

Michelle Dean  
 California Student Aid Commission  
 11040 White Rock Road  
 Rancho Cordova, CA 95670

January 31, 2020

Re: 20-21 Cal Grant Eligibility Appeal for West Coast University (036983)

Dear Ms. Dean,

This appeal letter is in response to the communication we received on January 24, 2020 in regards to West Coast University becoming ineligible for Cal Grant for the 2020-2021 academic year. West Coast University has three campuses in California – Los Angeles (main campus), Anaheim and Ontario (branch campuses). CSAC has provided one approval for all three campuses and all three campuses share accreditation and state approval.

CSAC's criteria for Cal Grant eligibility is stated as follows:

"Cal Grant participating colleges, universities, and career technical schools must meet various eligibility requirements in law to be able to receive Cal Grants. The two required thresholds\* for the 2020-21 academic year are:

1. Schools must keep their federal student loan Cohort Default Rate (CDR) below 15.5 percent; and
2. Schools must keep their graduation rate above 30 percent."

West Coast University's institutional CDR is 2.6%. The combined graduation rate for WCU-LA, WCU-Anaheim and WCU-Ontario is 39%. However, reviewing the data on CSAC's Ineligible Schools Cal Grant for 2020-2021 list it appears that CSAC certified USDOE 2018 Graduation rates using only the data for our main campus (WCU-LA).

Below is the table including the First-Time, Full-Time graduation data for all three campuses:

Campus	First-Time, Full-Time Undergraduates	Graduated within 150%	Graduation Rate
Los Angeles	12	2	17%
Anaheim	22	8	36%
Ontario	15	9	60%
<b>Total</b>	<b>49</b>	<b>19</b>	<b>39%</b>

Considering that CSAC has always approved WCU on institutional basis, the graduation rate should be combined for the institution as only 24% of first-time full-time undergraduates in the cohort are from the Los Angeles campus and yet the graduation rate criteria is based on cohort of students from a single campus.

In addition, most of the students enrolled at West Coast University have attended other postsecondary institutions prior to WCU and have credits from other institutions that they transfer into their programs at WCU. The USDOE only considers first-time full-time students when calculating the graduation rate for each campus. Therefore, the number of eligible students to be considered in the calculation is not reflective of WCU's student population as all transfer students are excluded.

Only 12 out of 1,260 students enrolled in the Los Angeles campus in the Fall 2012 cohort (*less than 1%*) are first-time full-time students used in the calculation of the graduation rate above. Below please find the same table that includes all students in the Fall 2012 cohort and not just first-time full-time students.

Please note that *first-time, full-time students are only 1% of the entire student population at West Coast University overall.*

Campus	All Undergraduates	Graduated within 150%	Graduation Rate
Los Angeles	1,260	977	78%
Anaheim	1,416	1,146	81%
Ontario	1,006	765	76%
<b>Total</b>	<b>3,682</b>	<b>2,888</b>	<b>78%</b>

Based on the reasons above, we ask that CSAC reinstate eligibility for WCU for 2020-2021 academic year so that WCU's students at all California campuses continue to have financial support using state funds while attending WCU.

If you have any questions, please do not hesitate to contact me or Marilyn Faller, Vice President of Financial Aid at 949-783-4026 or email [mfaller@westcoastuniversity.edu](mailto:mfaller@westcoastuniversity.edu).

Sincerely,



Jeb Egbert  
President  
West Coast University