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7  
8 **BEFORE THE**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
9 **FOR THE BUREAU FOR PRIVATE POSTSECONDARY EDUCATION**  
**STATE OF CALIFORNIA**

10  
11 In the Matter of the Statement of Issues  
Against:

Case No. 998641

12  
13 **CHONG SHIN UNIVERSITY; KEUN SOO**  
**KIM, Owner**

**FIRST AMENDED STATEMENT OF**  
**ISSUES**

14 **Application for Approval to Operate an**  
**Institution Non Accredited Applicant**

15  
16 Respondent.

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18  
19 Complainant alleges:

20  
21 **PARTIES**

22 1. Joanne Wenzel (Complainant) brings this Statement of Issues solely in her official  
23 capacity as the Chief of the Bureau for Private Postsecondary Education, Department of  
24 Consumer Affairs.

25 2. On or about July 23, 2010, the Bureau for Private Postsecondary Education received  
26 an Application for Renewal of Approval to Operate an Institution Non Accredited from Chong  
27 Shin University; Keun Soo Kim (Respondent). On or about July 23, 2010, Keun Soo Kim  
28 certified under penalty of perjury to the truthfulness of all statements, answers, and

1 representations in the application On June 8, 2011, the Bureau sent a deficiency letter to the  
2 Respondent explaining that they had submitted the wrong application. On July 28, 2011, the  
3 Bureau received an Application for Approval to Operate an Institution Non Accredited. The  
4 Bureau issued a Notice of Denial of the application on September 21, 2012. On August 30, 2013  
5 the Bureau issued an Addendum to the Notice of Denial.

### 6 JURISDICTION

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

11 4. Business and Professions Code section 141 states:

12 "(a) For any licensee holding a license issued by a board under the jurisdiction of the  
13 department, a disciplinary action taken by another state, by any agency of the federal government,  
14 or by another country for any act substantially related to the practice regulated by the California  
15 license, may be a ground for disciplinary action by the respective state licensing board. A  
16 certified copy of the record of the disciplinary action taken against the licensee by another state,  
17 an agency of the federal government, or another country shall be conclusive evidence of the  
18 events related therein.

19 "(b) Nothing in this section shall preclude a board from applying a specific statutory  
20 provision in the licensing act administered by that board that provides for discipline based upon a  
21 disciplinary action taken against the licensee by another state, an agency of the federal  
22 government, or another country."

23 5. Business and Professions Code section 480 states:

24 "(a) A board may deny a license regulated by this code on the grounds that the applicant has  
25 one of the following:

26 "(3) (A) Done any act that if done by a licentiate of the business or profession in question,  
27 would be grounds for suspension or revocation of license."

28 6. Business and Professions Code section 22 defines Board as:

1 “Board’, as used in any provision of this Code, refers to the Board in which the  
2 administration of the provision is vested, and unless otherwise expressly provided, shall include  
3 “bureau,” “commission,” “committee,” “department,” “division,” “examining committee,”  
4 “program,” and “agency.”

5 7. Code section 94885<sup>1</sup> states:

6 “The bureau shall, by January 1, 2011, adopt by regulation minimum operating standards  
7 for an institution that shall reasonably ensure that all of the following occur:

8 “(a) The content of each educational program can achieve its stated objective.

9 “(b) The institution maintains specific written standards for student admissions for each  
10 educational program and those standards are related to the particular educational program.

11 “(c) The facilities, instructional equipment, and materials are sufficient to enable students  
12 to achieve the educational program's goals.

13 “(d) The institution maintains a withdrawal policy and provides refunds.

14 “(e) The directors, administrators, and faculty are properly qualified.

15 “(f) The institution is financially sound and capable of fulfilling its commitments to  
16 students.

17 “(g) That, upon satisfactory completion of an educational program, the institution gives  
18 students a document signifying the degree or diploma awarded.

19 “(h) Adequate records and standard transcripts are maintained and are available to  
20 students.

21 “(i) The institution is maintained and operated in compliance with this chapter and all  
22 other applicable ordinances and laws.

23 8. Code section 94886 states:

24 “Except as exempted in Article 4 (commencing with Section 94874) or in compliance with  
25 the transition provisions in Article 2 (commencing with Section 94802), a person shall not open,  
26 conduct, or do business as a private postsecondary educational institution in this state without

27 \_\_\_\_\_  
28 <sup>1</sup> California Private Postsecondary Education Act of 2009, Ed. Code §§ 94800 et seq.

1 obtaining an approval to operate under this chapter.”

2 9. Code section 94887:

3 “An approval to operate shall be granted only after an applicant has presented sufficient  
4 evidence to the bureau, and the bureau has independently verified the information provided by the  
5 applicant through site visits or other methods deemed appropriate by the bureau, that the applicant  
6 has the capacity to satisfy the minimum operating standards. The bureau shall deny an application  
7 for an approval to operate if the application does not satisfy those standards.”

8 10. Code section 94897 subdivision (i) states:

9 “An institution shall not do any of the following:

10 ...

11 “(i) Use a name in any manner improperly implying any of the following:

12 (1)The institution is affiliated with any government agency, public or private  
13 corporation, agency, or association if it is not, in fact, thus affiliated.

14 (2)The institution is a public institution.

15 (3)The institution grants degrees, if the institution does not grant degrees.”

16 ....”

17 11. Code section 94909 provides minimum content requirements for the educational  
18 institution’s catalog.

19 12. Code section 94911 provides the minimum requirements for the educational  
20 institution’s enrollment agreement.

21 **REGULATORY PROVISIONS**

22 13. California Code of Regulations, title 5, division 7.5, section 71100 states:

23 “(a) An applicant seeking approval to operate pursuant to Section 94886 of the Code,  
24 other than Approval to Operate by Accreditation pursuant to Section 94890(a)(1) of the Code,  
25 shall complete the "Application for Approval to Operate for an Institution Not Accredited," Form  
26 Application 94886 (rev. 2/10). An applicant seeking approval to operate by accreditation pursuant  
27 to Section 94890(a)(1) of the Code shall comply with section 71390.

28 “(b) An applicant shall submit the completed form, the information or documentation,

1 required by this Article, the appropriate application fee as provided in Section 94930.5(a)(1) of  
2 the Code, and any appropriate annual fee as required by Article 1 of Chapter 5 of this Division, to  
3 the Bureau.

4 “(c) An application that fails to contain all of the information required by this article shall  
5 render it incomplete.”

6 14. California Code of Regulations, title 5, division 7.5, section 71140, subdivision (c)  
7 states in part: “[t]he institution shall identify the chief executive officer, chief operating officer,  
8 and chief academic officer and describe their education, experience, and qualifications to perform  
9 their duties and responsibilities.”

10 15. California Code of Regulations, title 5, division 7.5, section 71170 states: “The  
11 institution shall describe in detail its mission and objectives.”

12 16. California Code of Regulations, title 5, division 7.5, section 71210 states:

13 “(a) The institution shall identify and describe the educational program it offers, or  
14 proposes to offer. If the educational program is a degree program, the institution shall identify the  
15 full title which it will place on each degree awarded.

16 “(b) In addition to the general title, such as "Bachelor of Arts" or "Master of Science,"  
17 each degree title shall include the name of a specific major field of learning involved.

18 “(c) In addition, the institution shall list the following for each educational program  
19 offered:

20 “(5) The method of instruction;

21 “(6) The graduation requirements”

22 ....”

23 17. California Code of Regulations, title 5, division 7.5, section 71865 subdivision (b)  
24 states:

25 “(b) A professional Doctoral degree may only be awarded to a student who has completed a  
26 prescribed level of study normally requiring a minimum of three academic years of full-time  
27 graduate study or the equivalent in part-time study; or, if the program leads to a profession or  
28 occupation requiring state licensure, which satisfies the requirements of the state agency. The

1 degree shall include the name of the field in which it is offered (e.g., Juris Doctor or Doctor of  
2 Music).

3 18. California Code of Regulations, title 5, division 7.5, section 71300 states:

4 “The institution shall submit a copy of the document that is awarded to a graduating student  
5 upon successful completion of each educational program.”

6 19. California Code of Regulations, title 5, division 7.5, section 71310 states:

7 “(a) The Form Application 94886 shall contain a description of how records required by  
8 Article 9 of the Act or this chapter are or will be organized and maintained, the types of  
9 documents contained in student files, how the records are stored, and whether academic and  
10 financial records are maintained in separate files. The description shall include a statement of the  
11 institution's procedures for security and safekeeping of records.

12 (b) The description shall include the name, physical address, email address, and  
13 telephone number of the custodian of records, and the physical addresses and telephone numbers  
14 of the offices or buildings where the records will be maintained.”

15 20. California Code of Regulations, title 5, division 7.5, section 71320 states:

16 “The Form Application 94886 shall contain a description of the procedures used by the  
17 institution to assure that it is maintained and operated in compliance with the Act and  
18 this Division.”

19 21. California Code of Regulations, title 5, division 7.5, section 71760 states:

20 “Each institution shall develop and maintain adequate procedures used by the institution to  
21 assure that it is maintained and operated in compliance with the Act and this Division.”

22 22. California Code of Regulations, title 5, division 7.5, section 71770 states:

23 “(a) The institution shall establish specific written standards for student admissions for each  
24 educational program. These standards shall be related to the particular educational program. An  
25 institution shall not admit any student who is obviously unqualified or who does not appear to  
26 have a reasonable prospect of completing the program. In addition to any specific standards for an  
27 educational program, the admissions standards must specify as applicable that:

28

1           “(1) Each student admitted to an undergraduate degree program, or a diploma  
2 program, shall possess a high school diploma or its equivalent, or otherwise successfully take and  
3 pass the relevant examination as required by section 94904 of the Code.”

4           ....”

5           “(b) The institution shall specify the maximum credit it will transfer from another  
6 institution for each educational program, and the basis upon which the transferred credit  
7 will be awarded.

8           “(1) Except as limited by subdivision (c) of this section, a maximum of 75 percent of  
9 the units or credit that may be applied toward the award of a bachelor's degree may be derived  
10 from a combination of any or both of the following:

11           “(A) Units earned at institutions approved by the Bureau, public or private  
12 institutions of higher learning accredited by an accrediting association recognized by the U. S.  
13 Department of Education, or any institution of higher learning, including foreign institutions, if  
14 the institution offering the undergraduate program documents that the institution of higher  
15 learning at which the units were earned offers degree programs equivalent to degree programs  
16 proved by the Bureau or accredited by an accrediting association recognized by the U.S.  
17 Department of Education;”

18           “(B) Challenge examinations and standardized tests such as the College Level  
19 Placement Tests (CLEP) for specific academic disciplines.”

20           “(2) No more than 20% of graduate semester units or the equivalent in other units  
21 awarded by another institution may be transferred for credit toward a Master's degree. An  
22 institution may accept transfer credits only from the institutions of higher learning described in  
23 subsection (1)(A).

24           “(3) No more than 30 graduate semester credits or its equivalent awarded by another  
25 institution may be credited toward a doctoral degree. This subdivision does not apply to graduate  
26 programs that lead to a profession or an occupation requiring state licensure where the licensing  
27 agency has a regulation permitting a different standard.

28           ...”

1 23. California Code of Regulations, title 5, division 7.5, section 71710 states:

2 "In order to meet its mission and objectives, the educational program defined in section  
3 94837 of the Code shall be comprised of a curriculum that includes:

4 "(a) those subject areas that are necessary for a student to achieve the educational  
5 objectives of the educational program in which the student is enrolled;"

6 "(b) subject areas and courses or modules that are presented in a logically organized  
7 manner or sequence to students;"

8 "(c) course or module materials that are designed or organized by duly qualified  
9 faculty." "For each course or module, each student shall be provided with a syllabus or course  
10 outline that contains:

11 "(1) a short, descriptive title of the educational program;"

12 "(2) a statement of educational objectives;"

13 "(3) length of the educational program;"

14 "(4) sequence and frequency of lessons or class sessions;"

15 "(5) complete citations of textbooks and other required written materials;"

16 "(6) sequential and detailed outline of subject matter to be addressed or a list of  
17 skills to be learned and how those skills are to be measured;"

18 "(7) instructional mode or methods."

19 "(d) if degree granting, require research of an appropriate degree that utilizes a library  
20 and other learning resources;"

21 "(e) specific learning outcomes tied to the sequence of the presentation of the material to  
22 measure the students' learning of the material; and"

23 "(f) evaluation by duly qualified faculty of those learning outcomes."

24 24. California Code of Regulations, title 5, division 7.5, section 71220 states:

25 "For each educational program that the institution offers or proposes to offer, the Form  
26 Application 94886 shall contain a statement that the educational program meets the requirements  
27 of section 71710, as well as the following:

28 "(a) A description of the educational program."



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...  
“(e) A description of the learning, skills, and other competencies to be acquired by students who complete the educational program.”

25. California Code of Regulations, title 5, division 7.5, section 71230 states:

“If the institution offers an educational program, or a portion of it, in a language other than English, the Form Application 94886 shall contain a description of all of the following for each educational program or portion thereof.”

“(a) The language in which each educational program will be offered.”

“(b) A statement that the institution has contracted with sufficient duly qualified faculty who will teach each language group of students.”

“(c) The language of the textbooks and other written materials to be used by each language group of students.”

26. California Code of Regulations, title 5, division 7.5, section 71850 states:

“Graduation requirements for an undergraduate degree program shall meet minimum credit requirements and shall include provisions for general education appropriate to the level and type of degree. The institution shall specify the distribution of general education credit requirements by subject area for each undergraduate degree program.

“(a) A Bachelor's degree may be awarded to a student whom the institution can document has achieved sequential learning equivalent in general education and equivalent in depth of achievement in a designated major field to that acquired in four years of study beyond high school, as measured by a minimum of 120 semester credits or its equivalent. At least 25 percent of the credit requirements for a Bachelor's degree shall be in general education.”

....”

27. California Code of Regulations, title 5, division 7.5, section 71865 subdivision (a) states:

“(a) A Master's degree may only be awarded to a student who demonstrates at least the achievement of learning in a designated major field that is equivalent in depth to that normally

1 acquired in a minimum of 30 semester credits or its equivalent or one year of study beyond the  
2 Bachelor's degree.”

3 ....”

4 28. California Code of Regulations, title 5, division 7.5, section 71720 subdivisions (a)  
5 and (b) state:

6 “(a) An Educational Program Leading to a Degree.

7 “(1) An institution offering an educational program that leads to a degree shall  
8 employ duly qualified faculty sufficient in number to provide the instruction, student advisement,  
9 and learning outcomes evaluation necessary for the institution to document its achievement of its  
10 stated mission and objectives, and for students to achieve the specific learning objectives of each  
11 course offered;

12 “(2) Each institution shall develop and implement written policies and procedures  
13 providing for the participation by duly qualified faculty in the conducting of research,  
14 development of curricula, academic planning, enforcement of standards of academic quality,  
15 pursuit of academic matters related to the institution's mission and objectives, establishment of  
16 criteria for contracting with new faculty, and evaluation of faculty credentials;

17 “(3) In determining the number of faculty sufficient to satisfy subdivision (a)(1) of  
18 this section and to implement the policies established pursuant to subdivision (a)(2) of this  
19 section, the institution shall base its faculty requirements on all of the following factors:

20 “(A) The educational level and number of students;

21 “(B) The number of hours needed for direct interaction between students and  
22 faculty per course, quarter, semester, or other term;

23 “(C) The number of hours needed to be spent on evaluating written materials  
24 prepared by students, such as distance education, papers, and examinations, per course, quarter,  
25 semester, or other term;

26 “(D) The number of group meetings per course, quarter, semester, or other  
27 term;

28 “(E) The faculty duties established by the institution as required under  
subdivision (a)(2) of this section; and

1                   “(F) The number of hours per week or units per term considered full-time for  
2 faculty in the institution.

3                   “(4) The faculty shall have sufficient expertise to support the institution's awarding of  
4 a degree identifying a specialty or major field of emphasis, demonstrated by, at a minimum:

5                   “(A) That the person possesses one of the following:

6                   1. a degree from: an institution approved by the Bureau or previously  
7 approved by a predecessor agency of the Bureau; or an accredited institution in the United States  
8 or Canada; or other state approved institution that documents that the institution at which the  
9 faculty member earned his or her degree is equivalent to an institution that is approved by the  
10 Bureau; or an institution outside the United States or Canada and in addition provides a  
11 comprehensive evaluation of the degree performed by a foreign credential evaluation service that  
12 is a member of the National Association of Credential Evaluation Services(NACES).

13                   2. a credential generally recognized in the field of instruction.

14                   “(B) The degree, professional license, or credential possessed by the person  
15 shall be at least equivalent to the level of instruction being taught or evaluated;

16                   “(5) The institution's faculty as a whole shall possess a diverse educational  
17 background which shall be demonstrated in part by earned degrees from a variety of colleges and  
18 universities or by credentials generally recognized in the field of instruction;

19                   “(6) When contracting for educational services, the institution shall maintain control  
20 of, and responsibility for, all academic matters, and shall assure that the instruction and faculty  
21 satisfy the standards established by the Act and this chapter;

22                   “(7) The institution shall not employ or continue to employ any faculty who were  
23 adjudicated in a judicial or administrative proceeding as having violated any provision of the Act  
24 or this chapter or as having committed any act that would constitute grounds for the denial of a  
25 license under Section 480 of the Business and Professions Code;

26                   “(8) Each institution shall have a written Academic Freedom Policy which describes  
27 the latitude the institution allows faculty in the classroom so faculty will not inadvertently violate  
28 the principles of academic freedom. These policies shall be made available to any person upon

1 request. The institution shall not take adverse action based on a staff member's exercise of  
2 academic freedom consistent with the institution's policy; and

3 “(9) The institution shall maintain records documenting that each faculty member is  
4 duly qualified and was qualified to perform the duties to which the faculty member was assigned,  
5 including providing instruction, evaluating learning outcomes, evaluating graduate dissertations,  
6 theses, and student projects, and participating on doctoral committees.”

7 “(b) Instructors in an Educational Program Not Leading to a Degree.

8 “(1) An institution shall employ instructors who possess the academic, experiential  
9 and professional qualifications to teach, including a minimum of three years of experience,  
10 education and training in current practices of the subject area they are teaching. If an instructor  
11 does not possess the required three years of experience, education and training in the subject area  
12 they are teaching, the institution shall document the qualifications the instructor possesses that are  
13 equivalent to the minimum qualifications.

14 “(2) Each instructor shall maintain their knowledge by completing continuing  
15 education courses in his or her subject area, classroom management or other courses related to  
16 teaching.

17 “(3) The institution shall not employ or continue to employ an instructor who was  
18 adjudicated in a judicial or administrative proceeding as having violated any provision of the Act  
19 or this chapter, or as having committed any act that would constitute grounds for the denial of a  
20 license under Section 480 of the Business and Professions Code.”

21 ....”

22 29. California Code of Regulations, title 5, division 7.5, section 71260 subdivision (b)  
23 states:

24 ...

25 “(b) For facilities that are leased or rented, the Form Application 94886 shall contain the  
26 name and address of the lessor or landlord, together with a copy of any use, lease, or rental  
27 agreements or the facilities.”

28 ....”

1 **CAUSE FOR DENIAL OF APPLICATION**

2 **(Incomplete Application)**

3 30. Respondent's application is subject to denial under Business and Professions Code  
4 sections 480, subdivision (a)(3)(A), Education Code section 94887 and California Code of  
5 Regulations, title 5, division 7.5, section 71100, in that Respondent submitted an incomplete  
6 application to the Bureau. Each violation is a sole and separate cause for denial. The violations  
7 are as follows:

8 a. No Authority to Operate. On or about July 10, 2013, Respondent was advertizing  
9 the institution as a multiple degree granting institution, in violation of the California Education  
10 Code (CEC) section 94886 as the institution does not have approval to operate and is prohibited  
11 from offering Educational Programs to the public, which includes advertising, publicizing,  
12 soliciting and recruiting.

13 b. Minimum Operating Standards. Respondent failed to provide evidence that the  
14 institution has the capacity to meet the minimum operating standards as follows:

15 1. Respondent failed to submit a current organization chart and description  
16 of job duties and responsibilities, as well as current resumes for the Chief Executive Officer,  
17 Chief Operating Officer and Chief Academic Officer in violation of title 5, division 7.5 of the  
18 California Code of Regulations (CCR), section 71140 subdivisions (a) through (c).

19 2. Respondent failed to provide a comprehensive "Mission and Objectives"  
20 in the application. This is a violation of CCR section 71170.

21 3. In response to section 12, part 5 of the application, the Respondent failed  
22 to indicate the method of instruction for all programs in violation of CCR section 71210  
23 subdivision (c)(5).

24 4. The Respondent failed to state the graduation requirements for each of the  
25 educational programs, nor did it specify whether any of the programs require a comprehensive  
26 examination or research paper in order to graduate. This is a violation of CCR section 71210  
27 subdivision (c)(6).

28

1                   5.     The Respondent's graduation requirements for the Doctorate of Ministry  
2 is only two years, in violation with CCR section 71865 subdivision (b), which requires a  
3 minimum of three academic years of full time graduate study or its equivalent part time study.

4                   6.     The Respondent failed to provide a copy of the document awarded to  
5 graduating students upon completion of each educational program. Specifically, the Respondent  
6 submitted three (3) documents, which do not represent each of the six (6) proposed educational  
7 programs offered and the degree titles on the submitted documents do not correspond with the  
8 title of the education program. This is a violation of CCR section 71300.

9                   7.     The Respondent failed to adequately describe how the institution will  
10 organize and maintain all required documentation for each student file in violation of CCR  
11 section 71310 subdivision (a), which requires a description of how student files will be  
12 maintained safely and securely.

13                   8.     The Respondent failed to indicate which United States Department of  
14 Education approved "Ability-To-Benefit" (ATB) test will be used to admit students that do not  
15 have a high school diploma or its equivalent, nor did it submit a written procedure and required  
16 passing score for the ATB test. This is a violation of CCR section 71770 subdivision (a)(1) and  
17 Code section 94904.

18                   9.     The Respondent failed to adequately describe each educational program  
19 in violation of CCR sections 71220 subdivision (a) and 71710.

20                   10.    The Respondent failed to specify the maximum credit it will transfer from  
21 another institution for each educational program and the basis upon which the transferred credit  
22 will be awarded. This is a violation of CCR section 71770 subdivision (b)(1)(A-B), (2) and (3).

23                   11.    The Respondent failed to provide a description of the learning skills and  
24 other competencies to be acquired by students who complete the educational program. This is a  
25 violation of CCR section 71220 subdivision (e).

26                   12.    The Respondent failed to provide an adequate response to section 14 of  
27 the application relating to the language of instruction it will be using, including the use of all text  
28 books and other written materials. The Respondent further failed to provide a list of duly

1 qualified faculty who will provide instruction in the Korean language. These are violations of  
2 CCR section 71230 subdivisions (a) through (c).

3 13. The Respondent failed to provide sufficient documentation that it has  
4 developed syllabi for the Bachelor, Master and Doctorate programs in violation of CCR section  
5 71710 subdivisions (c) through (f).

6 14. The respondent failed to provide an adequate description of the level of  
7 rigor for each educational program offered in violation of CCR sections 71850 subdivision (a)  
8 and 71865 subdivision (a).

9 15. The Respondent failed to provide adequate evidence of duly qualified  
10 faculty in violation of CCR 71720 subdivisions (a)(4)(A) and (b).

11 16. The Respondent failed to provide copies of faculty contracts so as to  
12 evidence actual employment by the institution. This is a violation of CCR 71720 subdivision (a).

13 17. The Respondent failed to provide sufficient evidence to determine  
14 whether the six (6) level "PRO LINGO ENGLISH" course outline written by M.C. Hagen will be  
15 used for the Intensive English Program, nor was a list of qualified faculty provided for instruction  
16 at each of the six (6) levels. This is a violation of CCR section 71720 subdivision (b)(1) through  
17 (3).

18 18. The Respondent failed to provide a written policy and procedure covering  
19 the participation of duly qualified faculty in conducting research, development of curricula,  
20 academic planning, enforcement standards of academic quality, and pursuit of academic matters  
21 related to the institution's mission and objections. This is a violation of CCR section 71720  
22 subdivision (a)(2).

23 19. The Respondent failed to provide an updated lease agreement in violation  
24 of CCR section 71260 subdivision (b).

25 c. Improper Use of Acronym. Respondent is improperly using the acronym  
26 "CSU" in its mission statement and on website in violation of CEC section 94897, subdivision  
27 (i)(2) as it implies the institution is affiliated with the California State University, a public  
28 educational system.

1 d. Custodian of Records. Respondent failed to provide the name of the current  
2 custodian of records in violation of CCR section 71310 subdivision (b).

3 e. Comprehensive Self-Monitoring Procedure. The Respondent failed to provide  
4 a comprehensive self-monitoring procedure, ensuring that the institution is operated and  
5 maintained in compliance with the California Private Postsecondary Education Act of 2009 and  
6 title 5 of the CCR. This is a violation of CCR sections 71320 and 71760.

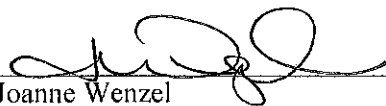
7 f. Written Standards for Admission to ESL Program. The Respondent failed to  
8 provide written standards for student admission to the ESL program, nor did it explain the process  
9 and procedure for placing students in the appropriate ESL level. This is a violation of CCR  
10 section 71770 subdivision (a).

11  
12 **PRAYER**

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

- 16 1. Denying the application of Chong Shin University; Keun Soo Kim for an Application  
17 for Approval to Operate an Institution Non Accredited;  
18 2. Taking such other and further action as deemed necessary and proper.

19 DATED: 6/4/14

20   
21 Joanne Wenzel  
22 Chief  
23 Bureau for Private Postsecondary Education  
24 Department of Consumer Affairs  
25 State of California  
26 Complainant

24 LA2013508794  
25 51415074.doc