

## California Community College Chancellor's Office's Board of Governors Meeting

Comment of Angela Perry, Director of Policy & Advocacy  
The Institute for College Access & Success (TICAS) January 24, 2022

Good afternoon, my name is Angela Perry, Director of Policy & Advocacy at The Institute for College Access & Success (TICAS). Thank you, President Hayes and members of the Board, so much for the opportunity to offer comments on the proposed changes to the Board Policy guiding the CCCC approach to entering into transfer agreements with institutions.

TICAS is sympathetic to the reality that California Community College (CCC) 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, and we appreciated Vice President Costa's comments regarding the need to proactively identify high-quality transfer options for CCC students.

We were deeply concerned that the MOU with APUS contradicted the CCC's overarching goals to ensure equitable educational outcomes and put students at risk, and we are sincerely glad to hear that the agreement will be dissolved going forward.

However, APUS is not the only institution that potentially poses a risk to students, and we believe that additional safeguards must be put in place to ensure students have access to high-quality educational opportunities that lead to brighter futures and do not leave them with unmanageable debt. We have submitted public comments recommending additional policies for consideration that would adequately protect students and provide assurances to Board members that students will be protected. We have recommended that the CCCC focus on agreements with in-state public and nonprofit institutions, require that institutions be accredited and eligible for Title IV and Cal Grant funding, and pass the Attorney General's check for institutions as established in A.B. 70 mentioned by member Epstein. Criteria should also prohibit agreements with for-profit institutions operating online from out-of-state, given the high risk, limited oversight, and reduced consumer protection presented by these institutions. Finally, we recommend that the CCCC explore the possibility of data sharing agreements rather than MOUs where additional data on student outcomes is desired, and that the use of CCC branding be limited and closely monitored.

We appreciate the addition of a policy to require Board approval of an MOU with for-profit colleges. We also encourage the Board and CCCC to further refine this proposed policy to ensure a more thorough review of institutions prior to bringing MOUs to the Board for approval.

We look forward to continued collaboration with the CCCC and Board on these issues. Thank you again for your time and attention, and for the thoughtful discussion on this topic today.