



Comments to the California Community College Board of Governors Regarding the MOU with American Public University System (APUS)

My name is Angela Perry, and I am an Associate Director of Policy & Advocacy at The Institute for College Access and Success (TICAS). Thank you President Hayes and members of the board so much for the opportunity to offer comments on the Memoranda of Understanding between the Community College Chancellors Office (CCCCO) and American Public University System (APUS) and their affiliate American Military University (AMU).

TICAS is sympathetic to the reality that California Community College students face barriers in transferring to other public colleges within California. Because the most popular majors at our public universities are often impacted, place-bound students in many parts of the state have limited public options when transferring. We understand that the CCCCCO desires to expand high-quality transfer partnerships, however, we feel strongly that the CCCCCO should not be encouraging students to transfer to APUS.

As an out-of-state institution, APUS is not eligible for CalGrant and other state aid programs. As an online for-profit institution, it is registered with but not approved by the Bureau for Private Postsecondary Education. This means that California has limited authority over APUS, and APUS is not required to follow many of California's laws that govern in-state private postsecondary institutions. In fact, it appears that American *Public* University and American *Military* University would not comply with California's laws governing private postsecondary institutions; for-profit institutions are prohibited in California from falsely misrepresenting themselves as public institutions, or falsely representing themselves as having a military affiliation.

Most importantly, we believe that the information APUS provided to the CCCCCO was missing vital information relating to APUS and AMU's history of misleading marketing to veterans. In 2018, the Massachusetts Attorney General announced a settlement with APUS over allegations that AMU failed to make required disclosures to prospective students about job placement, loan repayment, and graduation rates. The AG also alleged that AMU engaged in "predatory enrollment tactics, including making excessive recruitment calls," and that AMU's "name and other visual images suggest it is part of the United States Armed Services, but the company in fact is not part of the U.S. Military and is not affiliated with it."

We believe that the information provided by APUS in the KPIs document did not provide the CCCCCO a complete picture regarding the institution, its performance, and risks of fraud and abuse. We therefore believe the CCCCCO should terminate this agreement, and take steps to create clear criteria for future MOUs that provide high quality educational opportunities and outcomes for California's students. Thank you again for your time and attention