Date of Hearing: June 24, 2025

ASSEMBLY COMMITTEE ON HIGHER EDUCATION Mike Fong, Chair SB 790 (Cabaldon) – As Amended May 6, 2025

[Note: This bill is double-referred to the Assembly Committee on Business and Professions and will be heard by that Committee as it relates to issues under its jurisdiction.]

SENATE VOTE: 34-0

SUBJECT: Postsecondary education: postsecondary education coordinating entity: interstate reciprocity agreements for distance education: out-of-state postsecondary educational institutions

SUMMARY: Requires the Governor to designate a state agency, department, or office as the principal state operating and coordinating entity for postsecondary education, with specified duties, including, but not limited to, implementation of an interstate reciprocity agreement for reciprocity agreement for the authorization and oversight of distance education, as the portal entity, if the Governor enters into an interstate reciprocity agreement. Specifically, **this bill**:

Higher Education Coordinating Body

- 1) Strikes the California Postsecondary Education Commission (CPEC) from the Education Code.
- 2) Requires the Governor to designate a state agency, department, or office as the principal state operating and coordinating entity for postsecondary education, with all of the following duties:
 - a) Implementation, coordination, and evaluation of the Master Plan for Career Education;
 - b) Coordination and evaluation of postsecondary implementation of intersegmental state policies and initiatives, including, but not limited to, College and Career Access Pathways and other dual enrollment programs, the Golden State Pathways Program, the Regional K-16 Education Collaborative Grant program, and the California Cradle-to-Career Data System; and,
 - c) Implementation of an interstate reciprocity agreement for distance education as the portal entity if the Governor enters into an interstate reciprocity agreement, as specified.
- 3) States Legislative intent that the portal entity adopt as many of the duties and responsibilities of the former CPEC, created in current law, as it read on December 31, 2025.

State Authorization Reciprocity Agreement for Distance Education

4) Authorizes the Governor to enter into one or more interstate reciprocity agreements through a compact on behalf of the state, upon issuing a written finding of all the following:

- a) The interstate reciprocity agreement and its implementation will not interfere with, and does not affect, the authority of the Attorney General (AG) or any other state or local agency to enforce any statutes or regulations prohibiting consumer fraud and unfair or deceptive business practices or the authority of the state to suspend or terminate the operation in the state of any entity subject to the interstate reciprocity agreement provided in state law;
- b) The interstate reciprocity agreement does not prevent the AG or any other state or local agency from applying and enforcing state law with respect to out-of-state postsecondary educational institutions that participate in the reciprocity agreement;
- c) The interstate reciprocity agreement allows the state, despite any reciprocal authorization, to require an out-of-state postsecondary educational institution, upon providing notice of at least six months, to register, pay fees, and be subject to the related state law to protect students, prevent misrepresentation to the public, or prevent the loss of funds paid from public resources or student tuition;
- d) The interstate reciprocity agreement does not apply to a course offered onsite to students at a military installation in the state, even if the course at the physical location is offered to students at other locations;
- e) The commission and national coordinating council are committed to preserving standards and protections that have been promulgated by the federal government and are the basis of the interstate reciprocity agreement, even if those standards or protections are subsequently diminished or withdrawn by the federal law or action of the United States Department of Education (USDE), and the commission is committed to developing meaningful performance metrics and frameworks for best practices with regard to individual state authorization activities;
- f) Within one year of the effective date of the state's entry into the interstate reciprocity agreement, the Bureau for Private Postsecondary Education (Bureau) will establish a process to ensure that postsecondary educational institutions exempt from the Act can participate in the interstate reciprocity agreement without impacting the postsecondary educational institution's exempt status;
- g) Participating states have the necessary authority and resources to investigate complaints and take appropriate action;
- h) The reciprocity agreement does not prohibit the state from accepting complaints from California students that have not first been submitted to the institution that is the subject of the complaint;
- i) The interstate reciprocity agreement does not delegate independent legal authority over the state or its participating postsecondary educational institutions to any other entity or otherwise authorize assumption of that legal authority by any other entity other than the state or its subdivisions, including by providing any nonstate entity with the authority to reverse or veto a decision by the state to suspend or terminate an in-state's institution's certification to participate in a reciprocity agreement; and,

- j) The interstate reciprocity agreement may be modified by the commission only with the approval of the Governor.
- 5) Requires, following issuing the findings required by 4) above, a joint hearing on the agreement held by the Assembly Committee on Business and Professions, the Assembly Committee on Higher Education, the Senate Committee on Business, Professions and Economic Development, and the Senate Committee on Education at which a representative from the commission will testify and members of the public shall be encouraged to testify on the agreement and the Governor's written findings.

Approval to operate under the reciprocity agreement

- 6) Authorizes a postsecondary educational institution to apply to the portal entity for approval to operate under an interstate reciprocity agreement using a standard application developed in accordance to the interstate reciprocity agreement.
- 7) Authorizes the portal entity to establish a reasonable fee as specified to be paid by a participating postsecondary educational institution.
- 8) Requires the portal entity to enter into a memorandum of understanding (MOU) with the University of California (UC) President upon resolution by the UC Regents, California State University (CSU) Chancellor, the California Community College (CCC) Board of Governors, the presidents of the independent California colleges and universities as represented by the state association representing the largest number of those members, and, if appropriate, the Bureau. It requires each entity to promptly report a complaint or concern to the postsecondary educational institution, the portal entity, and, where appropriate, the accrediting agency.
- 9) Requires that the MOU executed by the portal entity delegate functions and responsibilities among the parties and provide for reimbursement of expenses. It further prohibits the MOU from weakening existing student privacy and confidentiality protections.
- 10) Requires the CCC Board of Governors to investigate and resolve complaints involving participating community colleges that may arise pursuant to the interstate reciprocity agreement, as specified.
- 11) Requires the Bureau to investigate and resolve complaints that may arise pursuant to the interstate reciprocity agreement involving participating private postsecondary educational institutions that are either approved to operate or exempt from the Act but elect to participate in the interstate reciprocity agreement pursuant to terms and conditions established by the Bureau, as specified.
- 12) Requires the portal entity to ensure that it and participating postsecondary educational institutions have clear and well-documented policies for addressing catastrophic events in a manner that protects students as consumers including the protection of student records. The bill states that the Act and related regulations, constitutes those policies for participating private postsecondary educational institutions approved to operate by the Bureau.

13) Requires the portal entity to work cooperatively with other states in the interstate reciprocity agreement and the commission to enable the success of the interstate reciprocity agreement, as specified.

Changes to the California Private Postsecondary Education Act

- 14) Authorizes the Bureau, after receipt of any of the notifications required of an out-of-state institution registering with the Bureau that enrolls a California student or after determining that such notifications should have been provided, to seek additional information and notify the institution regarding whether it should suspend enrolling new students, and whether other actions are needed to protect California residents while the Bureau continues to investigate.
- 15) Strikes "private" from the type of postsecondary educational institution required to register with the Bureau but specifies that before January 1, 2028, the requirement shall not apply to a higher education institution that grants undergraduate degrees, graduate degrees, or both, and that is either formed as a nonprofit corporation and is accredited by an agency recognized by the USDE, or is a public institution of higher education. Beginning January 1, 2028, specifies that the registration requirement shall not apply to a public or nonprofit higher education institution approved pursuant to an interstate reciprocity agreement to which the state is a party.
- 16) Makes out-of-state public institutions subject to provisions that prohibit an institution from deceptive practices including using California's state seal on a diploma or false advertisement, as specified.

EXISTING LAW:

- Establishes the California Postsecondary Education Commission (CPEC) composed of 17 members representing the higher education segments, the State Board of Education, and nine representatives appointed by the Governor, Senate Rules Committee, and Assembly Speaker to coordinate public, independent, and private postsecondary education in California (Education Code Section 66900, et seq.).
- 2) Establishes California Private Postsecondary Education Act of 2009 (the Act) until January 1, 2027, and requires the Bureau for Private Postsecondary Education (Bureau) to, among other things, review, investigate and approve private postsecondary institutions, programs and courses of instruction pursuant to the Act and authorizes the Bureau to take formal actions against an institution/school to ensure compliance with the Act and even seek closure of an institutions to be accredited by an accrediting agency recognized by the USDE. The Act also provides for specified disclosures and enrollment agreements for students, requirements for cancellations, withdrawals and refunds, and that the Bureau shall administer the Student Tuition Recovery Fund (STRF) to provide refunds to students affected by the possible closure of an institution/school. (Education Code (EDC) Section 94800 et seq.)
- 3) Provides numerous exemptions from the Act and oversight by the Bureau, including, but not limited to schools that are accredited by the Accrediting Commission for Senior Colleges and Universities, Western Association of Schools and Colleges, or the Accrediting Commission for Community and Junior Colleges, and Western Association of Schools and Colleges

(WASC). Requires an independent institution of higher education that is otherwise exempt from the Act to comply with all applicable state and federal laws, including laws relating to fraud, abuse, and false advertising and authorizes these types of institutions to execute a contract with the Bureau for the Bureau to review and, as appropriate, act on complaints concerning the institution, according to specified requirements and subject to a fee of \$1,076. Requires the Bureau to establish a process through which an institution exempt from the Act may request and obtain verification that the institution is exempt. Specifies that the verification is valid for a period of up to two years, as long as the institution maintains full compliance with the requirements of the exemption. (EDC Sections 94874 (i), 94874.9, and 94874.7)

- 4) Defines "out-of-state private postsecondary educational institution" as a private entity without a physical presence in this state that offers distance education to California students for an institutional charge, regardless of whether the institution has affiliated institutions or institutional locations in California. (EDC Section 94850.5)
- 5) Requires an out-of-state private postsecondary educational institution (other than a nonpublic higher education institution that grants undergraduate degrees, graduate degrees, or both, formed as nonprofit corporation and accredited by an agency recognized by the USDE to register with the Bureau, pay a fee and provide evidence of accreditation; evidence that the institution is approved to operate in the state where the institution maintains its main administrative location; and a copy of the institution's catalog and sample enrollment agreement. Requires these institutions to comply with STRF requirements and disclosures. Prohibits an institution from operating in California for failure to comply with the registration requirements. Establishes the validity of a Bureau registration for two years. (EDC Section 94801.5)
- 6) Authorizes the Bureau to establish thresholds of California-based activity that constitute limited physical presence, with those institutions subject to registration requirements defined through regulation, and minimal levels of California-based activity that do not require institutional approval by, nor registration with, the Bureau. Specifies that an institution is considered to have a physical presence in the state if it offers instruction or core academic support services from a physical location owned, operated, or rented by or on behalf of the institution in California. (EDC Section 94801.7)
- 7) Requires the Bureau to adopt regulations establishing minimum operating standards to ensure that the content of each educational program reach its stated objective; maintain specific written standards for student admissions for each educational program; ensure the facilities, instructional equipment and materials are sufficient to meet the educational program's goals; maintain a withdrawal policy and provide refunds; provide qualified personnel; provide upon successful completion of an educational program a degree or diploma; maintain and disburse adequate records and transcripts to students; and follow all other applicable ordinances and laws. (EDC Section 94885 (a)(1-9)).
- 8) Establishes an Office of Student Assistance and Relief (Office or OSAR) for the purpose of advancing and promoting the rights of prospective students, current students, or past students of private postsecondary educational institutions. Tasks the Office with: conducting outreach and providing information and assistance to students who have been affected by the unlawful activities or closure of an institution; serving as a primary point of contact to address the

needs of private postsecondary education students and working in consultation with state and federal agencies, including, but not limited to, California Student Aid Commission, the Office of the Chancellor of the California Community Colleges, the Department of Veterans Affairs, the federal Consumer Financial Protection Bureau, and the USDE. Authorizes the Office to provide outreach to students and prospective students to provide them with, among other information, information on making informed decisions in selecting postsecondary educational institutions, student rights regarding school performance disclosures, enrollment agreements, and cancellation and refund policies, how to contact the office and the Bureau for assistance, student loan rights and assistance, and free nonprofit community based resources. (EDC Sections 94949.7 - 94949.73)

FISCAL EFFECT: According to the Senate Committee on Appropriations:

There is the potential for unknown ongoing significant costs to the agency, department, or office the Governor designates as the portal entity. They note that if the Bureau were to be designated as the portal entity, it would incur significant costs that may exacerbate the bureau's main fund, the Private Postsecondary Education Administration Fund, which faces a substantial structural deficit.

The Senate Committee on Appropriations also notes unknown costs or potential savings for the UC, CSU, and CCC to join and enter into memoranda of understandings (MOUs) with the designated portal entity. Total costs would depend on, among other things, how often the body would meet and the level of support staff or other resources required by the UC, CSU, and CCC to support their participation.

COMMENTS: *Purpose*. According to the author, "enrollment in online higher education courses surged during the pandemic and today remains above pre-2020 levels. Most college students now take some classes online, with one-third enrolling in out-of-state programs."

"Tens of thousands of Californians study online through institutions in other states. However, California is the only state not participating in the State Authorization Reciprocity Agreement, which gives students in member states protection, institutional oversight, and rights even when the educational institution is approved in another state. Instead, out-of-state schools must register with California's Bureau of Private Postsecondary Education, where they are subject to limited regulation. Meanwhile, California institutions face major disadvantages. They must apply and pay fees for every single online program they offer to out-of-state students. At times, it only takes a few out-of-state students enrolling in a CSU or community college class to help meet class minimums, so excluding out-of-state students can mean that courses are not available for California students."

"[SB] 790 requires the Governor to designate a new state entity to oversee postsecondary education policy and authorizes the Governor to join an interstate reciprocity agreement for distance education if the agreement meets specific consumer protection standards. Joining an interstate reciprocity agreement would promote educational access, regulatory efficiency, and economic growth while allowing California to better safeguard its students enrolled online in out-of-state schools."

Background on CPEC. As specified in the "Existing Law" section of this analysis, CPEC was established to coordinate postsecondary education in California and to provide independent

policy analyses and recommendations to the Legislature and the Governor on postsecondary education issues. However, CPEC's budget and responsibilities were reduced over time, casting doubt on its effectiveness and triggering calls for its restructuring. In the 2011-12 Budget Act, Governor Brown vetoed funding for CPEC citing the agency's ineffectiveness in higher education oversight. In his veto message, the Governor acknowledged the well-established need for coordinating and guiding state higher education policy and requested that stakeholders explore alternative ways these functions could be fulfilled.

CPEC shut down in the fall of 2011, transferring its federal Teacher Quality Improvement grant program to the California Department of Education (CDE) and extensive data resources to the CCC Chancellor's Office. Currently no coordinating entity for higher education in California exists.

This bill proposes to delete CPEC from the Education Code and states legislative intent that the portal entity designated by the Governor adopt as many of its duties and responsibilities as possible and be the principal state operating and coordinating entity for postsecondary education.

Staff notes that several legislative proposals introduced in 2025 attempt to establish educational coordinating entities including, AB 95 (Fong, 2025) and SB 638 (Padilla, 2025). Additionally, the topic was included in the Governor's January 2025 budget proposal, and budget discussions remain ongoing following the May budget revision. Unlike the related legislation, this measure stops short of identifying or forming a coordinating body, rather it calls on the Governor to assign coordinating responsibilities to any entity of the Governor's choosing.

State Authorization Reciprocity Agreement (SARA). In response to concerns over the complexity and cost of navigating differing requirements for state authorization in multiple states, a group of institutions, states, and policy organizations came together in 2013 to develop the SARA. SARA provides that accredited, degree-granting private and public institutions approved by an oversight body in one participating state will be deemed automatically to have met approval requirements in other participating states.

General concerns remain about online programs that are offered by some institutions perceived as providing fraud and debt rather than knowledge and skills. In some states, institutions offering distance education programs to California students have entered into settlements with those states after being accused of undertaking misleading online recruiting practices, including deceiving prospective students by leading them to believe that online education degrees would allow them to become licensed professionals. A number of institutions that have been the focus of complaints by state and federal agencies continue to have robust distance education programs and are actively enrolling students.

Institutions that participate in SARA are approved for participation by their home state, and states that join SARA must accept that approval – regardless of the effectiveness of the home state's oversight. Once a state enters SARA, it does not retain authority to enforce its applicable laws. Concerns about the practical impacts of ceding authority to a third-party have been at the root of failed efforts in the past to require California to join SARA, particularly the fact that the state would no longer be able to impose some of the important student protections contained in the Act. SARA would still allow the AG to take action based on general laws (fraud, deception, etc.), but provisions in the Act would not be applicable. Once a state is approved to join SARA,

institutions that are operating under the compact are able to enroll students in their distance education programs.

This bill authorizes California's participation in a reciprocity agreement like SARA only if certain conditions are met, including if it is confirmed that joining will not interfere with California's ability to enforce consumer protection laws or stop any entity involved from operating in this state.

Background on the Bureau of Private Postsecondary Education. The Bureau regulates private postsecondary educational institutions operating in California. The Bureau's roles and responsibilities are outlined in the Act established by AB 48 (Portantino), Chapter 310, Statutes of 2009. Its role is to protect consumers and students from fraud, misrepresentation, or other business practices at private postsecondary institutions that may lead to the loss of students' tuition and related educational funds. It also sets and enforces minimum standards for ethical business practices and the health, safety, and fiscal integrity of postsecondary education institutions. Finally, it establishes and enforces minimum standards for instructional quality and institutional stability for all students in any private postsecondary educational and vocational institutions.

The Bureau has traditionally regulated only those institutions with a "physical presence" in California. As a growing number of public and private institutions organized or incorporated outside California serve California students through online and hybrid instruction, the need for Bureau oversight increased. The Legislature expanded some areas of oversight, providing a registration process for out-of-state private institutions, requiring their participation in STRF, and compliance with other requirements.

Out-of-state accredited private nonprofit institutions without a physical presence in California, however, remain outside of the Bureau's purview, and increasingly, private nonprofit and public institutions are adopting methods of program delivery modeled after for-profit institutions. Under this bill, out-of-state for-profit institutions would continue to register with the Bureau, while out-of-state nonprofit and public institutions could be authorized through the reciprocity agreement. It further specifies that California would retain its ability to require an out-of-state institution to register directly with the Bureau with the appropriate notice.

Arguments in support. The UC wrote in support, noting that "In 2013, [SARA] was established to streamline regulations around distance education programs. Institutions in states that have legislated SARA membership may participate and thereby receive reciprocity rights to provide online courses and programs to students located in other SARA-member states. California remains the only state in the country that is not a part of SARA. Instead, in order to enroll students from other states into UC's online education courses or programs, campuses must undertake state-by-state compliance with these regulations. Compliance with multiple and varied state authorization requirements and fee schedules is time-intensive and costly. In addition to online education, state authorization regulations apply to out-of-state clinical placements for students in health sciences programs. These pose significant hurdles to making out-of-state clinical placements at the seven UC campuses that offer health sciences instruction."

UC continues that, "out-of-state clinical placements and externships are a routine and essential part of clinical education. For medical students, participating in clinical rotations outside of California is essential to placement for their residency training, and expands their understanding

of medical treatment and disease management since some institutions are experts in specific fields. The benefits of out-of-state clinical placements apply to other professional health fields as well, including nursing, physical therapy, and public health. Clinical placements and externships are essential to students gaining more knowledge and experience and are routinely undertaken in other states so that the student can gain exposure to different conditions, populations, and issues. Since all states except California have joined SARA, UC and other California colleges and universities are at an extreme disadvantage in offering online courses, degrees, and clinical placements to residents of other states. States that had previously exempted online educational offerings from California have established more stringent requirements for institutions in states that are not part of SARA. UC has already had to withdraw from clinical placements in some states because California is not a SARA member."

The California State University Chancellor's Office wrote that "there are a number of benefits for why California should join SARA, including the streamlined authorization process. At present, CSU universities must enter into separate authorization agreements with each state, making it burdensome and costly, while limiting student access. Should California join SARA, the CSU would be well positioned to expand educational opportunities for students, allowing them to enroll in online programs with greater ease...participation in SARA helps institutions avoid the financial and administrative burdens associated with obtaining multiple state authorizations. CSU universities spend approximately \$350,000 per year to maintain state authorization with various states. With the CSU currently facing fiscal challenges at the state and federal level, SB 790 would provide some relief to our universities and expand education opportunities for our students."

The Association of Independent California Colleges and Universities (AICCU) also wrote in support, stating that "the implementation of SB 790 will facilitate a more streamlined process for our institutions to offer distance education programs to out-of-state students by participating in interstate reciprocity agreements. This will reduce redundant regulatory burdens, allowing our member institutions to allocate resources more effectively toward enhancing educational quality and student support services. Moreover, it will simplify the ability of institutions to continue serving students who move outside the state and will broaden educational access to students seeking high-quality programs across the country. By creating a pathway for California to streamline this process, the state can expand the opportunities for California's colleges and universities, public and private nonprofit alike, to compete in the national marketplace and offer their programs to more students. This provides an opportunity to help supplement and increase enrollment at California's institutions of higher education, which will help fuel program and faculty growth."

AICCU continues that "importantly, SB 790 maintains California's strong commitment to consumer protections in higher education. The bill ensures that participating institutions adhere to stringent standards that safeguard student interests, uphold academic integrity, and provide mechanisms for addressing student complaints. Recent amendments also provide legislative policy committees an opportunity to review the agreement and for the public to provide testimony. By balancing the facilitation of interstate educational opportunities with robust consumer protections, this legislation exemplifies a thoughtful approach to modernizing higher education policy."

Arguments in opposition. The University of Phoenix wrote in opposition, noting that "SB 790 would prevent out-of-state private for-profit institutions from participating in any reciprocity

agreement that California joins absent any stated justification and with no consideration of the actual qualifications of these schools. Moreover, these qualified schools have been participating in SARA without incident for over a decade offering distance education in full compliance in all other 49 states and territories. In addition, many of these same qualified institutions, like University of Phoenix, have already been providing distance education to California students for years through the Out-of-State Institution Registration process with the [Bureau] without incident. As such, there is no legitimate basis to out-of-hand prevent qualified private for- profit schools from being members of a reciprocity agreement that California joins."

The University of Phoenix continues, writing that, "any interstate reciprocity agreement that California either joins or creates must not discriminate against out-of-state schools if it expects its California schools to be treated fairly and without discriminatory restrictions as an out-of-state school offering distance education to residents of other member states. As noted by the author in the Senate Business and Professions Committee, if California decides not to join SARA in its current form California would have to develop a reciprocity agreement from scratch and try and convince any of the 49 SARA member states to jettison SARA and join California. The premise of creating a separate reciprocity agreement that is based on a discriminatory structure AND the removal of uniform requirements for entry and regulation amongst the member states is likely to fail as interstate reciprocity inherently requires equal and uniform entry and operation standards that all states will agree to so states are assured that all participating institutions are meeting all the standards. A reciprocity agreement cannot work otherwise, and states would be left to individually regulate every school offering distance education to their residents - something that is prohibitively expensive and unworkable and was the reason that a different approach for the regulation of distance education was created over a decade ago."

The Institute for College Access and Success (TICAS), the California Federation of Teachers (CFT), and the Consumer Federation of California also wrote expressing concerns. They note that "from 2021-2023, twenty-two state Attorneys General have sounded the alarm about SARA's limitations, especially regarding states' abilities to enforce their own higher educationspecific consumer protection laws. Furthermore, the State of Washington is actively exploring alternatives to SARA that provide stronger safeguards for students via House Bill 1279-clearly signaling that California should not consider SARA a turnkey solution without first ensuring it retains the power to enforce critical protections...currently, California sets the gold standard in the economic relief it provides students and factors for eligibility to STRF when compared to the more than 20 states that have a STRF-like fund. Under current law, out-of-state for-profit and certain nonprofit schools without a physical presence in California must register with the Bureau and contribute to STRF. This requirement ensures that if a school shuts down, California students can receive compensation. This bill would take away that assurance by eliminating the requirement for these online institutions and their students to participate in STRF—leaving only California-based schools and students to pay in. If an out-of-state school approved under a reciprocity agreement were to suddenly close, affected California students would have to rely on the school's home state for relief, which often means no relief at all. We recommend an amendment to require any out-of-state online institution operating in California to contribute to and provide STRF as a student recourse, or at minimum a STRF-equivalent coverage for California students."

Committee comments. The Committee recommends, and the author has accepted, amendments that remove all language in Section one and Section two of SB 790 pertaining to the designation of a coordinating body and the removal of CPEC from existing law. Amendments would also

remove references to a coordinating body in Section three, and instead requires the Governor to "designate a state agency, department, or office for the implementation of an interstate reciprocity agreement for distance education, to serve as the portal entity if the Governor enters into an interstate reciprocity agreement."

This would effectively remove references to existing law regarding CPEC, and the designation of principal state operating and coordinating entity.

Prior legislation. SB 634 (Block, 2015) would have authorized the Department of Consumer Affairs to enter into a regional state authorization reciprocity agreement with other states through a compact on behalf of this state. SB 634 was pulled from a hearing in the Senate Committee on Education at the request of the author.

REGISTERED SUPPORT / OPPOSITION:

Support

Association of Independent California Colleges & Universities (AICCU) **Biola University** California Baptist University California College of the Arts California State University, Office of the Chancellor Concordia University Irvine Dominican University of California Golden Gate University Loma Linda University Adventist Health Sciences Center and its Affiliated Entities Loma Linda University Health Los Angeles Pacific University Point Loma Nazarene University Santa Clara University Saybrook University Stanford University **UMass** Global University of California University of La Verne University of Redlands University of San Diego University of San Francisco University of Southern California (USC) University of the Pacific Vanguard University of Southern California Westmont College

Opposition

University of Phoenix, INC.

Analysis Prepared by: Kevin J. Powers / HIGHER ED. / (916) 319-3960