	-1.8619	-1.8723	-1.7245	-1.7099	-1.9140	-1.8231	-1.8663
San Francisco	2020	ESL	-1.5294	-1.7542	-1.4110	-1.4719	-1.7855	-1.4257	-1.5610	-1.4027	-1.4996
San Joaquin Delta	2020	ESL	-1.0393	-0.9751	-1.0823	-0.9506	-1.3448	-1.2133	1.5889	-1.2280	-1.0144
San Jose-Evergreen	2020	ESL	1.2257	0.9452	1.3064	1.2564	0.8860	0.6608	1.2304	1.3287	1.1804
San Luis Obispo	2020	ESL	-0.4659	-0.2468	-0.8123	-0.3070	-0.7195	-1.1714	0.0013	-0.8965	-0.3164
San Mateo	2020	ESL	-1.2698	-1.2362	-1.3107	-1.2259	-1.4451	-1.2713	-1.2276	-1.2837	-1.2547
Santa Barbara	2020	ESL	-0.5359	-0.4464	-1.1645	-0.5295	-0.6027	-0.5227	-0.5379	-0.7638	-0.5138
Santa Clarita	2020	ESL	-0.3141	-0.4257	-0.1429	-0.3333	-0.2660	-0.2814	-0.3270	-0.9717	-0.2541
Santa Monica	2020	ESL	-1.3694	-1.3480	-1.4106	-1.3739	-1.2911	-1.3350	-1.4711	-1.2143	-1.3810
Sequoias	2020	ESL	-0.6407	0.6140	-1.4197	-0.6651	-0.1770	0.0204	-0.7893	-1.3148	-0.5873
Shasta-Tehama-Trinity	2020	ESL	-1.4476	-1.3825	-1.4489	-1.4841	-1.4177	-1.3884	-1.1558	-0.9975	-1.4436
Sierra	2020	ESL	-0.6834	-0.6626	-0.6758	-0.5691	-0.7187	-0.9999	1.5995	0.5897	-0.7077
Siskiyou	2020	ESL	-1.2033	-0.4602	-1.1278	-0.7690	-1.1100	-1.1861	-0.5256	0.6266	-1.2215
Solano	2020	ESL	-1.2491	-1.1200	-1.2429	-1.1372	-1.3032	-1.1818	0.2020	-1.1470	-1.1659
Sonoma	2020	ESL	-1.0138	-1.3350	-0.4064	-0.9957	-1.0090	-0.3292	-1.2952	-1.3333	-0.8841
South Orange	2020	ESL	0.8547	0.3252	1.0898	1.0178	0.0520	0.4092	0.8642	-0.2609	0.8808
Southwestern	2020	ESL	0.4859	1.0504	-0.2919	0.9026	-0.5192	-0.3011	1.0011	0.7938	0.4202
State Center	2020	ESL	-1.5895	-1.5483	-1.5676	-1.5874	-1.5264	-1.5815	1.4573	-1.8008	-1.5342
Ventura	2020	ESL	0.9691	0.7804	1.2156	1.0770	-0.2074	0.5543	0.8523	-0.6780	0.9839
Victor Valley	2020	ESL	-1.2724	-1.0806	-1.6103	-1.2590	-1.3309	-1.2673	-1.2450	-1.1026	-1.2753
West Hills	2020	ESL	0.1284	0.4300	-0.3133	0.2821	-0.4234	0.2103	-0.3499	0.8625	0.1019
West Kern	2020	ESL	-1.2410	-0.9949	-1.7014	-1.0809	-1.6448	-1.4637	-0.9186		
West Valley-Mission	2020	ESL	-1.0603	-1.2300	-0.9280	-1.0170	-1.1263	-1.2221	-0.1393	-1.2273	-0.9452
Yosemite	2020	ESL	0.2634	0.1334	0.4054	0.3088	0.1172	-0.0322	0.5407	0.7617	0.2076
Yuba	2020	ESL	-0.5246	-0.6238	-0.3135	0.0599	-1.1425	-1.0330	0.7402	-0.7062	-0.4777
Allan Hancock	2020	Non-ESL	-1.0374	-0.8612	-1.1003	-0.6334	-1.2492	-1.0068	-1.0749	-1.0974	-1.0335
Antelope Valley	2020	Non-ESL	0.6962	1.2905	-1.1158	1.6293	-1.5805	0.7030	0.3412	-0.9374	1.3064
Barstow	2020	Non-ESL	-1.2706	0.8268	-1.3692	0.2900	-1.3539	-1.1104	-1.4413		
Butte	2020	Non-ESL	-1.3819	0.6268	-1.2312	1.4698	-1.4163	-1.4247	1.5216		
Cabrillo	2020	Non-ESL	-1.0110	0.0006	-1.1658	-0.2952	-1.2086	-0.9647	-1.0270	-0.6675	-1.0170
Cerritos	2020	Non-ESL	1.8184	0.6071	0.5864	0.1890	0.6452	-0.3381	1.0830	-0.6728	1.8251
Chabot-Las Positas	2020	Non-ESL	-0.3283	0.5759	-1.1029	0.8357	-1.4921	-0.7181	1.4130	-1.2262	-0.0795
Chaffey	2020	Non-ESL	0.6087	0.7869	-1.0918	0.8405	-1.9571	0.6142	0.5822	-0.3074	0.6353
Citrus	2020	Non-ESL	-0.5326	0.1750	-1.3995	0.2622	-1.5868	-1.6506	1.9164	-1.8387	-0.0735
Coast	2020	Non-ESL	-1.6452	-0.9051	-1.5246	-1.5028	-1.6179	-1.5133	-1.7560	-1.6467	-1.6415
Compton	2020	Non-ESL	-2.0001	-1.9580	-1.8180			-2.0104	-1.5882		
Contra Costa	2020	Non-ESL	-1.4527	0.8467	-1.3867	-0.2301	-1.5393	-1.4914	-0.8593	-0.1146	-1.3156
Copper Mountain	2020	Non-ESL	-1.3760	0.8136	-1.5265	0.3246	-1.4925	-1.2803	-1.3921		
Desert	2020	Non-ESL	1.4586	1.3977	0.5946	1.4750	-1.3682	1.3037	0.3993	-1.3494	1.4520
El Camino	2020	Non-ESL	-1.1628	-0.6796	-0.1128	0.2538	-1.7659	-1.7948	1.3441	-1.4622	-0.8105
Feather River	2020	Non-ESL	-1.0241								
Foothill-Deanza	2020	Non-ESL	-1.4884	-1.3917	-1.4875	-1.4091	-1.6035	-1.3688	-1.4766	-1.5302	-1.4412
Gavilan	2020	Non-ESL	-0.6462	-0.3765	-0.7410	0.0289	-1.0876	-0.6860	-0.6304	-1.1348	-0.5992

Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
Glendale	2020	Non-ESL	-1.3258	-1.4328	-1.2161	-1.2267	-1.5314	-1.4430	-0.8516	-1.4283	-1.2210
Grossmont-Cuyamaca	2020	Non-ESL	-1.7952	-1.7338	-1.6540	-1.7921	-1.7031	-1.8017	0.9350	-1.5028	-1.7489
Hartnell	2020	Non-ESL	0.0597	0.7417	-1.0127	0.4320	-0.2812	0.4232	-0.3198	-1.5576	0.2589
Imperial	2020	Non-ESL	1.9227	1.8736	1.6879	1.9796	0.7885	1.9022	1.6544	-0.1858	1.8316
Kern	2020	Non-ESL	1.2729	1.4576	0.5608	1.3990	-1.7849	1.3259	-1.2229	-1.4468	1.2947
Lake Tahoe	2020	Non-ESL	0.6360	0.4807	0.6772	0.9687	-0.5257	0.7186	0.5699	0.9649	0.6253
Lassen	2020	Non-ESL	-0.5649	0.3752	-0.9384	0.2369	-1.1436	0.3473	-1.4394		-1.1636
Long Beach	2020	Non-ESL	1.4915	1.1010	-0.4294	1.2976	0.0656	1.7934	0.6471	-1.4591	1.5448
Los Angeles	2020	Non-ESL	-1.6087	-0.9686	-1.6744	-1.5872	-1.5735	-1.1847	-0.3243	-1.5222	-1.5895
Los Rios	2020	Non-ESL	-1.3471	1.2790	-1.5296	0.8623	-1.4756	-0.8038	-0.3768	-1.2084	-1.2922
Marin	2020	Non-ESL	-1.1075	0.4826	-0.9893	0.0253	-1.2880	-1.1087	0.3395	-0.5594	-1.1957
Mendocino-Lake	2020	Non-ESL	-1.7615	1.1129	-1.8391	0.8322	-1.8811	-1.7107	-1.2050	-1.3607	-1.7491
Merced	2020	Non-ESL	0.7805	0.7412	0.5455	1.1437	-1.5369	1.4973	0.1655	0.9786	0.7322
Mira Costa	2020	Non-ESL	-1.6995	-0.8857	-1.4985	-1.1758	-1.5384	-1.6083	-1.5451	-1.5763	-1.7117
Monterey	2020	Non-ESL	-1.2388	0.4239	-1.2394	-0.4431	-1.3363	-1.2595	-1.2144	-1.0968	-1.2378
Mt. San Antonio	2020	Non-ESL	1.4448	1.3757	1.4744	1.5472	-0.5440	1.5923	1.3195	-0.7267	1.4798
Mt. San Jacinto	2020	Non-ESL	0.2522	0.7193	-1.7732	0.9631	-1.7145	-0.3505	0.5542	-1.2419	0.3827
Napa Valley	2020	Non-ESL	-1.2532	-0.8778	-1.2652	-1.0029	-1.4016	-1.2237	-1.2744	-1.2506	-1.2476
North Orange	2020	Non-ESL	-1.3733	-1.1858	-1.3603	-1.3198	-1.2918	-1.1489	-1.6759	-1.5940	-1.3527
Ohlone	2020	Non-ESL	0.1133	1.3376	-0.0893	0.4540	-0.1644	-0.8410	0.6024	-1.4318	0.2569
Palo Verde	2020	Non-ESL	0.8940	1.3594	0.2420	1.5693	-0.5089	1.4495	-0.8259	-1.0813	0.9151
Palomar	2020	Non-ESL	-1.3232	1.1204	-1.3136	0.9584	-1.3971	-1.7981	-0.7831	-1.3795	-1.2824
Pasadena	2020	Non-ESL	-1.1874	0.4408	-1.3048	-0.5791	-0.0076	0.7951	-1.1910	-1.6709	0.8419
Peralta	2020	Non-ESL	-1.2521	-0.9488	-1.2617	-1.2245	-1.3387	-1.5682	-0.7498	-1.6146	-1.1784
Rancho Santiago	2020	Non-ESL	-1.7504	-0.6526	-1.4987	-1.3910	-1.4159	-1.1006	-1.7071	-1.7732	-1.7059
Redwoods	2020	Non-ESL	-1.0179	0.4675	-1.1036	0.9731	-1.4147	-1.3433	-0.5757		
Rio Hondo	2020	Non-ESL	-1.8158	-0.6301	-1.7143	-1.2460	-1.5474	-1.2501	-1.8730	-1.7306	-0.0262
Riverside	2020	Non-ESL	0.8385	0.7783	1.0056	1.0908	-1.7937	0.9725	0.5226	-1.5576	0.9294
San Bernardino	2020	Non-ESL	1.0648	1.1772	0.1820	1.2205	-1.8485	1.0051	1.1754	-0.7668	1.0602
San Diego	2020	Non-ESL	-1.9095	-1.4475	-1.8812	-1.9052	-1.8793	-1.8869	-1.8374	-1.0968	-1.9233
San Francisco	2020	Non-ESL	-0.7879	0.3669	-1.0213	-0.2082	-1.4993	-1.4864	0.0203	-1.1148	-0.4890
San Joaquin Delta	2020	Non-ESL	1.9190	1.7664	-0.3035	1.9620	-1.5531	1.2900	1.7217	-1.1009	1.9889
San Jose-Evergreen	2020	Non-ESL	-0.4922	0.9800	-1.4940	-0.0675	-0.5996	-1.2448	0.5535	-1.2931	0.4369
San Luis Obispo	2020	Non-ESL	1.2621	1.4042	1.0158	1.7103	-1.7189	0.0300	1.0189	-0.7194	1.3410
San Mateo	2020	Non-ESL	-1.4389	-1.3166	-1.4735	-1.4556	-1.4169	-1.2275	-1.9154	-1.8166	-1.3368
Santa Barbara	2020	Non-ESL	-1.2078	-1.1396	-1.2255	-0.9281	-1.3945	-1.3029	-0.7184	-1.2390	-1.1996
Santa Clarita	2020	Non-ESL	0.2988	0.8753	-0.7030	0.8239	-1.7805	0.1353	0.3224	-2.0224	0.3522
Santa Monica	2020	Non-ESL	-1.6578	0.5842	-1.4904	1.1521	-1.8007	0.2985	-1.3423	-1.5519	-1.3296
Sequoias	2020	Non-ESL	1.1049	1.0608	-0.9493	1.2360	-1.4692	1.1472	0.9639	-1.1581	1.1169
Shasta-Tehama-Trinity	2020	Non-ESL	-1.2109	-0.1441	-1.3533	-0.0417	-1.4811	0.1587	-1.2472	-1.5634	-1.2024
Sierra	2020	Non-ESL	-1.0696	0.7337	-1.5019	1.4566	-1.7329	-0.9499	-0.0037	-1.3674	-0.6261
Siskiyou	2020	Non-ESL	-0.9004	1.2326	-1.1656	0.0390	-1.7576	1.0094	-0.9708	-0.1342	-0.9025
Solano	2020	Non-ESL	-1.1283	1.3863	-1.2096	0.9757	-1.5233	-1.1913	-0.7816	-1.2399	-1.1151
Sonoma	2020	Non-ESL	-1.8120	0.9393	-1.8101	1.0636	-1.6129	-1.3231	-1.6115	-0.9077	-1.8465
South Orange	2020	Non-ESL	-1.0238	-0.1368	-1.1864	1.7047	-1.8190	-0.6180	-1.1951	-0.6551	-1.0158
Southwestern	2020	Non-ESL	0.1531	0.7353	-0.8219	0.6979	-0.7766	-0.9311	0.7824	0.8086	0.0148
State Center	2020	Non-ESL	0.7153	1.0017	-1.3455	1.0246	-1.4270	1.2613	-0.5413	-1.3946	0.7920
Ventura	2020	Non-ESL	-1.7936	0.8248	-1.6282	1.5990	-1.8536	-1.6518	-1.7679	-1.4902	-1.6973
Victor Valley	2020	Non-ESL	0.6676	1.7206	-0.8604	1.9501	-1.2353	0.7530	-1.0496	-1.0343	0.8430
West Hills	2020	Non-ESL	-0.5941	-0.1749	-1.6867	-0.2462	-1.8140	0.2098	-1.5840	-1.4231	-0.5569

**Appendix D: Normalized ESL and Non-ESL Enrollment Data, 2015-2019**

Locale Name	Academic Year	Program Type	Overall Enrollment	Hispanic	Non-Hispanic	Ss of Color	White	Perkins Economically Disadvantaged (Low-Income)	Not Perkins Economically Disadvantaged (Higher-Income)	Credit ESL	Non-Credit ESL
West Kern	2020	Non-ESL	-0.3584	0.0371	-0.9191	-0.0599	-0.9603	-0.2742	-0.4240		
West Valley-Mission	2020	Non-ESL	-1.2308	-0.8134	-1.2352	-0.8040	-1.4294	-1.1733	-1.2439	-1.3903	-1.1840
Yosemite	2020	Non-ESL	-0.0832	1.2651	-1.2867	1.6107	-1.6314	-0.8367	0.9216	-1.1387	0.3813
Yuba	2020	Non-ESL	-1.4430	-0.4909	-1.3814	-0.6252	-1.6062	-1.5994	-1.0796	-1.3931	-1.4249

**Appendix E: Statistical Analysis of Normalized Enrollment Change Data**

Academic Year	Category	ESL Z_mean*	Non-ESL Z_mean*	ESL Z_stddev	Non-ESL Z_stddev	T-test P-value	T-test Statistic
2016	Hispanic	0.0555	0.6737	1.1163	0.7880	0.0002	-3.8389
2018	Hispanic	-0.1607	0.3693	0.9683	0.7765	0.0005	-3.5980
2016	Low-Income	-0.2949	0.2140	1.0872	0.9441	0.0032	-2.9987
2017	White	0.0641	-0.3355	1.0897	0.7158	0.0116	2.5646
2019	White	-0.1235	-0.4542	1.0096	0.5575	0.0174	2.4160
2019	Non-Hispanic	-0.0884	-0.4114	0.9446	0.7245	0.0238	2.2863
2018	Ss of Color	-0.2553	0.1105	0.9685	0.9664	0.0269	-2.2373
2017	Non-Hispanic	0.0623	-0.2739	0.9567	0.9363	0.0361	2.1167
2016	Ss of Color	-0.0102	0.3813	1.1356	1.0691	0.0375	-2.1003
2018	Low-Income	-0.3147	-0.0311	0.8114	0.8712	0.0466	-2.0074
2019	Higher-Income	0.0793	-0.2009	1.0987	0.9241	0.1023	1.6449
2016	White	-0.0077	-0.2780	1.1887	0.8754	0.1280	1.5321
2018	Higher-Income	-0.0859	0.1617	0.8851	1.0859	0.1387	-1.4896
2018	Overall (all Ss)	-0.2184	0.0275	0.9457	1.0240	0.1394	-1.4867
2017	Hispanic	0.0639	0.2973	1.0231	0.9601	0.1631	-1.4020
2017	Higher-Income	0.2816	0.0539	1.1011	1.0093	0.2012	1.2844
2016	Overall (all Ss)	-0.0410	0.1681	1.2025	0.9932	0.2573	-1.1375
2016	Non-Hispanic	-0.0822	-0.2620	1.1373	0.9864	0.3127	1.0132
2017	Overall (all Ss)	0.0833	-0.0697	1.0232	0.9815	0.3614	0.9156
2019	Overall (all Ss)	-0.1065	-0.2406	0.9958	0.8153	0.3815	0.8780
2018	Non-Hispanic	-0.3002	-0.1878	0.9057	0.9185	0.4641	-0.7342
2019	Hispanic	-0.0904	0.0175	0.9830	0.9124	0.4990	-0.6779
2016	Higher-Income	0.2138	0.1175	1.1184	1.0845	0.6007	0.5245
2017	Low-Income	-0.0690	-0.1230	0.8927	0.9571	0.7286	0.3477
2019	Low-Income	-0.1997	-0.2474	0.9531	0.7663	0.7426	0.3290
2017	Ss of Color	0.1296	0.1751	0.9659	0.9608	0.7804	-0.2793
2019	Ss of Color	-0.0881	-0.0601	1.0694	0.9058	0.8669	-0.1679
2018	White	-0.1542	-0.1709	0.9611	0.6910	0.9059	0.1184

\* These numbers represent the change in enrollment from the previous academic year to the listed year

### APPENDIX F: Timeline of the Removal of the 2019 Public Charge Rule

Date	Action
<b>January 20, 2021</b>	President Joe Biden took office.
<b>February 2, 2021</b>	President Biden signed Executive Order 14,012: “Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans,” which directed federal agencies to review current public charge policy and provide recommendations about changes needed to restore the “integrity” of the U.S. immigration system within the next 60 days.
<b>March 9, 2021</b>	The Department of Justice dropped its defense of the 2019 public charge rule, leading to the dismissal of pending immigration cases related to the new public charge rule. U.S. Citizen and Immigration Services immediately stopped applying the rule in their dealings with immigrants, and the enforcement of the expanded public charge rule was vacated in its entirety.
<b>March 15, 2021</b>	The 2019 public charge rule was officially removed from the Federal Register, and statutes in line with the <i>1999 Field Guidance</i> were restored.

*Adapted from the Immigration Law Resource Center (2021)*