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8 **BEFORE THE**
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **FOR THE BUREAU FOR PRIVATE POSTSECONDARY EDUCATION**
11 **STATE OF CALIFORNIA**

11 In the Matter of the Statement of Issues
12 Against:

Case No. 1001710

13 **TRAINING INSTITUTE FOR**
14 **ADDICTION COUNSELORS**

STATEMENT OF ISSUES

15 **Renewal of Approval to Operate and Offer**
16 **Educational Program for Non-Accredited**
17 **Institutions Applicant**

18 **Institution Code: 1919431**

19 Respondent.

20 Complainant alleges:

21 **PARTIES**

22 1. Dr. Michael Marion, Jr. ("Complainant") brings this Statement of Issues solely in his
23 official capacity as the Chief of the Bureau for Private Postsecondary Education, Department of
24 Consumer Affairs.

25 2. On or about February 18, 2014, the Bureau for Private Postsecondary Education
26 received an Application for Renewal of Approval to Operate and Offer Educational Programs for
27 Non-Accredited Institutions ("application") from Training Institute for Addiction Counselors
28 ("Respondent"). On or about February 13, 2014, Terri Melvin, Respondent's Chief Executive

1 Officer, certified under penalty of perjury to the truthfulness of all statements, answers, and
2 representations in the application. The Bureau denied the application on or about March 2, 2016.

3 **JURISDICTION**

4 3. This Statement of Issues is brought before the Director of the Department of
5 Consumer Affairs (“Director”) for the Bureau for Private Postsecondary Education (“Bureau”),
6 under the authority of the following laws. All section references are to the California Education
7 Code unless otherwise indicated.

8 **STATUTES**

9 4. Code section 94891 states:¹

10 (a) The bureau shall adopt by regulation the process and procedures whereby
11 an institution may obtain a renewal of an approval to operate.

12 (b) To be granted a renewal of an approval to operate, the institution shall
13 demonstrate its continued capacity to meet the minimum operating standards.

14 (c) (1) An institution that is denied renewal of an approval to operate may file
15 an appeal in accordance with the procedures established by the bureau pursuant to
16 Section 94888.

17 (2) An institution that has filed an appeal of a denial of a renewal application
18 may continue to operate during the appeal process, but must disclose in a written
19 statement, approved by the bureau, to all current and prospective students, that the
20 institution’s application for renewal of approval to operate was denied by the bureau
21 because the bureau determined the application did not satisfy the requirements to
22 operate in California, that the institution is appealing the bureau’s decision, and that
23 the loss of the appeal may result in the institution’s closure.

24 (3) If the bureau determines that the continued operation of the institution
25 during the appeal process poses a significant risk of harm to students, the bureau shall
26 make an emergency decision pursuant to its authority provided in Section 94938.

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¹ The California Private Postsecondary Education Act of 2009 (“Act”) was amended by
2014 California Senate Bill 1247. The bill took effect on January 1, 2015 and extended the
operation of the Act by two years. It also made certain substantive and technical changes. The Act
was amended again by 2016 California Senate Bill 1192. The bill took effect on January 1, 2017.
It extended the Act by four years and made certain substantive and technical changes. After
Respondent first submitted its application, Code section 94891 was amended in 2014 to include
subdivision (d).

1 5. Code section 94910 states:

2 Except as provided in subdivision (d) of Section 94909 and Section 94910.5,
3 prior to enrollment, an institution shall provide a prospective student with a School
4 Performance Fact Sheet containing, at a minimum, the following information, as it
5 relates to the educational program:

6 (a) Completion rates, as calculated pursuant to Article 16 (commencing with
7 Section 94928).

8 (b) Placement rates for each educational program, as calculated pursuant to
9 Article 16 (commencing with Section 94928), if the educational program is designed
10 to lead to, or the institution makes any express or implied claim related to preparing
11 students for, a recognized career, occupation, vocation, job, or job title.

12 (c) License examination passage rates for programs leading to employment for
13 which passage of a state licensing examination is required, as calculated pursuant to
14 Article 16 (commencing with Section 94928).

15 (d) Salary or wage information, as calculated pursuant to Article 16
16 (commencing with Section 94928).

17 (e) If a program is too new to provide data for any of the categories listed in
18 this subdivision, the institution shall state on its fact sheet: "This program is new.
19 Therefore, the number of students who graduate, the number of students who are
20 placed, or the starting salary you can earn after finishing the educational program are
21 unknown at this time. Information regarding general salary and placement statistics
22 may be available from government sources or from the institution, but is not
23 equivalent to actual performance data."

24 (f) All of the following:

25 (1) A description of the manner in which the figures described in subdivisions
26 (a) to (d), inclusive, are calculated or a statement informing the reader of where he or
27 she may obtain a description of the manner in which the figures described in
28 subdivisions (a) to (d), inclusive, are calculated.

 (2) A statement informing the reader of where he or she may obtain from the
institution a list of the employment positions determined to be within the field for
which a student received education and training for the calculation of job placement
rates as required by subdivision (b).

 (3) A statement informing the reader of where he or she may obtain from the
institution a list of the objective sources of information used to substantiate the salary
disclosure as required by subdivision (d).

 (g) The following statements:

 (1) "This fact sheet is filed with the Bureau for Private Postsecondary
Education. Regardless of any information you may have relating to completion rates,
placement rates, starting salaries, or license exam passage rates, this fact sheet
contains the information as calculated pursuant to state law."

 (2) "Any questions a student may have regarding this fact sheet that have not
been satisfactorily answered by the institution may be directed to the Bureau for

1 Private Postsecondary Education at (address), Sacramento, CA (ZIP Code), (Internet
Web site address), (telephone and fax numbers).”

2 (h) If the institution participates in federal financial aid programs, the most
3 recent three-year cohort default rate reported by the United States Department of
4 Education for the institution and the percentage of enrolled students receiving federal
student loans.

5 (i) Data and information disclosed pursuant to subdivisions (a) to (d), inclusive,
6 is not required to include students who satisfy the qualifications specified in
7 subdivision (d) of Section 94909, but an institution shall disclose whether the data,
8 information, or both provided in its fact sheet excludes students pursuant to this
subdivision. An institution shall not actively use data specific to the fact sheet in its
recruitment materials or other recruitment efforts of students who are not California
residents and do not reside in California at the time of their enrollment.

9 6. Code section 94913 states:

10 (a) An institution that maintains an Internet Web site shall provide on that
11 Internet Web site all of the following:

12 (1) The school catalog.

13 (2) A School Performance Fact Sheet for each educational program offered by
14 the institution.

15 (3) Student brochures offered by the institution.

16 (4) A link to the bureau's Internet Web site.

17 (5) The institution's most recent annual report submitted to the bureau.

18 (b) An institution shall include information concerning where students may
19 access the bureau's Internet Web site anywhere the institution identifies itself as
20 being approved by the bureau.

21 7. Code section 94929.5 states:

22 (a) An institution shall annually report to the bureau, as part of the annual
23 report, and shall publish in its School Performance Fact Sheet, all of the following:

24 (1) The job placement rate, calculated by dividing the number of graduates
employed in the field by the number of graduates available for employment for each
25 program that is either (1) designed, or advertised, to lead to a particular career, or (2)
advertised or promoted with any claim regarding job placement.

26 (2) The license examination passage rates for the immediately preceding two
27 years for programs leading to employment for which passage of a state licensing
28 examination is required, calculated by dividing the number of graduates who pass the
examination by the number of graduates who take the licensing examination the first
time that the examination is available after completion of the educational program.

1 The institution shall use state agency licensing data to calculate license examination
2 passage rates. If those data are unavailable, the institution shall calculate the license
3 examination passage rate in a manner consistent with regulations adopted by the
4 bureau.

5 (3) Salary and wage information, consisting of the total number of graduates
6 employed in the field and the annual wages or salaries of those graduates stated in
7 increments of five thousand dollars (\$5,000).

8 (4) If applicable, the most recent official three-year cohort default rate reported
9 by the United States Department of Education for the institution and the percentage
10 of enrolled students receiving federal student loans.

11 (b) Nothing in this section shall limit the bureau's authority to collect
12 information from an institution to comply with this section and ensure, by regulation
13 and other lawful means, that the information required by this section, and the manner
14 in which it is collected and reported, is all of the following:

15 (1) Useful to students.

16 (2) Useful to policymakers.

17 (3) Based upon the most credible and verifiable data available.

18 (4) Does not impose undue compliance burdens on an institution.

19 (c) Data and information disclosed pursuant to paragraphs (1) to (3), inclusive,
20 of subdivision (a) is not required to include students who satisfy the qualifications
21 specified in subdivision (d) of Section 94909, but an institution shall disclose on its
22 fact sheet and to the bureau whether its data, information, or both, excludes any
23 students pursuant to this subdivision.

24 8. Code section 94930.5 states:

25 Subject to Section 94930, an institution shall remit to the bureau for deposit in
26 the Private Postsecondary Education Administration Fund the following fees, in
27 accordance with the following schedule:

28 (a) The following fees shall be remitted by an institution submitting an
application for an approval to operate, if applicable:

(1) Application fee for an approval to operate: five thousand dollars (\$5,000).

(2) Application fee for the approval to operate a new branch of the institution:
three thousand dollars (\$3,000).

(3) Application fee for an approval to operate by means of accreditation: seven
hundred fifty dollars (\$750).

(b) The following fees shall be remitted by an institution seeking a renewal of
its approval to operate, if applicable:

(1) Renewal fee for the main campus of the institution: three thousand five
hundred dollars (\$3,500).

1 (2) Renewal fee for a branch of the institution: three thousand dollars (\$3,000).

2 (3) Renewal fee for an institution that is approved to operate by means of
3 accreditation: five hundred dollars (\$500).

4 (c) The following fees shall apply to an institution seeking authorization of a
5 substantive change to its approval to operate, if applicable:

6 (1) Processing fee for authorization of a substantive change to an approval to
7 operate: five hundred dollars (\$500).

8 (2) Processing fee in connection with a substantive change to an approval to
9 operate by means of accreditation: two hundred fifty dollars (\$250).

10 (d) (1) In addition to any fees paid to the bureau pursuant to subdivisions (a) to
11 (c), inclusive, each institution that is approved to operate pursuant to this chapter shall
12 remit both of the following:

13 (A) An annual fee for each campus designated by the institution as a main
14 campus location in California, in an amount equal to 0.45 percent of the campus'
15 total gross revenue derived from students in California, but not to be less than two
16 thousand five hundred dollars (\$2,500) and not to exceed sixty thousand dollars
17 (\$60,000).

18 (B) An annual campus fee for each branch of the institution in an amount equal
19 to 0.45 percent of the branch's total gross revenue derived from students in
20 California, but not to be less than two thousand five hundred dollars (\$2,500) and not
21 to exceed sixty thousand dollars (\$60,000).

22 (2) The amount of the annual fees pursuant to paragraph (1) shall be
23 proportional to the bureau's cost of regulating institutions under this chapter, but shall
24 not exceed seven hundred fifty thousand dollars (\$750,000) for any institution.

25 (e) The bureau may assess both of the following fees, if applicable:

26 (1) An out-of-state institution registration fee in an amount of one thousand
27 five hundred dollars (\$1,500).

28 (2) A request for inactive status fee in an amount of five hundred dollars (\$500).

(f) It is the intent of the Legislature that the fees established pursuant to this
section be evaluated during the 2017-18 state budget process and, if necessary,
adjusted by subsequent legislation based upon information provided to the
Legislature by the department and the bureau.

(g) Notwithstanding subdivision (d), effective July 1, 2018, the annual fee for
each campus described in subparagraphs (A) and (B) of paragraph (1) of subdivision
(d) shall be in an amount equal to 0.55 percent of that campus' total gross revenue
derived from students in California, but not to be less than two thousand five hundred
dollars (\$2,500) and not to exceed sixty thousand dollars (\$60,000) for each campus.

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REGULATIONS

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2 9. California Code of Regulations, title 5, section 71475 states, in pertinent part:

3 (e) The institution shall submit at the time it applies for renewal current
4 financial statements that meet the requirements of section 74115 as follows: (1) for
5 an institution with annual gross revenues of \$500,000 and over, statements shall be
6 audited; (2) for an institution with annual gross revenues less than \$500,000,
7 statements shall be reviewed.

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11 10. California Code of Regulations, title 5, section 71485 states:

12 Failure of an institution to have made current payments of the assessments to
13 the Student Tuition Recovery Fund as required by chapter 7 of this Division, and
14 annual fees as required by chapter 5 of this Division shall render the institution
15 ineligible for renewal.

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19 11. California Code of Regulations, title 5, section 71745 states:

20 (a) The institution shall document that it has at all times sufficient assets and
21 financial resources to do all of the following:

22 (1) Provide all of the educational programs that the institution represented it
23 would provide.

24 (2) Ensure that all students admitted to its educational programs have a
25 reasonable opportunity to complete the programs and obtain their degrees or
26 diplomas.

27 (3) Maintain the minimum standards required by the Act and this chapter.

28 (4) Pay timely refunds as required by Article 13 of the Act.

(5) Pay all operating expenses due within 30 days.

(6) Maintain a ratio of current assets to current liabilities of 1.25 to 1.00 or
greater at the end of the most recent fiscal year when using generally accepted
accounting principles, or for an institution participating in Title IV of the federal
Higher Education Act of 1965, meet the composite score requirements of the U.S.
Department of Education. For the purposes of this section, current assets does not
include: intangible assets, including goodwill, going concern value, organization
expense, startup costs, long-term prepayment of deferred charges, and non-returnable
deposits, or state or federal grant or loan funds that are not the property of the
institution but are held for future disbursement for the benefit of students. Unearned
tuition shall be accounted for in accordance with general accepted accounting
principles.

(b) At an institution's request, the Bureau may consider the financial resources

1 of a parent company if the parent company, as defined by section 94853 of the Code,
meets and maintains all of the following provisions:

2 (1) consents in writing to be sued in California;

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4 (2) consents in writing to be subject to the jurisdiction of the Bureau with
respect to the institution's regulation under the Act and this Chapter;

5 (3) designates and maintains an agent for service of process, consistent with
6 section 74190;

7 (4) agrees in writing to pay any refund, claim, penalty, or judgment that the
8 institution is obligated to pay; and

9 (5) files financial reports, maintains financial records, and consents in writing
10 to permit the inspection and copying of financial records to the same extent as is
required of the institution.

11 (c) An institution shall provide to the Bureau its most current financial
12 statements upon request.

13 12. California Code of Regulations, title 5, section 71810 states:

14 (a) Each institution shall provide a catalog pursuant to section 94909 of the
15 Code, which shall be updated annually. Annual updates may be made by the use of
16 supplements or inserts accompanying the catalog. If changes in educational
17 programs, educational services, procedures, or policies required to be included in the
catalog by statute or regulation are implemented before the issuance of the annually
updated catalog, those changes shall be reflected at the time they are made in
supplements or inserts accompanying the catalog.

18 (b) The catalog shall contain the information prescribed by Section 94909 of
19 the Code and all of the following:

20 (1) The specific beginning and ending dates defining the time period covered
21 by the catalog;

22 (2) A statement of the institution's missions and purposes and the objectives
23 underlying each of its educational programs;

24 (3) If the institution admits students from other countries, whether visa services
25 are provided or whether the institution will vouch for student status, and any
associated charges;

26 (4) Language proficiency information, including: (A) the level of English
27 language proficiency required of students and the kind of documentation of
28 proficiency, such as the Test of English as a Foreign Language (TOEFL), that will
be accepted; and (B) whether English language services, including instruction such
as ESL, are provided and, if so, the nature of the service and its cost;

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(5) Whether any instruction will occur in a language other than English and, if so, the level of proficiency required and the kind of documentation of proficiency, such as the United States Foreign Service Language Rating System, that will be accepted;

(6) The institution's policies and practices regarding any form of financial aid, including all consumer information which the institution is required to disclose to the student under any state or federal financial aid program;

(7) The institution's policies and procedures for the award of credit for prior experiential learning, including assessment policies and procedures, provisions for appeal, and all charges that a student may be required to pay;

(8) The institution's standards for student achievement;

(9) A description of the facilities and of the types of equipment and materials that will be used for instruction;

(10) A description of library and other learning resources and the procedures for student access to those resources;

(11) If the institution offers distance education, the approximate number of days that will elapse between the institution's receipt of student lessons, projects, or dissertations and the institution's mailing of its response or evaluation.

(12) A description of all student services;

(13) Housing information including all of the following:

(A) Whether the institution has dormitory facilities under its control;

(B) The availability of housing located reasonably near the institution's facilities and an estimation of the approximate cost or range of cost of the housing; and

(C) If the institution has no responsibility to find or assist a student in finding housing, a clear and conspicuous statement so indicating. A statement that the program is "non-residential" does not satisfy this subparagraph.

(14) Policies on student rights, including the procedure for addressing student grievances; and

(15) Policies on the retention of student records.

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1 13. California Code of Regulations, title 5, section 74000 states:

2 (a) An institution shall pay the fees established by Article 17 of the Act. A
3 failure to include a fee with an application or other request renders the application or
4 request incomplete.

4 (b) All fees lawfully collected are non-refundable.

5 (c) A fee that is not paid timely is subject to penalty as set forth in section 94931
6 of the Code.

7 (d) The Bureau shall deny a renewal of an approval to operate if the institution
8 fails to submit at the time it files its application for renewal of an approval to operate:
9 all unpaid fees; penalty fees; penalties; orders for reimbursement of costs and
10 expenses; and assessments for, and reimbursement of all payments made to students
11 from, the Student Tuition Recovery Fund.

10 (e)(1) If an institution fails to pay any fee and any penalty fees timely, the
11 Bureau may initiate proceedings to revoke the institution's approval to operate for
12 failure to pay fees.

12 (2) Any proceeding to revoke an institution's approval to operate is subject to
13 the provisions of Chapter 5 of the Administrative Procedures Act. If a hearing is
14 requested, it shall be limited to the issues of whether any fee or penalty was owed
15 and, if so, whether the fee or penalty were paid when originally due.

14 (3) The procedure specified in this subdivision is cumulative to any other right
15 or remedy the Bureau may invoke against an institution which fails to pay its annual
16 fee or a penalty fee when originally due. Nothing in this subdivision restricts the
17 Bureau's authority to bring other administrative or judicial action against an
18 institution that fails to pay its fees when due.

17 (4) An institution whose approval to operate was revoked because of
18 nonpayment of an annual fee or penalty fee may seek to obtain approval to operate
19 only by filing an application for a new approval to operate.

19 14. California Code of Regulations, title 5, section 74006 states:

20 (a) An institution's annual fee is due within 30 days of the date on which the
21 institution originally receives its approval to operate and each year thereafter on the
22 anniversary of the date of the original approval.

22 (b) An institution shall pay its annual fee in addition to any other applicable
23 fees.

24 (c) The annual institutional fee is based on the institution's annual revenue. For
25 purposes of this article, annual revenue is annual gross revenue.

26 15. California Code of Regulations, title 5, section 74112 states:

27 (a) Format. The format for the Performance Fact Sheet shall be in at least 12
28 pt. type, in an easily readable font, with 1.15 line spacing and all titles and column
headings shall be in bold 14 pt. type, which shall also identify the program for which

1 the Performance Fact Sheet pertains. The Performance Fact Sheet shall contain all
2 and only the information required or specifically permitted by sections 94910 and
3 94929.5 of the Code or this chapter. A separate Performance Fact Sheet shall be
4 prepared for each program.

5 (b) An institution offering educational programs that are too new to provide the
6 required two years of data shall include the date the program began as well as the
7 statement required by section 94910(e) of the Code. The Performance Fact Sheet
8 shall also disclose the estimated date of availability for two full years of data for those
9 programs.

10 (c) Institutions approved under section 94874.8 of the Code, which do not
11 include all required information per section 94874.8(a)(4), shall include on the
12 Performance Fact Sheet the date of approval to operate and when the required data
13 will be available.

14 (d) In addition to the definitions contained in section 94928 of the Code:

15 (1) "Number of Students Who Began the Program" means the number of
16 students who began a program who were scheduled to complete the program within
17 100% of the published program length within the reporting calendar year, and
18 excludes all students who cancelled during the cancellation period.

19 (2) "Number of On-time Graduates" means the number of students who
20 completed the program within 100% of the published program length within the
21 reporting calendar year.

22 (3) "Gainfully Employed" means:

23 (A)(i) The graduate is employed in a job classification under the United States
24 Department of Labor's Standard Occupational Classification codes, using the
25 Detailed Occupation (six-digit) level, for which the institution has identified in its
26 catalog and in its employment positions list required by section 94910(f)(2) of the
27 Code that the program prepares its graduates; and

28 (ii) The graduate is employed in a single position or concurrent aggregated
positions totaling at least 30 hours per week for 5 weeks (35 calendar days), or
totaling at least 20 hours per week for 5 weeks (35 calendar days) with a statement
signed by the graduate stating that he or she chose to seek part-time employment
rather than fulltime employment after graduation; or

(B) The graduate is employed by the same employer that employed the
graduate before enrollment, and any of the following conditions are met:

(i) the graduate is employed in an occupation with a different Detailed
Occupation (six-digit) level Standard Occupational Classification code than applies
to the position in which the graduate was employed before enrollment; or

(ii) the employer or the graduate provides a statement to the effect that the
employment after graduation was the result of a promotion with increased pay, due
at least in part to graduation from the program; or

(iii) the employer or the graduate provides a statement to the effect that the
degree or the completed program was required as a condition of continued
employment; or

1 (C) The graduate is self-employed or working freelance as reasonably
2 evidenced by, but not limited to, a business license, fictitious business name
3 statement, advertising (other than business cards), website, or business receipts or
4 other evidence of income from business; or an attestation signed by the graduate of
5 self-employment or freelance work and dated after graduation.

6 (e) Reporting periods:

7 (1) An Annual Report shall include data for all educational programs as defined
8 in section 94837 of the Code for the previous one calendar year.

9 (2) A Performance Fact Sheet shall be current and available not later than
10 December 1st, and shall report data for the previous two calendar years based upon
11 the "number of students who began the program," as defined in subdivision (d)(1) of
12 this section and were scheduled to graduate in the reported year(s).

13 (f) Total Charges. The institution's Annual Report and Performance Fact Sheet
14 shall include the total charges for a student to complete the program within 100% of
15 the program length. The institution must include the disclosure that there may be
16 additional charges if the program is not completed on-time.

17 Total charges shall be disclosed in the Performance Fact Sheet in a format
18 substantially similar to the format listed below (dates and numbers are for example
19 only):

20 **Cost of Educational Program:**

21 Total Charges for the program for students completing on-time in 20XX:
22 \$50,000.

23 Total Charges may be higher for students that do not complete on-time.

24 Student's Initials: _____ Date: _____

25 **Initial only after you have had sufficient time to read and understand the
26 information.**

27 (g) Student Loan/Debt Information.

28 (1) If the institution participates in federal financial aid programs, the
institution shall include loan information in the institution's Annual Report and on
the Performance Fact Sheet. The loan information shall include:

(A) The most recent three year cohort default rate, as reported by the United
States Department of Education;

(B) The percentage of enrolled students receiving federal student loans;

(C) The average amount of federal student loan debt of those graduates who
have federal student loan debt in the reporting year; and

(D) The percentage of graduates with federal student loans, as calculated by
the institution.

1 Loan information shall be included in the Performance Fact Sheet in a format
2 substantially similar to the format listed below (dates and numbers are for example
3 only):

4 **Federal Student Loan Debt at (Name of Institution)**

5 Percentage of students who defaulted on their federal student loans at this school:	28% ¹
6 Percentage of students enrolled in 20XX who took out federal student loans to pay for 7 this program:	43%
8 Percentage of graduates in 20XX who took out federal student loans to pay for this 9 program:	65%
10 Average federal student loan debt of 20XX graduates who took out federal student 11 loans at this institution:	\$26,000

12 ¹ The percentage of students who defaulted on their federal student loans is
13 called the Cohort Default Rate (CDR). It shows the percentage of this school's
14 students who were more than 270 days (about 9 months) behind on their federal
15 student loans within three years of when the first payment was due. This is the most
16 recent CDR reported by the U.S. Department of Education.

17 Student's Initials: _____ Date: _____

18 **Initial only after you have had sufficient time to read and understand the
19 information.**

20 (2) Institutions that do not participate in federal financial aid programs shall
21 include one of two statements in the Performance Fact Sheet in a format substantially
22 similar to the following:

23 Students at (name of institution) are not eligible for federal student loans. The
24 U.S. Department of Education has determined that this institution does not meet the
25 criteria that would allow its students to participate in federal student aid programs.

26 or

27 (Name of Institution) is eligible, but chooses not to participate in federal
28 student aid programs. So students here do not have federal student loans.

Student's Initials: _____ Date: _____

**Initial only after you have had sufficient time to read and understand the
information.**

(h) Completion Rates. Reporting of completion rates for an institution's Annual
Report and Performance Fact Sheet shall include, for each educational program, the
number of students who began the program as defined in subdivision (d)(1) of this
section, the number of students available for graduation, number of on-time
graduates, and completion rate(s). An optional table may be added to include
completion rate data for students completing within 150% of the published program
length. For an institution reporting completion data pursuant to section 94929(b) of
the Code, completion data shall be separately reported for each program and the
Performance Fact Sheet shall disclose, if true, that the completion data is being
reported for students completing within 150% of the published program length, and
that data is not being separately reported for students completing the program within

100% of the published program length. Programs that are more than one year in length which are reporting 150% Completion Rate will provide four calendar years of data.

Completion rates shall be included in the Performance Fact Sheet in a format substantially similar to the chart below (dates, numbers, and other data shown are for example only):

On-time Completion Rates (Graduation Rates) (includes data for the two calendar years prior to reporting)

Name of Educational Program (Program Length)

<i>Calendar Year</i>	<i>Number of Students Who Began the Program</i>	<i>Students Available for Graduation</i>	<i>Number of On-time Graduates</i>	<i>On-time Completion Rate</i>
20XX	100	98	70	71%
20XY	80	80	55	69%

Students Completing Within 150% of the Published Program Length

Name of Educational Program (Program Length)

<i>Calendar Year</i>	<i>Number of Students Who Began the Program</i>	<i>Students Available for Graduation</i>	<i>150% Graduates</i>	<i>150% Completion Rate</i>
20XX	100	98	95	97%
20XY	80	80	78	98%
*20XZ	90	90	87	97%
*20YA	87	85	74	87%

*Included only if program is more than one year in length

Student's Initials: _____ Date: _____

Initial only after you have had sufficient time to read and understand the information.

(i) Job Placement Rates.

(1) Any placement data required by sections 94910(b) and 94929.5(a) of the Code shall be reported for the number of students who began the program as defined in subdivision (d)(1) of this section for each reported calendar year.

(2) Placement is measured six months from the graduation date of each student. For programs that require passage of a licensing examination, placement shall be measured six months after the announcement of the examination results for the first examination available after a student completes an applicable educational program. Reporting of placement rates shall include for each educational program: the number of students who began the program, the number of graduates as defined in section 94842 of the Code, the graduates available for employment, graduates employed in

the field and job placement rate(s).

(3) If the institution makes any claim related to preparing students for a job or regarding job placement, the list required by section 94910(f)(2) of the Code shall identify the employment positions by using the Detailed Occupation or six-digit level of the Standard Occupational Classification codes.

(4) Placement rate shall be calculated as follows: the number of graduates employed in the field as defined in section 94928(e)(1) of the Code in conjunction with section 74112(d)(3) divided by the number of graduates available for employment as defined in section 94928(d) of the Code.

Job Placement rates and related disclosures shall be included in the Performance Fact Sheet in a format substantially similar to the charts below, (dates, numbers, and other data shown are for example only):

Job Placement Rates (includes data for the two calendar years prior to reporting)

Name of Educational Program (Program Length)

<i>Calendar Year</i>	<i>Number of Students Who Began the Program</i>	<i>Number of Graduates</i>	<i>Graduates Available for Employment</i>	<i>Graduates Employed in the Field</i>	<i>Placement Rate % Employed in the Field</i>
20XX	100	70	70	55	79%
20XY	80	55	55	20	36%

Gainful Employment Categories (includes data for the two calendar years prior to reporting)

Name of Educational Program (Program Length)

Part Time vs. Full Time Employment

	Graduates Employed in the field 20 to 29 hours per week	Graduates Employed in the field at least 30 hours per week	Total Graduates Employed in the Field
20XX	15	40	55
20XY	5	15	20

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Single Position vs. Concurrent Aggregated Positions

	Graduates Employed in the field in a single position	Graduates Employed in the field in concurrent aggregated positions	Total Graduates Employed in the Field
20XX	52	3	55
20XY	19	1	20

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Self-Employed/Freelance Positions

	Graduates Employed who are self-employed or working freelance	Total Graduates Employed in the Field
20XX	3	55
20XY	5	20

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Institutional Employment

	Graduates Employed in the field who are employed by the institution, an employer owned by the institution, or an employer who shares ownership with the institution	Total Graduates Employed in the Field
20XX	15	55
20XY	5	20

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Student's Initials: _____ Date: _____

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Initial only after you have had sufficient time to read and understand the information.

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(5) The following self-employment/freelance worker disclosure shall be initiated by students entering any programs in which the majority of graduates who obtain jobs obtain in this type of work:

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This program may result in freelance or self-employment.

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- The work available to graduates of this program is usually for freelance or self-employment.

- 1 • This type of work may not be consistent.
- 2 • The period of employment can range from one day to weeks to several
- 3 months.
- 4 • Hours worked in a day or week may be more or less than the traditional 8
- 5 hour work day or 40 hour work week.
- 6 • You can expect to spend unpaid time expanding your networks, advertising,
- 7 promoting your services, or honing your skills.
- 8 • Once graduates begin to work freelance or are self-employed, they will be
- 9 asked to provide documentation that they are employed as such so that they may be
- 10 counted as placed for our job placement records.
- 11 • Students initialing this disclosure understand that either a majority or all of
- 12 this school's graduates are employed in this manner and understand what comprises
- 13 that work style.

14 Student's Initials: _____ Date: _____

15 **Only initial after you have had sufficient time to read and understand the**

16 **information.**

17 (j) License Examination Passage Rates. If license examination passage rates

18 are not available from the appropriate state agency, an institution shall collect the

19 information directly from its graduates. If an institution demonstrates that, after

20 reasonable efforts, it is unable to obtain the examination passage information from

21 its graduates, the institution shall report the number of students it could not contact

22 and note in a font the same size as the majority of the data on the Performance Fact

23 Sheet, "License examination passage data is not available from the state agency

24 administering the examination. We were unable to collect data from [enter the

25 number] graduates."

26 Reporting of license examination passage rates for the Annual Report and the

27 Performance Fact Sheet shall include, for each educational program: the number of

28 graduates in the reported year, the number of documented graduates who passed the

first available examination, number of documented graduates who failed the first

available examination, the number of graduates for whom data is not available. An

optional column may be added to separately report licensing examination data for

graduates who take and pass the exam after failing initially. The Annual Report shall

also include a description of the processes for attempting to contact those students.

For licensing examinations that are not continuously administered, license

examination passage rates shall be included in the Performance Fact Sheet in a format

substantially similar to the chart below, (dates, numbers, and other data shown are

for example only):

License Examination Passage Rates (includes data for the two calendar years

prior to reporting)

Name of Educational Program (Program Length)

First Available Exam Date	Date Exam Results Announced	Number of Graduates in Calendar Year	Number of Graduates Taking Exam	Number Who Passed Exam	Number Who Failed Exam	Passage Rate
2/1/20XX	3/15/20XX	277	80	40	40	50%
6/1/20XX	7/15/20XX	277	100	75	25	75%
10/1/20XX	11/15/20XX	277	82	68	14	76%
2/1/20XY	3/20/20XX	304	80	40	40	50%
6/1/20XY	7/19/20XX	304	100	70	30	70%
10/1/20XY	11/19/20XX	304	92	62	30	67%

License examination passage data is not available from the state agency administering the examination. We were unable to collect data from 32 graduates.

Student's Initials: _____ Date: _____

Initial only after you have had sufficient time to read and understand the information.

For licensing examinations that are continuously administered, license examination passage rates shall be included in the Performance Fact Sheet in a format substantially similar to the chart below (dates, numbers, and other data shown are for example only):

License Examination Passage Rates (includes data for the two calendar years prior to reporting)

Name of Educational Program (Program Length)

<i>Calendar Year</i>	<i>Number of Graduates in Calendar Year</i>	<i>Number of Graduates Taking Exam</i>	<i>Number Who Passed First Available Exam</i>	<i>Number Who Failed First Available Exam</i>	<i>Passage Rate</i>
20XX	95	80	40	40	50%
20XY	109	100	75	25	75%

License examination passage data is not available from the state agency administering the examination. We were unable to collect data from 10 graduates.

Student's Initials: _____ Date: _____

1 **Initial only after you have had sufficient time to read and understand the information.**

2 (k) Salary and Wage Information.

3 All Salary and Wage Information shall be reported to the Bureau pursuant to
4 sections 94910(d) and 94929.5(a)(3) of the Code and shall be included in the
5 Performance Fact Sheet, for each educational program, in a format substantially
6 similar to the chart below (dates, numbers, salaries, and other data shown are for
7 example only).

8 **Salary and Wage Information** (includes data for the two calendar years prior
9 to reporting)

10 **Name of Educational Program (Program Length)**

11 *Annual Salary and Wages Reported for Graduates Employed in the Field*

12 <i>Calendar Year</i>	13 <i>Graduates Available for Employment</i>	14 <i>Graduates Employed in the Field</i>	15 <i>\$15,000–\$20,000</i>	16 <i>\$20,001–\$25,000</i>	17 <i>\$25,001–\$30,000</i>	18 <i>\$30,001–\$35,000</i>	19 <i>No Salary Information Reported</i>
20 20XX	21 100	22 70	23 5	24 40	25 6	26 3	27 16
28 20XY	80	55	5	7	3	5	35

A list of sources used to substantiate salary disclosures is available from the school. (Insert how student can obtain this information.)

Student's Initials: _____ Date: _____

18 **Initial only after you have had sufficient time to read and understand the information.**

19 (l) Definitions. Definitions for all terms contained on the Performance Fact
20 Sheet shall be included as part of the Performance Fact Sheet, in the same format as
21 required in subdivision (a).

22 The following are the definitions for the Performance Fact Sheet:

23 “Number of Students Who Began the Program” means the number of students
24 who began a program who were scheduled to complete the program within 100% of
25 the published program length within the reporting calendar year and excludes all
26 students who cancelled during the cancellation period.

27 “Students Available for Graduation” is the number of students who began the
28 program minus the number of students who have died, been incarcerated, or been
called to active military duty.

“Number of On-time Graduates” is the number of students who completed the
program within 100% of the published program length within the reporting calendar
year.

1 "On-time Completion Rate" is the number of on-time graduates divided by the
number of students available for graduation.

2 "150% Graduates" is the number of students who completed the program
3 within 150% of the program length (includes on-time graduates).

4 "150% Completion Rate" is the number of students who completed the
5 program in the reported calendar year within 150% of the published program length,
including on-time graduates, divided by the number of students available for
graduation.

6 "Graduates Available for Employment" means the number of graduates minus
7 the number of graduates unavailable for employment.

8 "Graduates Unavailable for Employment" means the graduates who, after
9 graduation, die, become incarcerated, are called to active military duty, are
international students that leave the United States or do not have a visa allowing
10 employment in the United States, or are continuing their education in an accredited
or bureau-approved postsecondary institution.

11 "Graduates Employed in the Field" means graduates who beginning within six
12 months after a student completes the applicable educational program are gainfully
employed, whose employment has been reported, and for whom the institution has
13 documented verification of employment. For occupations for which the state requires
passing an examination, the six month period begins after the announcement of the
14 examination results for the first examination available after a student completes an
applicable educational program.

15 "Placement Rate Employed in the Field" is calculated by dividing the number
of graduates gainfully employed in the field by the number of graduates available for
16 employment.

17 "Number of Graduates Taking Exam" is the number of graduates who took the
first available exam in the reported calendar year.

18 "First Available Exam Date" is the date for the first available exam after a
19 student completed a program.

20 "Passage Rate" is calculated by dividing the number of graduates who passed
the exam by the number of graduates who took the reported licensing exam.

21 "Number Who Passed First Available Exam" is the number of graduates who
22 took and passed the first available licensing exam after completing the program.

23 "Salary" is as reported by graduate or graduate's employer.

24 "No Salary Information Reported" is the number of graduates for whom, after
making reasonable attempts, the school was not able to obtain salary information.

25 (m) Documentation supporting all data reported shall be maintained
26 electronically by the institution for at least five years from the last time the data was
included in either an Annual Report or a Performance Fact Sheet and shall be
27 provided to the Bureau upon request; the data for each program shall include at a
minimum:

28 (1) the list of job classifications determined to be considered gainful

1 employment for the educational program;

2 (2) student name(s), address, phone number, email address, program
3 completed, program start date, scheduled completion date, and actual completion
4 date;

5 (3) graduate's place of employment and position, date employment began, date
6 employment ended, if applicable, actual salary, hours per week, and the date
7 employment was verified;

8 (4) for each employer from which employment or salary information was
9 obtained, the employer name(s) address and general phone number, the contact
10 person at the employer and the contact's phone number and email address, and all
11 written communication with employer verifying student's employment or salary;

12 (5) for students who become self-employed, all documentation necessary to
13 demonstrate self-employment;

14 (6) a description of all attempts to contact each student or employer;

15 (7) any and all documentation used to provide data regarding license
16 examinations and examination results;

17 (8) for each student determined to be unavailable for graduation or unavailable
18 for employment, the identity of the student, the type of unavailability, the dates of
19 unavailability, and the documentation of the unavailability; and

20 (9) the name, email address, phone number, and position or title of the
21 institution's representative who was primarily responsible for obtaining the students'
22 completion, placement, licensing, and salary and wage data, the date that the
23 information was gathered, and copies of notes, letters or emails through which the
24 information was requested and gathered.

25 (n) The institution shall provide on a separate document along with the
26 Performance Fact Sheet the same cancellation disclosure as that which is required to
27 be included with the enrollment agreement by Section 94911(e)(1) of the Code. The
28 separate document shall be substantially the same size as the Performance Fact Sheet
and shall be captioned "STUDENT'S RIGHT TO CANCEL" using bold 14 pt. type.

16. California Code of Regulations, title 5, section 74115 states:

22 (a) This section applies to every set of financial statements required to be
23 prepared or filed by the Act or by this chapter.

24 (b) A set of financial statements shall contain, at a minimum, a balance sheet,
25 an income statement, and a cash flow statement, and the preparation of financial
26 statements, shall comply with all of the following:

27 (1) Audited and reviewed financial statements shall be conducted and prepared
28 in accordance with the generally accepted accounting principles established by the
American Institute of Certified Public Accountants by an independent certified public
accountant who is not an employee, officer, or corporate director or member of the

governing board of the institution.

(2) Financial statements prepared on an annual basis as required by section 74110(b) shall be prepared in accordance with the generally accepted accounting principles established by the American Institute of Certified Public Accountants. Nonprofit institutions shall provide annual financial statements as required under generally accepted accounting principles for nonprofit organizations.

(3) The financial statements shall establish that the institution meets the requirements for financial resources required by Section 71745.

(4) If an audit performed to determine compliance with any federal or state student financial aid program reveals any failure to comply with the requirements of the program and the noncompliance creates any liability or potential liability for the institution, the financial statements shall reflect the liability or potential liability.

(5) Any audits shall demonstrate that the accountant obtained an understanding of the institution's internal financial control structure, assessed any risks, and has reported any material deficiencies in the internal controls.

(c) Work papers for the financial statements shall be retained for five years from the date of the statements and shall be made available to the Bureau upon request.

(d) "Current" with respect to financial statements means completed no sooner than 120 days prior to the time it is submitted to the Bureau, and covering no less than the most recent complete fiscal year. If more than 8 months will have elapsed between the close of the most recent complete fiscal year and the time it is submitted, the fiscal statements shall also cover no less than five months of that current fiscal year.

STATEMENT OF FACTS

A. In February 2014, the Bureau received a renewal application from Respondent.

17. On or about February 18, 2014, the Bureau received Respondent's application. On or about February 13, 2014, Terri Melvin ("Melvin"), Respondent's Chief Executive Officer, certified under penalty of perjury to the truthfulness of all statements, answers, and representations in the application.

B. The Bureau notified Respondent that the application was incomplete.

18. On or about February 28, 2014, the Bureau sent a letter to Respondent's address of record, informing Respondent that the application was incomplete for three reasons.

1) The financial statements were not audited by a CPA.

19. First, Respondent failed to provide current financial statements that were audited or

1 reviewed by a certified public accountant. Instead, Respondent provided an unaudited cash-basis
2 balance sheet and a profit-and-loss statement covering the period of October 2012 through
3 September 2013.

4 **2) The 2012 annual report was incomplete.**

5 20. Second, Respondent did not submit a complete 2012 annual report. The annual report
6 was missing three items: 1) a 2012 School Performance Fact Sheet ("SPFS") ; 2) a 2012 school
7 catalog; and 3) compiled financial statements.

8 **3) A Student Tuition Recovery Fund Assessment Reporting Form was missing.**

9 21. Third, Respondent did not submit a Student Tuition Recovery Fund Assessment
10 Reporting Form for the second quarter of 2011.

11 **C. In March 2014, Respondent promised to complete the application.**

12 22. On or about March 10, 2014, the Bureau received a letter from Melvin. Melvin stated
13 that he made an appointment with a certified public accountant on April 21, 2014, and that the
14 institution intended to submit audited financial statements.

15 **D. In June 2014, Respondent supplemented the application.**

16 23. On or about June 4, 2014, the Bureau received a letter from Melvin, dated May 28,
17 2014. Included with Melvin's letter were an SPFS for years 2011 and 2012; a 2012 school
18 catalog; and compiled financial statements for the year ended September 30, 2013.

19 24. The financial statements were audited by a certified public accountant, but they were
20 not current.

21 25. To be current, financial statements 1) must be completed 1) no sooner than 120 days
22 before they are submitted to the Bureau; 2) they must cover at least the most recent complete
23 fiscal year; and 3) they must include five months of the current fiscal year if they are submitted
24 more than eight months after the close of the most recent complete fiscal year.

25 26. The financial statements were not current because they were submitted more than
26 eight months after the close of the most recent fiscal year (September 2013), and they did not
27 include five months of the current fiscal year, as was required.

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E. In October 2015, The Bureau notified Respondent that its application was still deficient.

27. On or about October 16, 2014, the Bureau notified Respondent by letter that Respondent's application was still deficient.

F. In December 2015, Respondent supplemented its application.

28. On or about December 21, 2015, the Bureau received a number of additional documents, including, in relevant part, a balance sheet and profit and loss statement for year ended September 30, 2014 and a copy of Respondent's SPFS for school years 2012-2013 and 2013-2014.

G. The Bureau denied the application.

29. On or about March 2, 2016, the Bureau denied Respondent's application.

FIRST CAUSE FOR DENIAL OF APPLICATION
(Failure to Submit Current Financial Statements)

30. Respondent's application is subject to denial under Code section 94891, subdivision (b), in conjunction with California Code of Regulations, title 5, section 74115, subdivision (d), because Respondent submitted financial statements that were not current.

31. On or about June 4, 2014, Respondent submitted financial statements for year ended September 30, 2013. The financial statements were not current because they did not include at least five months of the current fiscal year in which they were submitted, having been submitted more than eight months after the close of the previous fiscal year.

32. On or about December 21, 2015, Respondent submitted internal financial documents for year ended September 30, 2014. These financial statements were not current because they did not contain at least five months of the current fiscal year in which they were submitted, having been submitted more than eight months after the close of the previous fiscal year.

33. Complainant realleges paragraphs 17 through 29.

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1 **SECOND CAUSE FOR DENIAL OF APPLICATION**

2 **(Failure to Submit Reviewed Financial Statements)**

3 34. Respondent’s application is subject to denial under Code section 94891, subdivision
4 (b), in conjunction with California Code of Regulations, title 5, sections 71475, subdivision (e),
5 and 74115, subdivision (b)(1), because Respondent submitted financial statements that were not
6 reviewed by an independent certified public accountant. In particular, Respondent submitted
7 internal financial documents for year ended September 30, 2014. These statements were not
8 reviewed by an independent certified public accountant. Complainant realleges paragraphs 17
9 through 32.

10 **THIRD CAUSE FOR DENIAL OF APPLICATION**

11 **(Failure to Demonstrate Sufficient Assets and Financial Resources)**

12 35. Respondent’s application is subject to denial under California Code of Regulations,
13 title 5, section 71745, subdivision (a)(5), because Respondent was unable to document that at all
14 times it had sufficient assets and financial resources to pay all of its operating expenses due
15 within 30 days. Complainant realleges paragraphs 17 through 34.

16 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

17 **(Failure to Meet Ratio of Assets to Liabilities)**

18 36. Respondent’s application is subject to denial under California Code of Regulations,
19 title 5, section 71745, subdivision (a)(6), because Respondent was unable to document that at all
20 times it had sufficient assets and financial resources to maintain a ratio of current assets to current
21 liabilities of 1.25 to 1.00 or greater at the end of the most recent fiscal year. In particular,
22 Respondent’s ratio was 0.09 based on the audited financial statements submitted with
23 Respondent’s application. Complainant realleges paragraphs 17 through 35.

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1 **FIFTH CAUSE FOR DENIAL OF APPLICATION**

2 **(Failure to Pay December 2015 Annual Fee and Delinquent Fee)**

3 37. Respondent's application is subject to denial under Code section 94930.5, subdivision
4 (d), in conjunction with California Code of Regulations, title 5, sections 74000 and 74006,
5 because Respondent failed to submit the December 2015 Annual Fee and delinquent fee. Failure
6 to pay the annual fee renders Respondent ineligible for renewal pursuant to California Code of
7 Regulations, title 5, section 71485. Complainant realleges paragraphs 17 through 36.

8 **SIXTH CAUSE FOR DENIAL OF APPLICATION**

9 **(Failure to Maintain Current Course Catalog on Website)**

10 38. Respondent's application is subject to denial under Code section 94913, in
11 conjunction with California Code of Regulations, title 5, section 71810, subdivision (a), because
12 Respondent failed to maintain a current course catalog on its website. In particular, at the time of
13 Respondent's application, it maintained on its website a course catalog that stated the catalog was
14 valid from January 2014 through December 2014. The catalog was not current because it did not
15 specify a beginning date and ending date; instead, it generically listed the beginning and ending
16 months without specifying the relevant day for each month. Following the denial of Respondent's
17 application, Respondent changed the course catalog's beginning and ending dates to January 1,
18 2014 and December 31, 2014, respectively. A review of Respondent's website on January 30,
19 2017 revealed that Respondent is still not complying with section 71810, as its course catalog for
20 school year 2016-2017 is not current. The course catalog does specify a beginning and ending
21 date. Complainant realleges paragraphs 17 through 37.

22 **SEVENTH CAUSE FOR DENIAL OF APPLICATION**

23 **(Failure to Submit Substantiating Data)**

24 39. Respondent's application is subject to denial under California Code of Regulations,
25 title 5, section 74112, subdivision (h), because Respondent did not submit substantiating data in
26 support of the SPFS for calendar years 2013 and 2014. Complainant realleges paragraphs 17
27 through 38.

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1 **EIGHTH CAUSE FOR DENIAL OF APPLICATION**

2 **(Failure to Provide Accurate Placement Rates)**

3 40. Respondent's application is subject to denial under Code sections 94910, subdivision
4 (b), and 94929.5, subdivision (a)(1), in conjunction with California Code of Regulations, title 5,
5 section 74112, subdivisions (e) and (i), because Respondent failed to provide prospective students
6 with, and failed to annually report to the Bureau, an accurate job placement rate. In particular,
7 Respondent's SPFS for calendar years 2013 and 2014 indicates that 26 people graduated, 14 were
8 available for employment, and 13 were employed in the field, leading to a reported placement rate
9 of 92 percent. Based on Respondent's own figures, there were only 14 graduates, not 26.
10 Complainant realleges paragraphs 17 through 39.

11 **NINTH CAUSE FOR DENIAL OF APPLICATION**

12 **(Failure to Correctly Calculate 2014 Placement Rate)**

13 41. Respondent's application is subject to denial under California Code of Regulations,
14 title 5, section 74112, subdivisions (e) and (l), because Respondent reported that in 2014 its
15 placement rate was four percent when in fact, based on Respondent's own figures, it was one-
16 hundred percent. Pursuant to California Code of Regulations, title 5, section 74112, subdivision
17 (l), the placement rate is calculated by dividing the number of graduates gainfully employed in
18 the field by the number of graduates available for employment. Complainant realleges paragraphs
19 17 through 40.

20 **TENTH CAUSE FOR DENIAL OF APPLICATION**

21 **(Failure to Disclose Substantiating Data for Salary Disclosure)**

22 42. Respondent's application is subject to denial under Code section 94910, subdivision
23 (f)(3), because Respondent failed to disclose in its SPFS for calendar years 2013 and 2014 a
24 statement informing readers where they may obtain from Respondent a list of the employment
25 positions determined to be within the field for which a student received education and training for
26 the calculation of job placement rates. Complainant realleges paragraphs 17 through 41.

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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Director of the Department of Consumer Affairs issue a decision:

1. Denying the application of Training Institute for Addiction Counselors for a Renewal of Approval to Operate and Offer Educational Program for Non-Accredited Institutions; and,
2. Taking such other and further action as deemed necessary and proper.

DATED: 12/15/17



DR. MICHAEL MARION, JR.
Bureau Chief
Bureau for Private Postsecondary Education
Department of Consumer Affairs
State of California
Complainant

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