

Exhibit 22

Information/Action Item

Consideration of institutional eligibility appeals for the 2014-15 Academic Year including Marymount California University, National Hispanic University, and Charles R. Drew University

MARYMOUNT CALIFORNIA UNIVERSITY

Marymount California University (“MCU”) is a non-profit private institution that has appealed the Commission’s determination that it is ineligible to participate in the Cal Grant Program for the 2014-15 academic year based upon its failure to meet the graduation rate threshold.

MCU is a liberal arts institution offering baccalaureate and master’s degrees. It is accredited by the Western Association of Schools and Colleges.

California law establishes that an institution with a “graduation rate of 30 percent or less for students for students taking 150 percent or less of the expected time to complete degree requirements, as reported by the United States Department of Education and as certified by the Commission ...” is not a qualifying institution for purposes of the Cal Grant Program. (Ed. Code section 69432.7(l)(3)(G).) MCU’s graduation rate, as certified by the Commission on October 1, 2013, was 30 percent, making it ineligible for Cal Grant participation. (See Exhibit 22.1 for the December 5, 2013 from Dr. Brophy to the Commission appealing MCU’s ineligibility status, including exhibits outlining MCU’s IPEDS data and a narrative. See Exhibit 22.2 for the dated December 20, 2013 from Dr. Brophy to the Commission appealing MCU’s ineligibility status including an additional exhibit; a December 20, 2013 letter from Martha Kanter, Under Secretary USED to Dr. Brophy confirming MCU’s account of IPEDS collections methods.)

MCU’s appeal rests upon its claim that its 2011 graduation rate is, in fact, 32 percent and that IPEDS will not correct its data despite a known error related to its 2005 cohort. MCU alleges that there was an error in the 2005 cohort data that was corrected when its 150% graduation rate was calculated in 2008, when it was a two-year institution. However, following its transition to a four-year institution in 2010, its 150% graduation rate for the 2005 cohort had to be re-calculated for 2011 (6 years after the entrance of the cohort despite there being no baccalaureate candidates related to the 2005 cohort). In 2011 when IPEDS pre-populated the data for the 2005 cohort, the original data – not the corrected data – was inserted for the cohort. MCU failed to catch the reversion to the incorrect data in time for it to be corrected by IPEDS. MCU claims that the data for the 2005 cohort should have been 98 graduates out of 304 students (32%), not the 108 graduates out of 360 students (30%) that is being reported.

IPEDS has confirmed that the information provided by MCU is correct and that there is a discrepancy between the 2008 data and the 2011 data related to the 2005 cohort and that IPEDS pre-populated the 2011 data with the original data, not the corrected data. IPEDS also confirmed that had MCU noted this error earlier that the error could have

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been corrected; however, because of the amount of time that has elapsed since this data was reported, it cannot be changed.

Cal Grant Data:

Beginning with the 2011/12 academic year, the cohort default rate threshold was established by statute for Cal Grant participating institutions. The following academic year, the graduation rate threshold was added to the statute. For the 2011/12, 2012/13 and 2013/14 academic years, MCU has been eligible to participate in the Cal Grant program. For 2013/14, MCU's graduation rate has made it ineligible for the Cal Grant Program. Although the cohort default rate data that the Commission will certify for the 2015/16 academic year is not yet available, the next cohort of graduation rate data was recently published by USED. MCU's graduation rate of 36.6 percent meets the threshold for participation for 2015/16 academic year.¹

AY	% BORROWERS	CDR	GRAD RATE	GRAD RATE YEAR	CAL GRANT STUDENTS	CAL GRANT FUNDS
2011/12	40%	5.34%	--	--	279	\$1,564,513
2012/13	40%	12.4%	157/398 = 39.4%	2010	264	\$1,770,850
2013/14	49%	11.9%	157/398 = 39.4%	2010	357	\$1,345,078
2014/15	58%	12.3%	108/360 = 30.0%	2011	Ineligible	---
2015/16	--	--	112/306 =36.6%	2012		

MCU's appeal is, in essence, a claim that although the USED published data does not, on its face, meet the statutory requirements; it has, in fact, complied with the statute. The Commission has previously granted an appeal under similar circumstances. Menlo College successfully appealed its ineligibility for the 2013/14 academic year based on an error in its USED reported data, claiming that it had, in fact, met the requisite threshold. As part of the Menlo College appeal, the Commission made certain findings upon which the appeal was granted. The Commission found:

1. *Menlo College has been determined to be ineligible for Cal Grant awards for 2013-14 because the United States Department of Education (USED) has reported the Menlo College 2009 3-year cohort default rate (CDR) to be higher than the maximum CDR of 15.5% authorized by Education Code section 69432.7(1)(3)(C).*
2. *Due to a mistake by a loan servicer involving data for just one student, Menlo College's CDR was incorrectly calculated to be 15.6%.*
3. *Using factually correct data, Menlo College's CDR is 15.15%.*

¹ This assumes that USED does not publish newer graduation rate data that the Commission would be statutorily required to use for the certification. It also assumes that there is no change to the 30 percent or less standard currently in statute.

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4. Menlo College failed to timely avail itself of USED challenge and appeal processes to correct the mistake.
5. USED has verified that had Menlo College timely challenged and appealed the mistakenly calculated CDR, USED's reported 2009 3-year CDR for Menlo College would have been below 15.5%, and that the Menlo College would have been eligible for Cal Grant awards in 2013-14.

From these findings, the Commission concluded:

The Commission concludes that despite the technical lack of compliance with the method by which Education Code section 69432.7(1)(3)(C) requires the Commission to identify a CDR to use to establish institutional eligibility for a Cal Grant, Menlo College complies with the substantive standard established by section 69432.7(1)(3)(C) by having a factually correct CDR below 15.5%. This satisfies the primary purpose of section 69432.7(1)(3)(C) and constitutes substantial compliance for purposes of determining Menlo College for Cal Grants.

Based on these unique circumstances, the appeal by Menlo College was granted.

MCU similarly meets these criteria.

1. MCU has been determined to be ineligible for Cal Grant awards because the United States Department of Education (USED) has reported MCU's graduation rate to be lower than the minimum graduation rate authorized by Education Code section 69432.7(1)(3)(G).
2. Due to a mistake by the institution, MCU's graduation rate was incorrectly calculated to be 30%.
3. Using factually correct data, MCU's graduation rate is 32%.
4. MCU failed to timely avail itself of USED challenge and appeal processes to correct the mistake.
5. USED has verified that had MCU timely challenged and appealed the mistakenly calculated graduation rate, USED's reported 2011 graduation rate for MCU would have been above 30%, and that Marymount would have been eligible for Cal Grant awards in 2014-15.

Recommended Action: Based upon application of the criteria established by the Commission previously, staff is recommending that the appeal of MCU be granted and that MCU's eligibility for Cal Grant participation in 2014-15 academic year be re-instated.

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NATIONAL HISPANIC UNIVERSITY

National Hispanic University (“NHU”) is a for-profit private institution that has appealed the Commission’s determination that it is ineligible to participate in the Cal Grant Program for the 2014-15 academic year based upon its failure to meet the graduation rate threshold. (See Exhibit 22.3 for the December 24, 2103 letter from President and Provost Gladys N. Ato, Psy.D., appealing the Commission’s determination that NHU was ineligible to participate in the Cal Grant Program for 2014-15.)

NHU offers associate degrees, baccalaureate degrees and master’s degrees in programs such as business administration, child development, computer science, criminal justice, education, mathematics and science, psychology and translation and interpretation. NHU is accredited by the Western Association of Schools and Colleges.

It has recently been reported that NHU has stopped enrolling students due to financial problems, and will focus on serving its 600 currently enrolled students. (See <http://www.sacbee.com/2014/01/27/6104439/national-hispanic-university-halts.html>) According to an opinion article in the *San Jose Mercury*, dated January 28, 2014, the Chairs of the NHU Board and the NHU Foundation Board confirm that NHU will not enroll new students, and state that NHU is facing financial difficulties due, in part, to USED action “to close off access to federal financial aid for [a significant academic program] and to limit new programs.” (See Exhibit 22.4.) They further state:

Within the next two months, our board and the school leadership will determine the best pathway forward, with our students’ educations and the community’s needs at the forefront. We don’t know yet what that final plan is, but we know that continued engagement with our community will help us make the right decisions.

(See Exhibit 22.4.)

California law establishes that on October 1st of each year, the Commission shall certify “the institution’s latest ... graduation rate as most recently reported by the United States Department of Education.” (Ed. Code section 69432.7(l)(3)(A).) Furthermore, an institution with a “graduation rate of 30 percent or less for students for students taking 150 percent or less of the expected time to complete degree requirements, as reported by the United States Department of Education and as certified by the Commission ...” is not a qualifying institution for purposes of the Cal Grant Program. (Ed. Code section 69432.7(l)(3)(G).) On October 1, 2013, in accordance with the statute, the Commission certified the cohort default rates and graduation rates of the institutions seeking to participate in the Cal Grant Program as required by law. NHU’s graduation rate was 18 percent, rendering it ineligible for Cal Grant program participation for the 2014-15 academic year.

At the time of the Commission’s certification, the latest reported graduation rate data reported by the U.S. Department of Education (USED) was for the 2005 cohort. NHU is requesting that the Commission utilize the 2006 cohort data, instead of the 2005 cohort data, for the 2014-15 academic year. NHU indicates that it “placed significant resources and effort into financial counseling and student support services for its students entering in 2006” and, as a result, the graduation rate for the 2006 cohort improved to 32 percent. In its letter, NHU acknowledges that, as of December 24, 2013, the USED “has yet to post the most recent data on its website.”

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On January 10, 2014, NHU submitted an additional correspondence indicating that USED had posted the graduation rate data for the 2006 cohort and reported a 32 percent graduation rate for NHU. (See Exhibit 22.5.)

Cal Grant Data:

AY	% BORROWERS	CDR	Grad rate	GRAD RATE YEAR	CAL GRANT STUDENTS	CAL GRANT FUNDS
2011/12	19%	10.0%	47/83 = 56.6%	2009	99	\$568,322
2012/13	19%	10.17%	6/27 = 22.2%	2010	101	\$549,649
2013/14	30%	14.0%	6/27 = 22.2%	2010	97	\$257,510
2014/15	52%	14.5%	22/121 = 18.2%	2011	Ineligible	
2015/16	--	--	21/64 = 33%	2012		

The Cal Grant statute requires that the Commission certify the cohort default rate and graduation rate by October 1st each year and requires the Commission to use the data most recently reported by USED as of October 1st. At the time of the Commission's certification on October 1, 2013, the 2005 cohort was the most recently reported data for NHU.

In this case, NHU is not arguing that the 2005 cohort data reported by USED is mistaken. It does not assert that the correct 2005 data would result in a graduation rate greater than 30%. It is arguing, instead, that the Commission should use data for a completely different cohort – the 2006 cohort. However, it is staff's conclusion that the 2006 cohort data cannot be used because USED did not report this data until January 2014, several months *after* the October 1st certification deadline. Therefore, NHU's certified graduation rate based on the unchallenged 2005 cohort data is 30%, and renders NHU ineligible to participate in the Cal Grant program.

Recommended Action: Staff is recommending that NHU's appeal be denied.

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CHARLES R. DREW UNIVERSITY OF MEDICINE AND SCIENCE

Charles R. Drew University of Medicine and Science (“CDU”) is a non-profit private institution that has appealed the Commission’s determination that it is ineligible to participate in the Cal Grant Program for the 2014-15 academic year based upon its failure to meet the graduation rate threshold. (See Exhibit 22.6 for the December 13, 2013 correspondence from President David Carlisle appealing the Commission’s determination that CDU was ineligible to participate in the Cal Grant Program for 2014-15.)

CDU offers associate degrees in Health Information Technology and Radiologic Technology, a Life Sciences baccalaureate degree, an Urban Public Health master’s degree, a Medicine doctoral degree (jointly with UCLA), and graduate degrees in nursing through its three colleges. It provides low-income and underserved students with education in the health professions – 90 percent of its current 88 undergraduates and 426 graduate students are minorities. It is accredited by the Western Association of Schools and Colleges.

California law establishes that an institution with a “graduation rate of 30 percent or less for students taking 150 percent or less of the expected time to complete degree requirements, as reported by the United States Department of Education and as certified by the Commission ...” is not a qualifying institution for purposes of the Cal Grant Program. The Commission certified CDU’s graduation rate as 0 percent, rendering them ineligible for Cal Grant participation. (Ed. Code section 69432.7(l)(3)(G).)

CDU’s appeal rests upon the fact that its 2005 cohort, from whom the 2011 graduation rate is derived, is an extremely small cohort. Only 9² first-time/full-time students were included in the 2005 cohort students. Most of CDU’s undergraduate students do not start as first-time, full-time freshman although almost one-third of CDU’s students receive a Cal Grant. CDU suggests that if the Commission were to either consider graduation rates for either its entire undergraduate population or just its Cal Grant recipient population that both of these numbers would exceed the 30% threshold.

Cal Grant Data:

AY	% BORROWERS	CDR	Grad rate	GRAD RATE YEAR	CAL GRANT STUDENTS	CAL GRANT FUNDS
2011/12	---	----	47/83 = 56.6%	2009	35	\$106,671
2012/13	74%	10.89%	62/88 = 70.5%	2010	21	\$114,692
2013/14	95%	7.5%	62/88 = 70.5%	2010	39	\$70,269
2014/15	80%	12.2%	0/8 = 0%	2011	Ineligible	
2015/16	--	--	0/4 = 0%	2012		

² It is unclear why there is a discrepancy between the 9 students mentioned by CDU and the 8 that CSAC located on IPEDS.

California Student Aid Commission

Staff first notes that CDU's point about small cohorts is well-taken. Changes within small cohorts can have a disproportionate effect when compared to similar changes in large cohorts. And, there are some instances in which that disproportionate effect is taken into account. For example, at the federal level, USED does take into account small cohort size before it sanctions an institution with a CDR that exceeds the 30 percent federal participation threshold. If an institution has a CDR that is based upon 30 or fewer borrowers over three fiscal years, then the institution is not subject to sanction despite exceeding the threshold.

Here, however, the Cal Grant statute requires that the Commission certify the graduation rate by October 1st each year based upon the data most recently reported by USED. USED reported CDU's graduation rate to be 0/8, or zero. The data are factually correct; CDU is not arguing otherwise.

Further, although there is a statutory exception for institutions that have fewer than 40 percent of their students borrowing federal student loans, for which CDU does not qualify, there is no such exception based upon small cohorts of students in the reporting population. Despite the appeal of CDU's point about the potential disproportionality of small cohorts, the language of the law does appear to constrain the Commission's ability to provide an immediate remedy.

The Commission may want to consider supporting amendments to the CDR and graduation rate requirements to accommodate institutions with small cohorts. For example, the amendment could allow the Commission to calculate a three-year average for an institution using the three most recent CDRs and/or graduation rates for an institution if, for the academic year being certified, the institution had fewer than 20 students (or whatever number seems appropriate) in the cohort. This would have the effect of smoothing, over several years, the effects of a few students in a small cohort that either default on their loans or do not graduate within 150% from negatively impacting an institution's Cal Grant eligibility so long as the three year average still meets or exceeds the qualitative standards established by the statute. Or, alternatively, an express exception for small cohorts, including a definition of "small", could be fashioned.

Recommendation: Staff is recommending that CDU's appeal be denied. Staff would recommend, however, that the Commission support amending the CDR and graduation rate requirements to accommodate institutions with small cohorts.

Responsible Person(s): Janet McDuffie, Chief
Administration and External Affairs Division

Keri Faseler Tippins, General Counsel and Chief
Legal & Audit Services

December 5, 2013

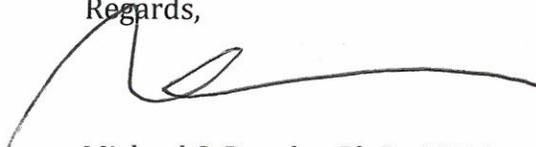
California Student Aid Commission
Attn: Mr. John R. McDowell, Chair, CSAC
P.O. Box 419026
Rancho Cordova, CA 95741-9026

Dear Chairman McDowell and CSAC members:

I write with great urgency on behalf of Marymount California University with an appeal to CSAC to reconsider its recent decision regarding our 2014-2015 Cal Grant eligibility. The attached document clearly details the administrative errors made in reporting the graduation rate of our 2005 first-time freshmen cohort in 2011. Due to the potential damaging impact the current decision may have on our students and potential students, we respectfully ask that the Commission review our appeal as soon as humanly possible.

I am happy to provide more information as needed or be available by phone in order to review the data provided and answer any questions. I would also appreciate the opportunity to present this information to the Commission when it meets. As outlined on the attached document, a significant percentage of our students receive Cal Grants and have great financial need, so I hope that an affirmative decision can be made very soon. Please know how grateful Marymount is for all the Commission's considerations.

Regards,



Michael S. Brophy, Ph.D., M.F.A.
Email: mbrophy@marymountcalifornia.edu
Direct Phone: 310-303-7200
Cell Phone: 310-944-2306

cc: Mrs. Diana Fuentes Michel, Executive Director, CSAC

Oceanview Campus

30800 Palos Verdes Drive East
Rancho Palos Verdes, CA 90275
310-377-5501

Lakeside Campus

3700 Country Club Drive
Lucerne, CA 95458
888-991-5253

Marymount California University Cal Grant Eligibility Appeal

In 2008, Marymount California University was an Associate's degree granting institution named Marymount College Palos Verdes. During the 2008-2009 academic year we reported our 150% time-to -degree completion (three year) graduation rates to IPEDS. The report described the graduation rate for our 2005 first-time, freshmen cohort. The original report mistakenly cited 108 graduates out of a cohort of 360 students for a graduation rate of 30%. This report was incorrect as it included transfer students. The IPEDS data was later revised and the final, published IPEDS report cited 98 graduates out of 304 students for a correct graduation rate of 32%. The 2008 report is certified and is public record. (Exhibit A) <http://nces.ed.gov/ipeds/datacenter/Facsimile.aspx?unitid=acacb3b0afac>

In 2010, Marymount California University became a Bachelor's degree granting institution offering both Bachelor's and Associate's degrees. As a "four-year" institution IPEDS required that we adopt a six-year degree completion rate. Consequently, in 2011 we again had to report the graduation rates for our 2005 cohort, even though no students from this cohort had yet received a Bachelor's degree from Marymount California University. They all had transferred on to other institutions in between 2005 and 2011. Naturally, the number of students who earned an Associate's degree from the original 2005 cohort had not changed, so the graduation rate was unchanged and remained 32%. Our first Bachelor's graduates were 2012 so they are not a factor in any of this reporting, even though we were required by IPEDS to adopt the six-year parameters in 2011.

Unfortunately when Marymount California University received the 2011 IPEDS Graduation Rate Survey the cohort data fields were pre-populated by IPEDS with the original, unrevised, 2008 data. Apparently this policy is systemic to IPEDS, as verified in the attached email. (Exhibit B) Our registrar that year did not catch this mistake by IPEDS and assumed, incorrectly, that the data was already revised and final. This is the reason our 2011 survey of the 2005 cohort incorrectly shows 108 graduates out of a cohort of 360 students for an incorrect graduation rate of 30%. (Exhibit C) <http://nces.ed.gov/ipeds/datacenter/Facsimile.aspx?unitid=acacb3b0afac>

Marymount California University has more than doubled its enrollment within the last four years, making access for deserving needy students from all over the state. The attached report (Exhibit D) shows that we currently serve 256 Cal Grant students. This cohort receives more than \$2M of Cal Grant aid and their families can contribute no more than \$1,267 on average to their student's education. Removing our Cal grant eligibility would be devastating to both our students and our University, as it would prevent 25% of our students from attending Marymount.

As you consider this appeal please recognize the evolving nature of our University, one that has decades of experience in preparing students for transfer to public and private universities. The attached report (Exhibit E) demonstrates our success in preparing students for Bachelor's degree attainment at other universities. Our new identity as a Bachelor's and, now, Master's degree granting institution means that a good number of our freshmen complete their bachelor's degrees at Marymount, but the evolving nature of our institution presents some difficulty in presenting our graduation story within a rigid IPEDs structure.

Exhibit A

Graduation rates

Calculation of 4-year average rates: cohort adjustment

Screen 1 of 3	2002	2003	2004	2005	4-year Total
Men					
Revised cohort (III,10)	186	172	182	142	682
Total exclusions (III,45)				0	0
Adjusted cohort	186	172	182	142	682
Women					
Revised cohort (III,10)	208	202	235	162	807
Total exclusions (III,45)				0	0
Adjusted cohort	208	202	235	162	807
Total (men and women)					
Revised cohort (III,10)	394	374	417	304	1,489
Total exclusions (III,45)				0	0
Adjusted cohort	394	374	417	304	1,489

Institution: Marymount College (118541)

Graduation rates

Calculation of 4-year average rates: completers within 150% of normal time

Screen 2 of 3	2002	2003	2004	2005	4-year Total
Men					
<2-yr completers (III,11)	39	6		42	87
2<4-yr completers (III,12)	11	85	43	0	139
Total completers within 150%	50	91	43	42	228
Women					
<2-yr completers (III,11)	47	4		56	107
2<4-yr completers (III,12)	9	138	74	0	221
Total completers within 150%	56	142	74	56	328
Total (men and women)					
<2-yr completers (III,11)	86	10		98	194
2<4-yr completers (III,12)	20	223	117	0	360
Total completers within 150%	106	233	117	98	554

Exhibit B

-----Original Message-----

From: IPEDS Email [mailto:ipedshelp@rti.org]
 Sent: Wednesday, December 04, 2013 11:50 AM
 To: Michael Semenoff; IPEDS Email
 Cc: Michael Brophy
 Subject: RE: Attention: Donald Hairston 118541

Hello Michael,

Yes, the 2011 Graduation Rate (GR) survey was auto populated with original data provided in the 2005 Fall Enrollment (EF) Survey of full time/first time students enrolled. Shown below is the page from 2005 EF containing those data. I copied this page from the original survey data in the IPEDS Data Center. Also, you are correct that in 2011 the opportunity to revise the initial cohort was available in GR but the same initial cohort data was used.

Enrollment 2005-06

Institution: Marymount California University (118541) Part A - Fall Enrollment by race/ethnicity and gender

Enrollment as of the institution's official fall reporting date or as of October 15, 2005

CIPCODE: 99.0000 -- Summary

Full-time undergraduate students

Students enrolled for credit Degree/certificate-seeking Non-degree/
 non-certificate-seeking

(4) Total,
 full-time
 undergraduate students

(5)
 First-time

(1) Other
 degree/certificate-
 seeking

(2) Total

(3)
 Men
 Nonresident alien 17 30 47 47
 Black, non-Hispanic 6 5 11 11
 American Indian/Alaska Native 1 0 1 1
 Asian/Pacific Islander 15 13 28 28
 Hispanic 17 25 42 42

White, non-Hispanic	94	72	166	166
Race/ethnicity unknown	22	17	39	39
Total men	172	162	334	334
Total men prior year	171	330	330	
Women				
Nonresident alien	18	11	29	29
Black, non-Hispanic	8	8	16	16
American Indian/Alaska Native	1	0	1	1
Asian/Pacific Islander	9	18	27	27
Hispanic	42	41	83	83
White, non-Hispanic	78	75	153	153
Race/ethnicity unknown	32	33	65	65
Total women	188	186	374	374
Total women prior year	227	381	381	
Total men + women	360			

Please contact the Help Desk if you need further assistance.

Donald K. Hairston
 IPEDS Help Desk
 1-877-225-2568
ipedshelp@rti.org

-----Original Message-----

From: Michael Semenoff [<mailto:MSemenoff@marymountcalifornia.edu>]
 Sent: Wednesday, December 04, 2013 2:19 PM
 To: IPEDS Email
 Cc: Michael Brophy
 Subject: RE: Attention: Donald Hairston 118541

Hi Donald,
 Would you verify for me, per our conversation Monday 12/02/13, that in 2011 our graduation rate survey for our 2005 freshmen cohort was automatically populated with the original 2005 survey responses, not the revisions? I need to be certain that using original data is systemic to IPEDS. We had the opportunity in 2011 to revise again, but our reporter used the data provided within the IPEDS survey. I believe you verified this with a supervisor.
 Thanks.

Michael Semenoff
 Director of Research, Planning, and Assessment Marymount California University
 310-377-5501
msemenoff@marymountcalifornia.edu

Exhibit C

Graduation rates

Calculation of 4-year average rates: Cohort adjustment

Screen 1 of 3	2002	2003	2004	2005	4-year Total
Men					
Revised cohort (I,01)	142	134	171	172	619
Total exclusions (II,45)				0	0
Total exclusions (III,45)				0	0
Adjusted cohort	142	134	171	172	619
Women					
Revised cohort (I,01)	162	169	227	188	746
Total exclusions (II,45)				0	0
Total exclusions (III,45)				0	0
Adjusted cohort	162	169	227	188	746
Total (men and women)					
Revised cohort (I,01)	304	303	398	360	1,365
Total exclusions (II,45)				0	0
Total exclusions (III,45)				0	0
Adjusted cohort	304	303	398	360	1,365

Graduation rates

Calculation of 4-year average rates: Completers within 150% of normal time

Screen 2 of 3	2002	2003	2004	2005	4-year Total
Men					
<2-yr completers (II,11)				0	0
2<4-yr completers (II,12)				0	0
Bachelor's completers (II,18)				0	0
<2-yr completers (III,11)	42	40	40	2	124
2<4-yr completers (III,12)		15	22	40	77
Bachelor's completers (III,18)				0	0
Total completers within 150%	42	55	62	42	201
Women					
<2-yr completers (II,11)				0	0
2<4-yr completers (II,12)				0	0
Bachelor's completers (II,18)				0	0
<2-yr completers (III,11)	56	61	61	2	180
2<4-yr completers (III,12)		11	34	64	109
Bachelor's completers (III,18)				0	0
Total completers within 150%	56	72	95	66	289
Total (men and women)					
<2-yr completers (II,11)				0	0
2<4-yr completers (II,12)				0	0
Bachelor's completers (II,18)				0	0
<2-yr completers (III,11)	98	101	101	4	304
2<4-yr completers (III,12)		26	56	104	186
Bachelor's completers (III,18)				0	0
Total completers within 150%	98	127	157	108	490

Exhibit D

Term	Total Enrollment	# Cal Grant Recipients	Annual Aid	Average per Recipient	Average EFC
Fall 2005	708	96	\$746,870	\$7,780	\$964
Fall 2006	630	63	\$432,234	\$6,861	\$895
Fall 2007	656	67	\$394,866	\$5,894	\$849
Fall 2008	573	72	\$522,616	\$7,259	\$901
Fall 2009	561	73	\$563,000	\$7,712	\$545
Fall 2010	793	134	\$930,998	\$6,948	\$1,351
Fall 2011	940	196	\$1,559,754	\$7,958	\$913
Fall 2012	1001	229	\$1,822,734	\$7,960	\$1,049
Fall 2013	1037	256	\$2,240,352	\$8,751	\$1,267

Exhibit E

Term	# of entering 1st-time freshmen registered students	# earned MCU degree	% earned MCU degree	Average GPA of Transfer Out/No MCU degree	Average Units of Transfer Out/No MCU degree	# transfer outs directly to 4-year	# earning BA	% earning BA
Fall 2005	304	98	32%	2.37	34	117	84	72%
Fall 2006	306	112	37%	2.61	35	138	90	65%
Fall 2007	334	104	31%	2.57	35	142	84	59%

Data Sources: IPEDS, National Student Clearinghouse, MCU

RECEIVED

2013 DEC 23 PM 1:11

CSAC
EXECUTIVE OFFICE

December 20, 2013

California Student Aid Commission
Attn: Mr. John R. McDowell, Chair, CSAC
P.O. Box 419026
Rancho Cordova, CA 95741-9026

Dear Chairman McDowell and CSAC members:

I write again to request that you review the technical error leading to the Cal Grant ineligibility finding for Marymount California University (MCU). Attached you will find a letter from Under Secretary of Education, Martha Kanter, confirming how the technical error occurred between IPEDS and MCU in 2011 when IPEDS prepopulated the 2005 graduation rate for first-time freshman. Correctly certified by the US Department of Education in 2008, this information was incorrectly reported in 2011 and unnoticed by MCU. Our original letter that details this technical error is attached as reference.

We ask that you consider this request with all great care and urgency as we fear that this incorrect technical finding could seriously hurt our Cal Grant students as well as our small university.

Please contact me with any and all questions regarding this matter. We appreciate all the time you will devote to this most significant request.

Regards,



Michael S. Brophy, Ph.D., M.F.A.
Email: mbrophy@marymountcalifornia.edu
Direct Phone: 310-303-7200
Cell Phone: 310-944-2306

cc: Mrs. Diana Fuentes Michel, Executive Director, CSAC



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF THE UNDER SECRETARY

December 20, 2013

Michael S. Brophy, Ph.D., M.F.A.
 30800 Palos Verdes Drive East
 Rancho Palos Verdes, CA 90275

Dear President Brophy,

Thank you for your letter of December 10, 2013 regarding Marymount California University's eligibility as a Cal Grant receiving institution. The account of the IPEDS collection methods provided by Marymount California University is accurate. IPEDS does prepopulate the data entry screens and instructs institutions to verify and edit this information as needed. It is understandable that during a change in curriculum from a 2- to a 4-year degree granting status that there would be a greater possibility of misreporting information to IPEDS. The IPEDS system is designed to reflect and accommodate measurement of postsecondary institutions. During times of change for an institution it is reasonable to offer additional consideration when reviewing qualifying metrics.

The request by the institution to use an alternate year in the review process is reasonable if the resulting data used reflect a comparable measurement and it applies equivalent rigor to the grants process. In this case, the request to use an alternate year reflects a desire to provide more accurate data that measures the same outcome for a different year. Ultimately, any decision to deviate from the standards outlined in the review process is that of the grants program. However, as an institution's mission changes it is reasonable to be flexible in accommodating both the institution's transition and the requirements of a grants program.

If you have any questions, please contact Jon O'Bergh at jon.obergh@ed.gov.

Sincerely,

Martha J. Kanter
 Under Secretary
 United States Department of Education

400 MARYLAND AVE., S.W., WASHINGTON, DC 20202
www.ed.gov

Our mission is to ensure equal access to education and to promote educational excellence throughout the nation.

*amazing lives in view***MARYMOUNT**
CALIFORNIA UNIVERSITY

OFFICE OF THE PRESIDENT

December 5, 2013

California Student Aid Commission
Attn: Mr. John R. McDowell, Chair, CSAC
P.O. Box 419026
Rancho Cordova, CA 95741-9026

Dear Chairman McDowell and CSAC members:

I write with great urgency on behalf of Marymount California University with an appeal to CSAC to reconsider its recent decision regarding our 2014-2015 Cal Grant eligibility. The attached document clearly details the administrative errors made in reporting the graduation rate of our 2005 first-time freshmen cohort in 2011. Due to the potential damaging impact the current decision may have on our students and potential students, we respectfully ask that the Commission review our appeal as soon as humanly possible.

I am happy to provide more information as needed or be available by phone in order to review the data provided and answer any questions. I would also appreciate the opportunity to present this information to the Commission when it meets. As outlined on the attached document, a significant percentage of our students receive Cal Grants and have great financial need, so I hope that an affirmative decision can be made very soon. Please know how grateful Marymount is for all the Commission's considerations.

Regards,



Michael S. Brophy, Ph.D., M.F.A.
Email: mbrophy@marymountcalifornia.edu
Direct Phone: 310-303-7200
Cell Phone: 310-944-2306

cc: Mrs. Diana Fuentes Michel, Executive Director, CSAC

Oceanview Campus
30800 Palos Verdes Drive East
Rancho Palos Verdes, CA 90275
310-377-5501

Lakeside Campus
3700 Country Club Drive
Lucerne, CA 95458
888-991-5253

MarymountCalifornia.edu

Marymount California University Cal Grant Eligibility Appeal

In 2008, Marymount California University was an Associate's degree granting institution named Marymount College Palos Verdes. During the 2008-2009 academic year we reported our 150% time-to-degree completion (three year) graduation rates to IPEDS. The report described the graduation rate for our 2005 first-time, freshmen cohort. The original report mistakenly cited 108 graduates out of a cohort of 360 students for a graduation rate of 30%. This report was incorrect as it included transfer students. The IPEDS data was later revised and the final, published IPEDS report cited 98 graduates out of 304 students for a correct graduation rate of 32%. The 2008 report is certified and is public record. (Exhibit A) <http://nces.ed.gov/ipeds/datacenter/Facsimile.aspx?unitid=acacb3b0afac>

In 2010, Marymount California University became a Bachelor's degree granting institution offering both Bachelor's and Associate's degrees. As a "four-year" institution IPEDS required that we adopt a six-year degree completion rate. Consequently, in 2011 we again had to report the graduation rates for our 2005 cohort, even though no students from this cohort had yet received a Bachelor's degree from Marymount California University. They all had transferred on to other institutions in between 2005 and 2011. Naturally, the number of students who earned an Associate's degree from the original 2005 cohort had not changed, so the graduation rate was unchanged and remained 32%. Our first Bachelor's graduates were 2012 so they are not a factor in any of this reporting, even though we were required by IPEDS to adopt the six-year parameters in 2011.

Unfortunately when Marymount California University received the 2011 IPEDS Graduation Rate Survey the cohort data fields were pre-populated by IPEDS with the original, unrevised, 2008 data. Apparently this policy is systemic to IPEDS, as verified in the attached email. (Exhibit B) Our registrar that year did not catch this mistake by IPEDS and assumed, incorrectly, that the data was already revised and final. This is the reason our 2011 survey of the 2005 cohort incorrectly shows 108 graduates out of a cohort of 360 students for an incorrect graduation rate of 30%. (Exhibit C) <http://nces.ed.gov/ipeds/datacenter/Facsimile.aspx?unitid=acacb3b0afac>

Marymount California University has more than doubled its enrollment within the last four years, making access for deserving needy students from all over the state. The attached report (Exhibit D) shows that we currently serve 256 Cal Grant students. This cohort receives more than \$2M of Cal Grant aid and their families can contribute no more than \$1,267 on average to their student's education. Removing our Cal grant eligibility would be devastating to both our students and our University, as it would prevent 25% of our students from attending Marymount.

As you consider this appeal please recognize the evolving nature of our University, one that has decades of experience in preparing students for transfer to public and private universities. The attached report (Exhibit E) demonstrates our success in preparing students for Bachelor's degree attainment at other universities. Our new identity as a Bachelor's and, now, Master's degree granting institution means that a good number of our freshmen complete their bachelor's degrees at Marymount, but the evolving nature of our institution presents some difficulty in presenting our graduation story within a rigid IPEDs structure.

Exhibit A

Graduation rates

Calculation of 4-year average rates: cohort adjustment

Screen 1 of 3	2002	2003	2004	2005	4-year Total
Men					
Revised cohort (III.10)	186	172	182	142	682
Total exclusions (III.45)				0	0
Adjusted cohort	186	172	182	142	682
Women					
Revised cohort (III.10)	209	202	235	162	807
Total exclusions (III.45)				0	0
Adjusted cohort	209	202	235	162	807
Total (men and women)					
Revised cohort (III.10)	394	374	417	304	1,489
Total exclusions (III.45)				0	0
Adjusted cohort	394	374	417	304	1,489

Institution: Marymount College (118541)

Graduation rates

Calculation of 4-year average rates: completers within 150% of normal time

Screen 2 of 3	2002	2003	2004	2005	4-year Total
Men					
<2-yr completers (III.11)	39	6		42	87
2<4-yr completers (III.12)	11	65	43	0	139
Total completers within 150%	50	71	43	42	226
Women					
<2-yr completers (III.11)	47	4		56	107
2<4-yr completers (III.12)	9	138	74	0	221
Total completers within 150%	56	142	74	56	328
Total (men and women)					
<2-yr completers (III.11)	88	10		98	194
2<4-yr completers (III.12)	20	223	117	0	360
Total completers within 150%	106	233	117	98	554

Exhibit B

-----Original Message-----

From: IPEDS Email [mailto:ipedshelp@rti.org]
 Sent: Wednesday, December 04, 2013 11:50 AM
 To: Michael Semenoff; IPEDS Email
 Cc: Michael Brophy
 Subject: RE: Attention: Donald Hairston 118541

Hello Michael,

Yes, the 2011 Graduation Rate (GR) survey was auto populated with original data provided in the 2005 Fall Enrollment (EF) Survey of full time/first time students enrolled. Shown below is the page from 2005 EF containing those data. I copied this page from the original survey data in the IPEDS Data Center. Also, you are correct that in 2011 the opportunity to revise the initial cohort was available in GR but the same initial cohort data was used.

Enrollment 2005-06

Institution: Marymount California University (118541) Part A - Fall Enrollment by race/ethnicity and gender

Enrollment as of the institution's official fall reporting date or as of October 15, 2005

CIPCODE: 99.0000 -- Summary

Full-time undergraduate students

Students enrolled for credit Degree/certificate-seeking Non-degree/
 non-certificate-seeking

(4) Total,
 full-time
 undergraduate students

(5)
 First-time

(1) Other
 degree/certificate-
 seeking

(2) Total

(3)
 Men
 Nonresident alien 17 30 47 47
 Black, non-Hispanic 6 5 11 11
 American Indian/Alaska Native 1 0 1 1
 Asian/Pacific Islander 15 13 28 28
 Hispanic 17 25 42 42

12/05/13

Page 3

White, non-Hispanic	94	72	166	166
Race/ethnicity unknown	22	17	39	39
Total men	172	162	334	334
Total men prior year	171	330	330	
Women				
Nonresident alien	18	11	29	29
Black, non-Hispanic	8	8	16	16
American Indian/Alaska Native	1	0	1	1
Asian/Pacific Islander	9	18	27	27
Hispanic	42	41	83	83
White, non-Hispanic	78	75	153	153
Race/ethnicity unknown	32	33	65	65
Total women	188	186	374	374
Total women prior year	227	381	381	
Total men + women	360			

Please contact the Help Desk if you need further assistance.

Donald K. Hairston
 IPEDS Help Desk
 1-877-225-2568
ipedshelp@rti.org

-----Original Message-----

From: Michael Semenoff [<mailto:MSemenoff@marymountcalifornia.edu>]
 Sent: Wednesday, December 04, 2013 2:19 PM
 To: IPEDS Email
 Cc: Michael Brophy
 Subject: RE: Attention: Donald Hairston 118541

Hi Donald,
 Would you verify for me, per our conversation Monday 12/02/13, that in 2011 our graduation rate survey for our 2005 freshmen cohort was automatically populated with the original 2005 survey responses, not the revisions? I need to be certain that using original data is systemic to IPEDS. We had the opportunity in 2011 to revise again, but our reporter used the data provided within the IPEDS survey. I believe you verified this with a supervisor.
 Thanks.

Michael Semenoff
 Director of Research, Planning, and Assessment Marymount California University
 310-377-5501
msemenoff@marymountcalifornia.edu

Exhibit C

Graduation rates

Calculation of 4-year average rates: Cohort adjustment

Screen 1 of 3	2002	2003	2004	2005	4-year Total
Men					
Revised cohort (I,01)	142	134	171	172	619
Total exclusions (II,45)				0	0
Total exclusions (III,45)				0	0
Adjusted cohort	142	134	171	172	619
Women					
Revised cohort (I,01)	162	169	227	188	746
Total exclusions (II,45)				0	0
Total exclusions (III,45)				0	0
Adjusted cohort	162	169	227	188	746
Total (men and women)					
Revised cohort (I,01)	304	303	398	360	1,365
Total exclusions (II,45)				0	0
Total exclusions (III,45)				0	0
Adjusted cohort	304	303	398	360	1,365

Graduation rates

Calculation of 4-year average rates: Completers within 150% of normal time

Screen 2 of 3	2002	2003	2004	2005	4-year Total
Men					
<2-yr completers (II,11)				0	0
2<4-yr completers (II,12)				0	0
Bachelor's completers (II,18)				0	0
<2-yr completers (III,11)	42	40	40	2	124
2<4-yr completers (III,12)		15	22	40	77
Bachelor's completers (III,18)				0	0
Total completers within 150%	42	55	62	42	201
Women					
<2-yr completers (II,11)				0	0
2<4-yr completers (II,12)				0	0
Bachelor's completers (II,18)				0	0
<2-yr completers (III,11)	56	61	81	2	180
2<4-yr completers (III,12)		11	34	64	109
Bachelor's completers (III,18)				0	0
Total completers within 150%	56	72	95	66	289
Total (men and women)					
<2-yr completers (II,11)				0	0
2<4-yr completers (II,12)				0	0
Bachelor's completers (II,18)				0	0
<2-yr completers (III,11)	98	101	101	4	304
2<4-yr completers (III,12)		26	56	104	186
Bachelor's completers (III,18)				0	0
Total completers within 150%	98	127	157	108	490

Exhibit D

Term	Total Enrollment	# Cal Grant Recipients	Annual Aid	Average per Recipient	Average EFC
Fall 2005	708	96	\$746,870	\$7,780	\$964
Fall 2006	630	63	\$432,234	\$6,861	\$895
Fall 2007	656	67	\$394,866	\$5,894	\$849
Fall 2008	573	72	\$522,616	\$7,259	\$901
Fall 2009	561	73	\$563,000	\$7,712	\$545
Fall 2010	793	134	\$930,998	\$6,948	\$1,351
Fall 2011	940	196	\$1,559,754	\$7,958	\$913
Fall 2012	1001	229	\$1,822,734	\$7,960	\$1,049
Fall 2013	1037	256	\$2,240,352	\$8,751	\$1,267

Exhibit E

Term	# of entering 1st-time freshmen registered students	# earned		Average GPA of Transfer Out/No MCU degree	Average Units of Transfer Out/No MCU degree	# transfer		
		MCU degree	MCU degree			outs directly	# earning BA	% earning BA
Fall 2005	304	98	32%	2.37	34	117	84	72%
Fall 2006	306	112	37%	2.61	35	138	90	65%
Fall 2007	334	104	31%	2.57	35	142	84	59%

Data Sources : IPEDS, National Student Clearinghouse, MCU



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San Jose, CA 95127
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Exhibit 22.3

RECEIVED

2013 DEC 27 PM 12:28

CSAC
EXECUTIVE OFFICE

December 24, 2013

Diana Fuentes-Michel
Executive Director
California Student Aid Commission
P.O. Box 419026
Rancho Cordova, CA 95741-9026

Dear Ms. Fuentes-Michel:

This letter acknowledges and responds to your letter of November 15, 2013 regarding the Cal Grant Program Eligibility for The National Hispanic University (NHU). As we understand it, the California Student Aid Commission (CSAC) has determined that while NHU's current 3-year Cohort Default Rate (CDR) of 14.2% meets the eligibility standard, NHU has failed to meet the graduation rate criteria for continuing Cal Grant eligibility. Because NHU believes that this initial determination is in error, NHU is appealing the decision that it does not meet the graduation rate requirement for Cal Grant eligibility.

While the graduation rate (for first-time full-time undergraduates) at NHU in 2011 was 18%, the university placed significant resources and effort into financial counseling and student support services for its students entering in 2006 and thereafter, and, as a result, improved its graduation rate to 32% for 2012. This data was submitted by NHU to the U.S. Department of Education's National Center for Education Statistics and, according to the attached email, was locked on Sunday, April 7, 2013. We understand that the U.S. Department of Education has yet to post the most recent data on its website. However, we also note that during the period of October 1, 2013 through October 16, 2013 the Federal Government was officially shut-down which could have impacted the posting of the most current data on the agency's website. Using NHU's latest graduation rate of 32% for 2012, NHU meets the Cal Grant graduation rate requirement for eligibility.

As you may recall, NHU has been accredited by the Western Association of Schools and Colleges (WASC) since 2002. The mission of NHU is to help Hispanic students and members of other underrepresented groups pursue a high-quality postsecondary education. The university strives to create a student-centered environment that supports the success of Hispanic learners and those active in the Hispanic community. The university has a strong tradition of giving back to the Hispanic community. Finally, NHU works diligently to promote college success for at-risk



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students through a number of early intervention programs. As a result, NHU brings traditionally underserved students into the university classroom and prepares them for successful careers and positions of leadership. Without Cal Grant funding, a significant number of students would not be able to attend NHU and meet their personal and career goals.

In consideration of the above, NHU appeals to CSAC to reconsider its position that NHU has failed to meet one or both of the required thresholds since the most recent data clearly make NHU an eligible institution with a 32% graduation rate for 2012 and a three-year CDR of 14.2%. NHU requests that its Cal Grant eligibility from June 30, 2014 and thereafter be reinstated.

Thank you in advance for your consideration of our appeal.

Best regards,

Gladys N. Ato, Psy.D.
President and Provost

Cc: Diondrae Collier, Financial Aid Director

From: ipedshelp@rti.org
Sent: Sunday, April 07, 2013 4:20 PM
To: Isabel Vallejo
Subject: IPEDS Locking Confirmation for Graduation Rates - 119544

Categories: IPEDS

The survey component data for Graduation Rates for INSTITUTION: 119544 - The National Hispanic University was locked on Sunday, April 07, 2013. The U.S. Department of Education's National Center for Education Statistics would like to thank you for your participation in the 2012-13 IPEDS data collection. Please be sure to lock all applicable surveys for this collection period.

If you have any questions about your institution's reporting requirements, please contact the IPEDS Help Desk at 1-877-225-2568 or ipedshelp@rti.org.

IPEDS Help Desk
Toll Free 1-877-225-2568
ipedshelp@rti.org

http://www.mercurynews.com/opinion/ci_25011732/national-hispanic-university-board-determined-continue-serving-san?source=rss#

San Jose Mercury News

Opinion

National Hispanic University: Board determined to continue serving San Jose region

By Jonathan A. Kaplan and Edward Alvarez

Special to the Mercury News

Posted: 01/28/2014 02:27:45 PM PST | Updated: about 22 hours ago

The San Jose community has heard speculation about the future of National Hispanic University. We want to share directly with the community the view of NHU's Board of Directors.

Our board is made up of a broad range of education, business and non-profit leaders from around the country, as well as several leaders located here in Silicon Valley. We believe deeply in the mission of The National Hispanic University. NHU is proud of our collective history and journey to provide educational opportunities to students and the community of San Jose.

Part of our character has always been to face challenges head on — and NHU has faced serious financial challenges for many years. This is despite significant investments made by The NHU Foundation and Laureate Education over the years to provide our students with the support, resources, faculty, and infrastructure they need to be successful.

More recently, our challenges have been compounded by changes in the higher education environment and significant regulatory hurdles that limited our ability to offer new programs.

Making matters more difficult, in 2013 the U.S. Department of Education unexpectedly made a decision based on its interpretation of the Higher Education Act that our Liberal Studies program was no longer eligible for federal financial aid, impacting almost a quarter of NHU's students enrolled in one of our longest-standing programs.

While the Board of Directors respectfully disagreed with the Department, we complied fully with its interpretation. The Department's decisions to close off access to federal financial aid for Liberal Studies and to limit new programs were significant financial blows to NHU and to our students.

In light of these difficulties, the board is now evaluating the situation further and determining the best pathways for NHU's future, including how we continue to serve the San Jose community and how to ensure our current students achieve educational success.

Given our uncertain situation, we have made the responsible decision not to enroll any new students at this time.

So where do things stand today?

Consistent with our desire for transparency and in the spirit of familia, NHU's president, Dr. Gladys Ato, and our administration have been informing and meeting with students and members of the community, and will continue to do so.

Within the next two months, our board and the school leadership will determine the best pathway forward, with our students' educations and the community's needs at the forefront. We don't know yet what that final plan is, but we know that continued engagement with our community will help us make the right decisions.

Jonathan A. Kaplan is chairman of the National Hispanic University board. Edward Alvarez is a board member and is chairman of the NHU Foundation Board. They wrote this for this newspaper.



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Fax: 408.254.1369

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January 10, 2014

Diana Fuentes-Michel
Executive Director
California Student Aid Commission
P.O. Box 419026
Rancho Cordova, CA 95741-9026

Dear Ms. Fuentes-Michel:

This letter supplements my original letter of December 24, 2013 regarding the Cal Grant Program Eligibility for The National Hispanic University (NHU). In that letter, NHU appealed the decision of the California Student Aid Commission (CSAC) that NHU failed to meet the graduation rate criteria for continuing Cal Grant eligibility. As noted in that letter, NHU has placed significant resources and effort into financial counseling and student support services for its students and as a result improved its graduation rate to 32% for 2012. This rate was reported by NHU through IPEDS in April 2013. This most current rate has now been posted by the U.S. Department of Education, confirming NHU's overall graduation rate at 33% (see link below). Accordingly, NHU has demonstrated that it meets all criteria for continuing Cal Grant eligibility. Clearly, NHU is making progress in this area and it would be important for CSAC to recognize this increase in performance for the sake of the students who are dependent on these funds to continue their education.

Again, we thank you in advance for your consideration of our appeal.

Best regards,

Gladys N. Ato, Psy.D.
President and Provost

cc: Diondrae Collier, Financial Aid Director

<http://nces.ed.gov/ipeds/datacenter/SnapshotX.aspx?unitId=acacb4b0afaf>

IPEDS Data Center | [About IPEDS](#)

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The Integrated Postsecondary Education Data System

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Look up an institution

Provisional Release Date: 1/20/14

1. Select Institution

My Comparison Institution: **None Selected**

Select Institution(s)

How would you like to select institutions to include in your data file/report?

By Name of Institution By Group By Location Customized file

The National Hispanic University [Change institution](#)

Institution Profile [Reported Data](#) [Data Feedback Reports](#)

General Information

Financial Aid & Loan Resources

Student Financial Aid

Enrollment

Creditability Rates

Criteria for Reporting: First-time, degree-seeking, testing undergraduate

Overall graduation rate: 20%

Creditability rates within 150% of normal time to program completion, 2012

Min	33
Median	33
American Institute of Higher Education	
2009	
First-time graduation rate	24
Retention rate for first-time freshmen	0
Transfer rate	
Retention rate for transfers	
Retention rate for...	

Awards/Programs Completed

U.S. Department of Education
Institute of Education Sciences
National Center for Education Statistics

IPEDS Data Center | [About IPEDS](#)

U.S. DEPARTMENT OF EDUCATION
 INSTITUTE OF EDUCATION SCIENCES
 NATIONAL CENTER FOR EDUCATION STATISTICS

IPEDS DATA CENTER

11 STATISTICS

11/20/14 11:40 AM

CHARLES R. DREW UNIVERSITY OF MEDICINE AND SCIENCE

1731 East 120th Street
 Los Angeles, California 90059
 Office of the President



RECEIVED
 2013 DEC 24 AM 11:16
 CSAC
 EXECUTIVE OFFICE

December 13, 2013

Diana Fuentes-Michel
 Executive Director
 California Student Aid Commission
 PO Box 419026
 Rancho Cordova, CA 95741-9026

Dear Ms. Fuentes-Michel:

Charles R. Drew University of Medicine and Science (CDU) received your notice of November 15, 2013, which stated that our institution would no longer be eligible to utilize Cal Grant funds for our students, starting July 1, 2014. From that notice, we understand that CDU did not meet the eligibility standard for graduation rates, but did meet eligibility requirements for loan default rates. While well-intended to improve Cal Grant program outcomes, we feel that the methodology adopted by CSAC has adversely and unintentionally affected CDU in ways that were not anticipated when that methodology was adopted.

This letter is therefore an appeal for a review of that determination, based upon the following factors:

- CDU's graduation rates of less than 30% are based on extremely small cohorts of first-time/full-time freshman, 9 in 2005 and 4 in 2006. This sample is not representative of CDU's graduation outcomes, and leads to very high fluctuation in reported graduation rates.
- CDU currently has 23 students receiving Cal Grant funds among our 83 undergraduates. Of the 23, just 3 started as first-time/full-time freshmen. Losing Cal Grant funds disproportionately impacts students whose outcomes are not part of the eligibility calculus.
- CDU has closed several low enrolled, high attrition programs and continues to do so. Half of first-time/full-time students in the 2005/06 IPEDS cohort were enrolled programs which have been closed.
- CDU's graduation rates for undergraduates overall, and Cal Grant recipients specifically, are strong.

(Please see the enclosed Appendix for additional detail on each of these items.)

CDU is planning to significantly increase its undergraduate enrollment at a time when many of California's universities are capping or even reducing such enrollment levels. We seek to do so to offer expanded educational opportunity to students from South Los Angeles, many of whom come from under-served and under-resourced communities. Many of these students will seek to pursue needed careers in the health professions, our University's specific area of focus. The decision by the CSAC has the unfortunate effect of instead curtailing our University's ability to offer this expanded access to post-secondary educational opportunity for students from our community.

As a result, CDU is asking the CSAC to reconsider its decision that University be ineligible for participation in the Cal Grant program. One potential approach would be to establish a minimum number of first-time/full-time students as a threshold for the application of the graduation rate criterion. I am specifically requesting a meeting with you during the first week of January to discuss this matter further. I can be reached at (323) 563-4987 or by e-mail at davidcarlisle@cdrewu.edu. Thank you for your consideration.

Best regards,

A handwritten signature in blue ink, appearing to read "David M. Carlisle", is written over the typed name.

David M. Carlisle, MD, PhD
 President and CEO

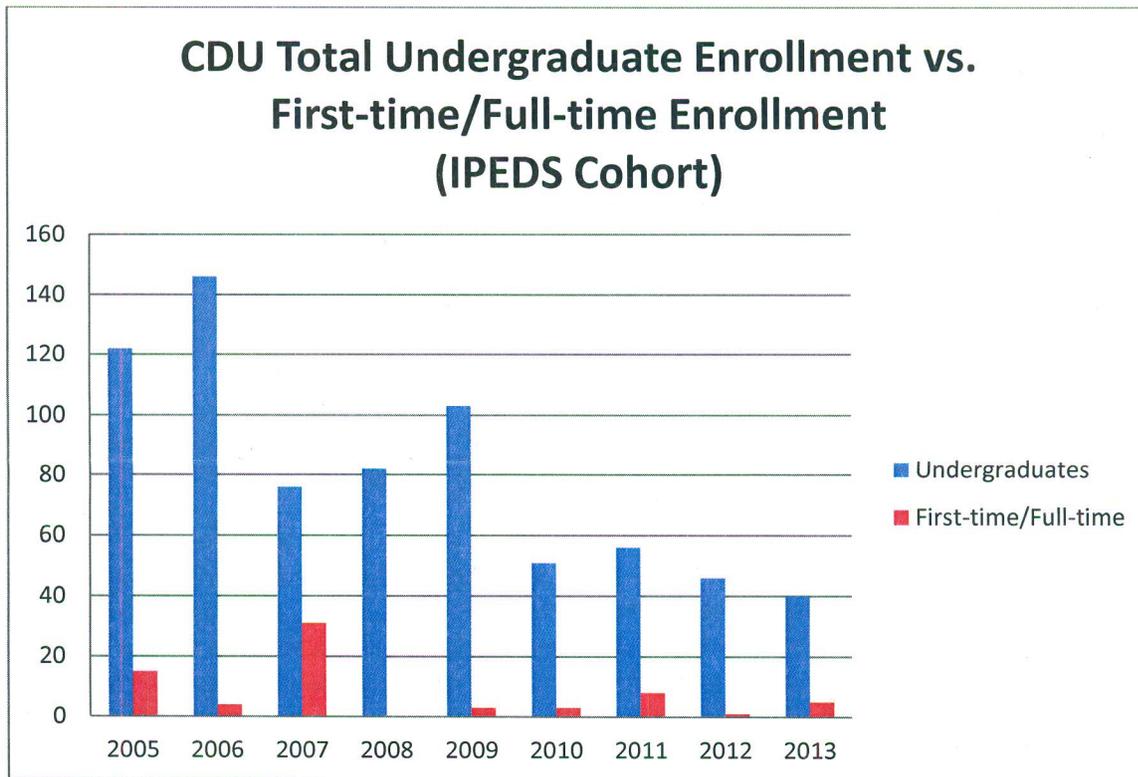
California Student Aid Commission
 Enclosure

February 20-21, 2014

Appendix to CSAC Appeal
 Charles R. Drew University of Medicine and Science
 December 2013

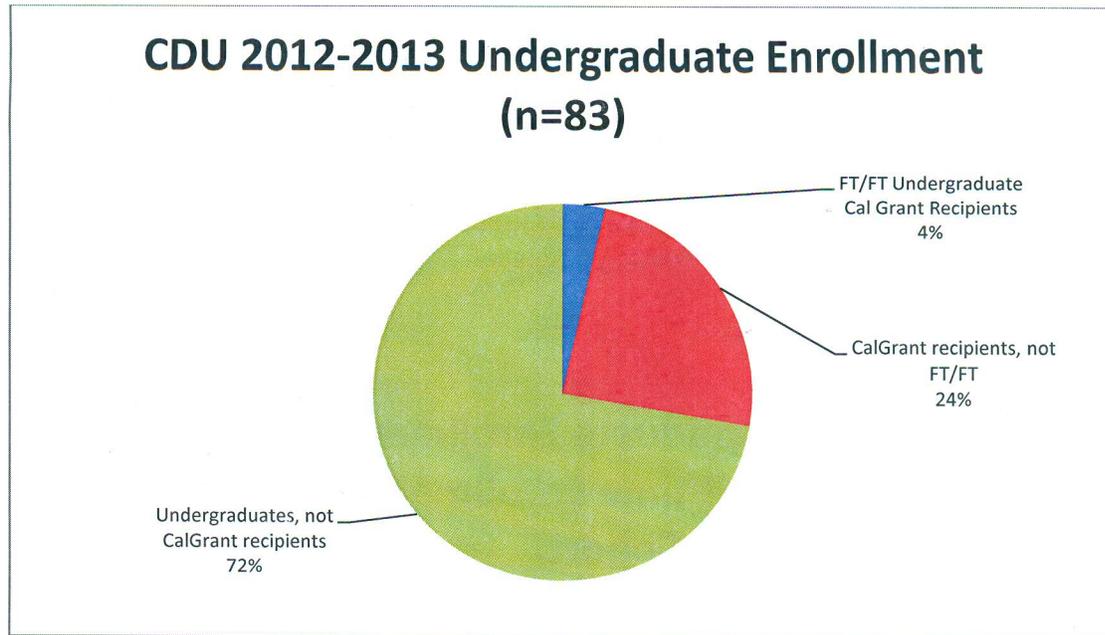
- **CDU's graduation rates of less than 30% are based on extremely small cohorts of first-time/full-time freshman, 9 in 2005 and 4 in 2006. This sample is not representative of CDU's graduation outcomes, and leads to very high fluctuation in reported graduation rates.**

The graduation rates used by CSAC to determine eligibility are based on the Integrated Post-Secondary Data System (IPEDS) 150% first-time/full-time degree or certificate seeking student cohort. The IPEDS cohort definition encompasses a very small percentage of CDU undergraduates, and results in extremely small cohorts of first-time/full-time freshman, 9 in 2005 and 4 in 2006. Because the sample size is so low, the graduation rates calculated are subject to extreme variability, ranging from 0% to 100% from year to year. Additionally, this sample is not representative of CDU's undergraduate enrollment, which is focused primarily on students entering health professions programs as transfers, or as career changers with prior academic experience. Potential approaches to address this issue could include having a minimum threshold of first-time/full-time students in a cohort used for calculating graduation rate, or using the graduation rate of only Cal Grant recipients at an institution.



- **CDU currently has 23 students receiving Cal Grant funds among our 83 undergraduates. Of the 23, just 3 started as freshmen. Losing Cal Grant funds disproportionately impacts students whose outcomes are not part of the eligibility calculus.**

Losing access to Cal Grant funds disproportionately impacts students whose outcomes are not part of the eligibility calculus. Using the IPEDS 150% first-time/full-time undergraduate graduation rates as the basis for Cal Grant eligibility effectively places the vast majority of Cal Grant students at risk for the outcomes of a very small sample of students.

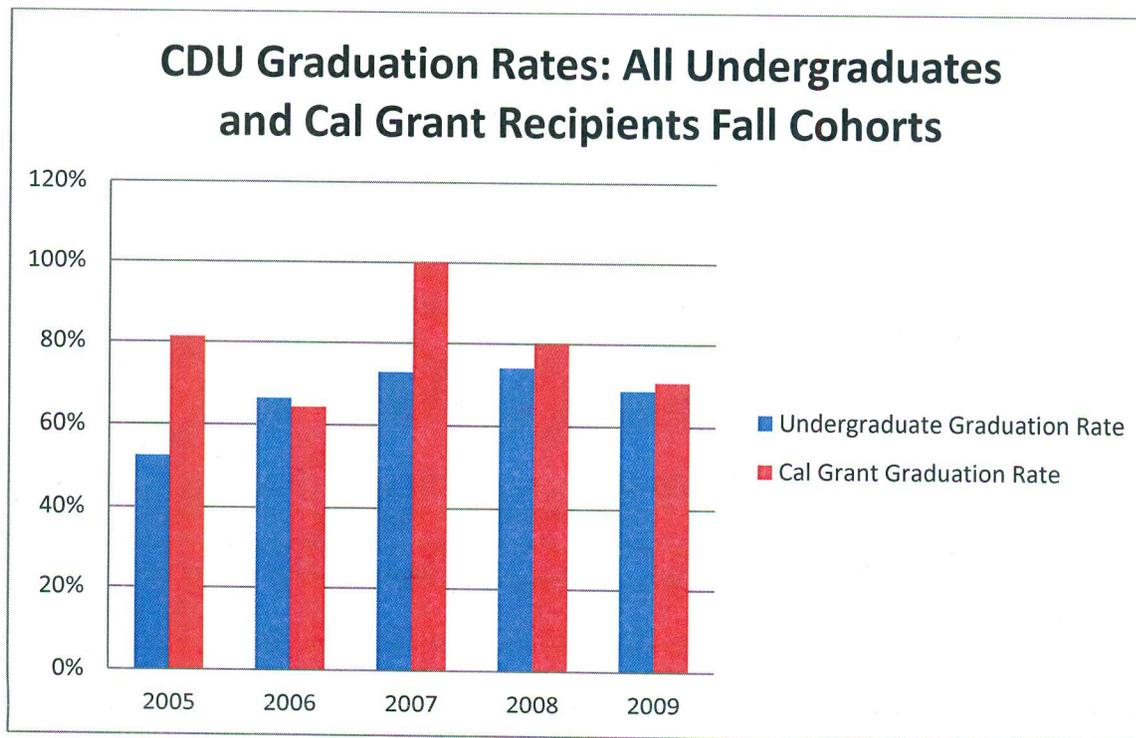


- **The University has closed several low enrolled, high attrition programs and continues to do so. Half of first-time/full-time students in the 2005/06 IPEDS cohort were enrolled programs which have been closed.**

CDU has an active program of review for academic programs, and has demonstrated that programs that are not achieving their academic goals may be closed or substantially reconfigured to ensure excellent student outcomes. In March 2013, the Health Information Technology program was placed on teach-out due to poor program completion rates. CDU has also reduced the number of programs with highly variable, and very low enrollment, which has increased the stability of program enrollments and outcomes.

- **CDU’s graduation rates for undergraduates overall, and Cal Grant recipients specifically, are strong.**

Although the results of first-time/full-time freshman graduation at CDU have fluctuated over time, due to the small number of entering freshmen, our graduation rates for undergraduates, overall, are very high. CDU’s 150% graduation rates for all undergraduates (primarily transfer students or prior degree holders) over the last 5 years demonstrate consistently high rates of graduation, particularly when the predominantly minority student population of the university is considered. The chart below shows the history of undergraduate completions at CDU displayed with the rates of those students who received Cal Grants. As the chart shows, the completion rates of Cal Grant recipients is not only at least 60%, but it is higher than the overall rate in all but one year. If the graduation rates used for eligibility in the Cal Grant program only took into consideration the outcomes of Cal Grant student (as recommended by the 2013 report of the Legislative Analyst’s Office¹) CDU would clearly remain eligible for the Cal Grant program.



We believe that our strength in completing undergraduates, generally, demonstrates our ability to successfully educate undergraduate students, including the socioeconomically disadvantaged students who receive Cal Grants.

¹ Taylor, M. (2013) An Analysis of New Cal Grant Eligibility Rules. LAO Reports. Sacramento, CA