

XB12 Cross-Walk, Notes, and ASCCC Resolutions
3-11-23

The XB12 data element, as introduced, is consistent with the language of [Advocate for Development of a ZTC Data Element](#) (Spring 2021; Resolution Number: 11.02). That resolution specified the distinctions that, at a minimum, the data element needed to make. When a draft of the codes and their meanings was shared, issues were readily identified – but no changes were made. Consequently, a new resolution was passed in Fall of 2022 ([Clarify Components of XB12, the Instructional-Material-Cost Section-Level Data Element](#)). The table below summarizes the language – and the identified issues. It should be noted that there is an additional issue in that the resolutions, and XB12, are not about “instructional materials.” The term “instructional materials” refers to textbooks, supplemental materials, and supplies. ZTC and CEC §66406.9 (legislatively required no-cost marking) are limited to textbooks and supplemental materials. See [Establishing Consistent Definitions for Course Resources](#) (Fall 2022; Resolution 7.09) for ASCCC’s position to establish consistency with respect to the various terms used in reference to the resources that students purchase (this resolution is also included below for reference). The only truly impactful change (other than minor wording changes, terminology changes, and guidance) that is needed relates to differentiating between free resources and free resources that are openly licensed (OER).

Code	ASCCC 21S	XB12	ASCCC 22F	Notes
A	those that use no textbook and/or supplemental materials	Section has no associated instructional material	The ASCCC requests that the CCCC0 clarify that XB12 code A is to be used when a course section has no required text and/or supplemental materials	Suggestion seeks to have clarification provided.
B	sections that are zero textbook cost (ZTC) due to the use of no-cost open educational resources	Section uses only no-cost open educational resources/ Section uses only no-cost digital instructional material	The ASCCC work with the CCCC0 to modify the XB12 data element codes to differentiate between those sections that use no-cost OER and those that use other no-cost resources	The revision to B provides no mechanism for tracking OER use
C	ZTC but the resources have a cost that is not passed on to students	Section has instructional material costs none of which are passed on to students		C includes resources purchased on behalf of students or those purchased and loaned to students. Important for tracking sections supported by the college or district.
D	those that are low-cost as defined locally	Section has low instructional material costs (as defined locally)	Encourage the CCCC0 to clarify that “low instructional materials costs as defined locally” refers to a locally established cost threshold that must not be exceeded.	
Y	sections requiring student purchase of texts and/or supplemental resources	Section does not meet no-cost or low-cost criteria		Includes those requiring purchase of an access code and all instances when a printed resource is required and not provided

Codes and Their Purpose

The interest in having a data element to track the cost of textbooks and supplemental materials has various origins.

- Absent such a data element, there is no mechanism for tracking the impact of ZTC and/or OER. The addition of a section level data element would allow for enrollment patterns and student outcomes to be examined by section attributes allowing for the exploration of questions such as the following:
 - Is there a relationship between the cost of course materials for a section and how quickly that section fills?
 - Are students more successful in ZTC sections compared to those with a cost?
 - Are students more successful in OER sections as compared to those sections that are ZTC due to the use of resources that are not openly licensed?
- The introduction of a data element elevates the importance of gathering section-level cost data. Most colleges have not streamlined the identification of no-cost sections for the purpose of marking them in their schedules to be compliant with CEC §66406.9. Requiring that colleges gather cost data and code it appropriately has the potential to engage various college constituencies in identifying solutions that minimize the work involved in gathering and reporting these data. At present, it is common practice to have a stand-alone separate process for submitting textbook data and identifying course sections as zero cost.
- While colleges reported the establishment of ZTC pathways during the prior ZTC Program, no information was gathered to determine how course sections were able to be offered as ZTC. If the current ZTC Program is to have the impact envisioned, transparency is necessary to ensure maximal impact. HOW a section achieved ZTC status should be readily available so that colleges can learn from one another. This transparency is a necessary component of ensuring accountability.

Why have all the distinctions that have been proposed?

- As there are various ways to achieve ZTC status, being able to differentiate between them can serve various purposes.
 - A – Sections where there are no required texts and supplemental materials. As most courses do have required texts, the use of this code should not be extensive and may even be seen for specific courses, as opposed to course sections. [The IGETC Standards](#) make it explicit that a text should be listed in the course outline of record for transferable courses and, by extension, employed by faculty teaching said courses. Coding for some courses that do not require any resources could be simplified by recognizing that all sections of specific courses will always be coded A.
 - B1 - Section uses only no-cost open educational resources – Permits identification of those courses for which OER is available and allows for the effectiveness of OER to be assessed.
 - B2 - Section uses only no-cost digital instructional material – Allows tracking of the use of free resources by faculty and, potentially, could identify resources that need to be developed for CCC faculty use. Depending on the resource, access may cease to be free at any time.

- C – Code C tracks those instances where a section is ZTC because of an expenditure made by some other entity. This code allows for the tracking of sections that are ZTC but there is a cost involved. This allows for data to be captured regarding sections that will need on-going financial support in order to continue to be free.
- Code D allows the college to track those sections that have taken measures to decrease course costs but have not achieved zero.

Data Element – May 11, 2022

Section Data Elements

DED#	DATA ELEMENT NAME	FORMAT
XB12	INSTRUCTIONAL-MATERIAL-COST	X
This element indicates the cost of instructional material for the section.		

Coding	Meaning
A	Section has no associated instructional material
B	Section uses only no-cost open educational resources
C	Section has instructional material costs none of which are passed on to students
D	Section has low instructional material costs (as defined locally)
Y	Section does not meet no-cost or low-cost instructional material criteria

Data Element – Updated

Coding	Meaning
A	Section has no associated instructional material
B	Section uses only no-cost digital instructional material
C	Section has instructional material costs none of which are passed on to students
D	Section has low instructional material costs (as defined locally)
Y	Section does not meet no-cost or low-cost instructional material criteria

ASCCC Resolutions

[Advocate for Development of a ZTC Data Element](#) (Spring 2021; Resolution Number: 11.02)

Whereas, CEC §66406.9 requires that each of the California community colleges “(1) (A) Clearly highlight, by means that may include a symbol or logo in a conspicuous place on the online campus course schedule, the courses that exclusively use digital course materials that are free of charge to students and may have a low-cost option for print versions,” a legislated mandate for which little guidance has been provided;

Whereas, [Resolution 9.01 F20](#) established that the ASCCC recommends that the no-cost designation required by Education Code §66406.9 be used to recognize sections that use digital resources and sections that require a textbook yet are no-cost due to something other than a digital alternative, effectively aligning the requirements of the legislation and with those established by the CCCCO for courses that are zero textbook cost;

Whereas, CCR Title 5 §59404 mandates that districts that require students to “provide instructional materials for a course shall adopt policies or regulations” that “shall direct instructors to take reasonable steps to minimize the cost and ensure the necessity of instructional materials”; and

Whereas, No mechanisms presently exist for gathering data regarding local efforts to reduce the cost of instructional materials, confirming or encouraging compliance with Education Code 66406.9, or assessing compliance with Title 5 §59404;

Resolved, That the ASCCC collaborate with appropriate constituent groups and the CCCCO to implement a MIS course section data element that, at a minimum, is used to identify course sections that have no associated instructional materials costs;

Resolved, That the ASCCC support the establishment of a course section data element that, at a minimum, differentiates between sections requiring purchase of a textbook or other instructional materials including those requiring purchase of an access code and all instances when a printed resource is required and not provided, those sections that are zero textbook cost (ZTC) due to the use of no- cost open educational resources, those that are ZTC but the resources have a cost that is not passed on to students, those that use no textbook, and those that are low-cost as defined locally;

Resolved, That the ASCCC encourage the CCCCCO to make a proposed course section data element field regarding zero textbook cost materials available as soon as possible and include an appropriate timeline for its required use; and

Resolved, That the ASCCC support actions by the CCCCCO to encourage early adoption of a proposed data element regarding zero textbook cost materials, such as requiring its use in order to access zero textbook cost funding.

[Clarify Components of XB12, the Instructional-Material-Cost Section-Level Data Element](#) (Fall 2022; Resolution Number 7.09)

Whereas, The ASCCC advocated to establish a course section data element that, at a minimum, differentiates between sections requiring the purchase of a textbook or other instructional materials including those requiring purchase of an access code and all instances when a printed resource is required and not provided, those sections that are zero textbook cost (ZTC) due to the use of no-cost open educational resources, those that are ZTC but the resources have a cost that is not passed on to students, those that use no textbook, and those that are low-cost as defined locally (Resolution S21 11.02)^[1];

Whereas, XB12, Instructional-Material-Cost section level data element, was added to the California Community Colleges MIS Data Element Dictionary^[2] for implementation in summer 2022;

Whereas, While the XB12 Instructional-Material-Cost data element, as introduced, is aligned with the intent of Resolution S21 11.02,^[3] components of it are open to interpretation and important distinctions have not been made, including code A (section has no associated instructional material), which is intended for those sections that have no required instructional materials, code B (section uses only no-cost open educational resources), which inappropriately presumes that the only no-cost resources are open educational resources and that all open educational resources are no cost, and code D (section has low instructional material costs as defined locally), which presumes that there is a common understanding of what it means to establish a low-cost definition locally; and

Whereas, The ASCCC encourages colleges to implement a mechanism for identifying course sections that employ low-cost course materials because efforts to substantially decrease the costs of course materials should be recognized (Resolution F17 13.01^[4]), and recognizing the need for an alternative to the legislated zero-cost designation (CEC §66406.9^[5]) some colleges and districts have implemented a low-cost designation with low-cost being defined as below a locally specified dollar amount;

Resolved, That the ASCCC request that the CCCCCO clarify that XB12 code A is to be used when a course section has no required instructional materials;

Resolved, That the ASCCC work with the CCCCCO to modify the XB12 data element codes to differentiate between those sections that use no-cost open educational resources and those that use other no-cost resources; and

Resolved, That the ASCCC encourage the CCCCCO to clarify that “low instructional materials costs as defined locally” refers to a locally established cost threshold that must not be exceeded.

[1] Resolution S21 11.02 Advocate for Development of a ZTC Data Element: <https://asccc.org/resolutions/advocate-development-ztc-data-element>.

[2] California Community Colleges MIS Data Element Dictionary can be found at <https://webdata.cccco.edu/ded/xb/xb12.pdf>.

[3] Resolution S21 11.02 Advocate for Development of a ZTC Data Element: <https://asccc.org/resolutions/advocate-development-ztc-data-element>.

[4] Resolution F17 13.01 Recognition of Course Sections with Low-Cost Course Material Options: <https://asccc.org/resolutions/advocate-development-ztc-data-element>.

[5] CEC §66406.9: <https://codes.findlaw.com/ca/education-code/edc-sect-66406-9.html>.

[Establishing Consistent Definitions for Course Resources](#) (Fall 2022; Resolution 7.09)

Whereas, Provisions of the Higher Education Opportunity Act require each institution of higher education receiving federal financial assistance to “disclose, on the institution’s Internet course schedule and in a manner of the institution’s choosing, the International Standard Book Number and retail price information of required and recommended college textbooks and supplemental materials for each course listed in the institution’s course schedule” ^[1];

Whereas, CEC §66406.9 requires that California community colleges “clearly highlight, by means that may include a symbol or logo in a conspicuous place on the online campus course schedule, the courses that exclusively use digital course materials that are free of charge to students,”^[2] and CEC §78052 defines zero-textbook-cost degrees as “community college associate degrees or career technical education certificates earned entirely by completing courses that eliminate conventional textbook costs by using alternative instructional materials and methodologies”^[3];

Whereas, CCR, title 5, §59402 states that required instructional materials “means any materials which a student must procure or possess as a condition of registration, enrollment or entry into a class; or any such material which is necessary to achieve the required objectives of a course,”^[4] establishing “instructional materials” as inclusive of textbooks, supplemental materials, and

course supplies required to achieve course objectives but not included in the federal requirement of the costs required to be displayed in an institution's Internet course schedule; and

Whereas, Discussions regarding approaches to minimizing the costs associated with attending college and legislation related to course cost transparency should clearly differentiate between the costs of textbooks and supplemental materials (the focus of the Higher Education Opportunity Act, CEC § 66406.9,^[5] and CEC §78052^[6]) and course supplies;

Resolved, That the ASCCC work with the CCCCCO to ensure that the phrase "instructional materials" is defined as textbooks, supplemental materials, and course supplies, a more inclusive definition than that employed in the Higher Education Opportunity Act's cost transparency requirements, CEC §66406.9^[7] no-cost section marking requirement, and the CEC §78052^[8] definition of zero-textbook-costs.

[1] Pinhel, R. (2008). *Higher education opportunity act of 2008*. <https://www.cga.ct.gov/2008/rpt/2008-R-0470.htm>.

[2] CEC §66406.9: <https://codes.findlaw.com/ca/education-code/edc-sect-66406-9.html>.

[3] CEC §78052: <https://codes.findlaw.com/ca/education-code/edc-sect-78052/>.

[4] CCR, title 5, §59402: <https://casetext.com/regulation/california-code-of-regulations/title-5-education/division-6-california-community-colleges/chapter-10-community-college-administration/subchapter-7-instructional-materials/section-59402-definitions>.

[5] CEC §66406.9: <https://codes.findlaw.com/ca/education-code/edc-sect-66406-9.html>.

[6] CEC §78052: <https://codes.findlaw.com/ca/education-code/edc-sect-78052/>.

[7] CEC §66406.9: <https://codes.findlaw.com/ca/education-code/edc-sect-66406-9.html>.

[8] CEC §78052: <https://codes.findlaw.com/ca/education-code/edc-sect-78052/>.