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Title 5. Education
Division 4. California Student Aid Commission
Chapter 1. California Student Aid Commission
Article 4.5. Cal Grant Program Appeal Process and Appeal Criteria

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Appendix A CSAC APPEAL CERTIFICATION FORMCurrentness

Purpose: The purpose of this form is to certify institutions, who have lost eligibility during the certification process, and wish to appeal with the commission in accordance with California Education Code 69432.7. Use this form to determine if your institution is qualified to appeal based on your cohort default rate and/or graduation rate.

Instructions: Please make sure all fields are completed. If qualified, send this form with a formal letter of request to appeal along with supporting documents. If you select NO at any point, your institution is not qualified to appeal. If you determine your institution is not qualified based on this form, no further action is required.

Institution Name: Columbia College HollywoodOPE ID: 021102-00Contact: Jason Cupp Email: jcupp@columbiacollege.eduPhone: (323) 804-8789

Please certify and complete the following:

1. My institution remains eligible for Title IV programs: ☒ Yes / ☐ No
2. My institution's cohort in question is 20 students or less for academic year 2017: ☐ Yes / ☒ No
3. My overall institution Grad Rate for academic year 2021 is above 30% ☒ Yes / ☐ No / ☐ N/A
4. The number of students that are listed on your roster for the current academic year: N/A
5. The number of students that have received payment on your roster for the current academic year: N/A

6. Attach a formal letter of appeal on school letterhead and include supporting documentation that you will use for your appeal. I understand the commission is bound by the California Education Code 69432.7 and related regulations and is not permitted to make any exceptions for any reason for institutions that do not meet the statutory criteria for granting an appeal. ☒ Yes / ☐ No

Print Name: William M SmithDate: December 13, 2022Signature: 

(Should be signed by the official who signed the Institutional Participation Agreement)

Credits**HISTORY**

1. New Appendix A filed 9-21-2021; operative 1-1-2022 (Register 2021, No. 39). Filing deadline specified in Government Code section 11349.3(a) extended 60 calendar days pursuant to Executive Order N-40-20 and an additional 60 calendar days pursuant to Executive Order N-71-20.

This database is current through 12/23/22 Register 2022, No. 51.

Cal. Admin. Code tit. 5, Div. 4 Ch. 1 Art. 4.5 App. A, 5 CAADC Div. 4 Ch. 1 Art. 4.5 App. A

END OF DOCUMENT

COLUMBIA COLLEGE HOLLYWOOD

November 1, 2022

OPE ID: 02110200

Tae Kang
Deputy Director
Program Administration & Services Division
California Student Aid Commission

**Re: Columbia College Hollywood
Eligibility for Cal Grant Participation 2023-24**

Dear Deputy Director Kang,

This letter is a follow-up to our prior ineligibility status to participate in the Cal Grant program and serves as Columbia College Hollywood's (CCH) request for eligibility reconsideration pursuant to California Education Code section 69432.7(l)(3)(I)(iv)(I) for the 2023-24 academic year.

I. CCH's Prior Ineligibility

On December 2, 2020, the Commission deemed CCH ineligible for the 2021-22 academic year based on our Cohort Default Rate (CDR) released in 2020 of 15.9%. On December 23, 2020, CCH respectfully requested the Commission exercise its appeal authority and reinstate CCH's eligibility. The Commission denied CCH's request on March 2, 2021.

CCH reapplied for Cal Grant program participation for the 2022-23 academic year given that we met participation eligibility requirements—CCH's 2021 released CDR was 0.0%. However, on November 19, 2021, the Commission communicated that pursuant to an amendment to the Code by Governor Newsom on September 23, 2021, the Commission was directed to use the 2020 CDR for an otherwise qualifying institution in determining eligibility for the 2022-23 academic year. CCH was therefore unable to offer Cal Grant funding to many of our need-based students in a year where we would have been otherwise eligible.

II. Request for Reconsideration for 2023-24 Academic Year

Governor Newsom signed AB 190 into law on September 27, 2022, which provides in relevant part:

(III) Notwithstanding subclause (II), the commission may grant an appeal for the 2023–24 academic year if the institution failed to meet the three-year cohort default rate solely due to acquisition of an out-of-state institution that impacted its three-year cohort default rate, and the acquired out-of-state institution has since closed any time between the 2019–20 to 2022–23 academic years, inclusive. The institution's Cal Grant eligibility shall not be transferrable if the institution is bought or sold during the 2023–24 fiscal year. This authority shall be in effect for an appeal for the 2023–24 academic year only and shall sunset on July 1, 2023. The institution's Cal Grant eligibility shall not be transferrable to a new site acquired by the institution.

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columbiacollege.edu

COLUMBIA COLLEGE HOLLYWOOD

As explained in detail below, CCH did not meet the Commission's required 15.5% CDR for the 2021-22 academic year solely due to a 2018 acquisition of an out-of-state (Illinois) institution, which impacted the college's CDR. CCH's Illinois campus (Flashpoint Chicago) closed on August 9, 2022. As such, CCH respectfully requests that the Commission exercise its appeal authority under California Education Code section 69432.7(l)(3)(I)(iv)(I) and reconsider CCH's eligibility for the 2023-24 academic year.

A. CCH Failed to Meet the 2020 Certification Due to Acquisition of Out-of-State Institution

In 2018, CCH acquired a branch campus in Chicago, Illinois - Flashpoint Chicago. At the time of the acquisition, 38 of the eventual 42 total defaulters from the Chicago campus were already in defaulted status. CCH was proactive in utilizing Wright International Student Services (WISS) as an outside default prevention service. Despite the efforts of WISS and CCH in trying to cure delinquent borrowers, four additional Illinois students and four California students defaulted by the end of the cohort tracking period—resulting in a total of 46 defaulted borrowers. Of these 46 defaulted borrowers (out of 289 total borrowers), 42 were from the Illinois campus. If the campuses were separated out, CCH's 2020 released CDR would have looked like this:

<u>Campus</u>	<u>Defaulters</u>	<u>Total Borrowers</u>	<u>Percentage</u>
California	4	99	4%
Illinois	<u>42</u>	<u>190</u>	22%
Combined	46	289	15.9%

The 42 Illinois defaulted borrowers were inherited because of our acquisition of an out-of-state institution. As demonstrated in the chart above, CCH failed to meet the 2020 released CDR solely due to the acquisition of the Illinois campus. Without the borrowers from the Illinois campus, CCH would have had a 4% CDR for 2020, well below the Commission's 15.5% CDR eligibility requirement. Moreover, CCH's 2021 CDR was 0.0%, and our 2022 CDR is 0.0%.

II. CCH's Acquired Out-of-State Institution is Closed

September 8, 2022 was the last day the institution provided any instruction at the CCH's Illinois campus. As required under California Education Code section 69432.7(l)(3)(I)(iv)(I), CCH's acquired out-of-state institution (which impacted the CDR) closed within the 2022-23 academic year.

III. Conclusion

The defaulted borrowers CCH inherited as a result of the acquisition of an out-of-state institution was the sole reason CCH did not meet the Commission's 15.5% CDR requirement for the 2021-2022 academic year. Without the out-of-state institution acquisition, CCH's CDR would have been 4%. CCH's Illinois campus closed within the 2022-23 academic year on August 9, 2022. Therefore, CCH has met the requirements set forth in California Education Code section 69432.7(l)(3)(I)(iv)(I), and respectfully

COLUMBIA COLLEGE HOLLYWOOD

requests that the Commission exercise its appeal authority and reconsider CCH's eligibility to participate in the Cal Grant program for the 2023-24 academic year.

CCH understands that the authority for this specific and limited appeal is only in effect for the 2023–24 academic year. After which, the college must meet the Commission's eligibility criteria of a three year cohort default rate below 15.5% and a graduation rate above 30%. CCH has consistently met the graduation requirement, and we are confident that our internal efforts at the California campus will continue to result in a CDR well below the 15.5% threshold.

Please let us know if there is any documentation needed or additional questions we can answer to support our request. We thank the Commission for your time and consideration on this very important matter for Columbia College Hollywood.

Best regards,



William M. Smith
President & CEO
Columbia College Hollywood
Flashpoint Chicago
Tel: (818) 401-1288
Email: bsmith@columbiacollege.edu

cc: Greg Bublitz, Chief Financial Officer, Columbia College Hollywood
Jason W. Cupp, EdD, Director of Financial Aid, Columbia College Hollywood

RE: [External]Follow-Up on Eligibility Status for Columbia College Hollywood (OPEID 021102)

csac ipa <csacipa@csac.ca.gov>
To: Jason Cupp <jcupp@columbiacollege.edu>

Fri, Dec 2, 2022 at 2:45 PM

Good afternoon Jason,

Your appeal will be heard at the March 2023 Commission meeting along with any other schools that are appealing for the 2023-24 academic year. The commission has a formal appeal process for schools that meet certain conditions, please refer to the [California Code of Regulations, Article 4.5 – Cal Grant Program Appeal Process and Appeal Criteria](#) for specific details. Your situation is unique and is not listed on the form you have to fill out as this law is only applicable for this year and therefore not listed, but please fill it out anyway. If there are other documents or materials that you want to present to the Commission for your appeal besides the letter you sent previously, please provide those to us no later than the end of this month, 12/31/2022.

Do not hesitate to reach out if you have any questions.

Best,

Institutional Support Unit

California Student Aid Commission

csacipa@csac.ca.gov

Phone: (888) 294-0153

Website: www.csac.ca.gov

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From: Jason Cupp <jcupp@columbiacollege.edu>

Sent: Tuesday, November 22, 2022 8:49 AM

To: csac ipa <csacipa@csac.ca.gov>

Subject: [External]Follow-Up on Eligibility Status for Columbia College Hollywood (OPEID 021102)

CAUTION: External Email. Do not click links or attachments unless you recognize the sender and know the content is safe.

Hello,

I am following up on a request that was submitted on November 1st regarding reinstatement of eligibility for Columbia College Hollywood (OPEID 021102). Can you please confirm that you received this correspondence and let us know when institutions should expect to receive a response for an appeal?

Thank you,

Jason W. Cupp, EdD

pronouns: he/him/his

Director of Financial Aid

Columbia College Hollywood | [18618 Oxnard Street](#) | [Los Angeles, CA 91356](#)

Flashpoint Chicago, A Campus of CCH | [430 S. Michigan Avenue](#) | [Chicago, IL 60605](#)

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