



Bureau for Private Postsecondary Education
 2535 Capitol Oaks Drive, Suite 400, Sacramento, CA 95833
 P.O. Box 980818, West Sacramento, CA 95798-0818
 P (916) 431-6959 F (916) 263-1897 www.bppe.ca.gov
NOTICE TO COMPLY – CA 3406781 0516 (Ed. Code § 94935, 5 CCR § 75010)



Institution Name:	Greater Sacramento Urban League	Institution Telephone:	916-286-8600
Institution Code:	3406781	Administrator Name:	Kevin Daniel
Street Address:	3725 Marysville Blvd Sacramento, CA 95838	Date of Inspection:	May 17, 2016

Nature and Facts of the Violation(s), Including a Reference to the Statute or Regulation Violated, and Manner in Which the Institution Must Correct the Violation to Achieve Compliance:

STUDENT TUITION RECOVERY FUND

Education Code (CEC) or Code of Regulations (CCR)	Subsection, Description, and Required Correction
CCR §76130. Collection and Submission of Assessment	<p>(b) A qualifying institution shall complete the STRF Assessment Reporting Form (Rev. 2/10) and remit it with the STRF assessments collected from students to be received by the Bureau no later than the last day of the month following the close of the quarter as follows:</p> <ul style="list-style-type: none"> (1) April 30 for the first quarter, (2) July 31 for the second quarter, (3) October 31 for the third quarter, and (4) January 31 for the fourth quarter. If the due date falls on a Saturday, Sunday or State or federal holiday, the due date shall be extended to the next regular business day for the Bureau. <p>If the due date falls on a Saturday, Sunday, or State or federal holiday, the due date shall be extended to the next regular business day for the Bureau.</p> <p>The institution did not provide the Bureau their 2015 STRF Assessment Reporting Forms for the second quarter.</p> <p>To remedy this violation, the institution shall submit the Second Quarter 2015 STRF Assessment Reporting Form.</p> <p>The Second Quarter 2015 STRF Assessment Reporting Forms shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
CCR §76140. Record-Keeping Requirements	<p>(a) A qualifying institution shall collect and maintain records of student information to substantiate the data reported on the STRF Assessment Reporting Form and records of the students' eligibility under the Fund. Such records shall include the following for each student:</p>

Notice to Comply – CA 3406781 0516

Inspector's Initial: *MW*
 Administrator's Initial: *KD*

	<p>(1) Student identification number, (2) First and last names, (3) Email address, (4) Local or mailing address, (5) Address at the time of enrollment, (6) Home address, (7) Date enrollment agreement signed, (8) Courses and course costs, (9) Amount of STRF assessment collected, (10) Quarter in which the STRF assessment was remitted to the Bureau, (11) Third-party payer identifying information, (12) Total institutional charges charged, and (13) Total institutional charges paid.</p> <p>The institution did not provide records of STRF eligibility for all students.</p> <p>To remedy this violation, the institution shall establish and maintain records of eligibility for each student, and provide the records for the last two quarters to the Bureau.</p> <p>The STRF eligibility documentation shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CCR §76140. Records-Keeping Requirements</p>	<p>(b) The qualifying institution shall maintain the data required under this section in an electronic format that is readily available and open to inspection by the Bureau upon request. The institution shall make the records immediately available to a Bureau representative conducting a site inspection or, upon written request, shall provide a copy within 14 calendar days of the request. All records shall be provided to the Bureau in an intelligible and orderly manner and in an electronic format.</p> <p>The institution did not maintain the 13 required data points for each student identified in 5, CCR §76140(a) in an electronic format. The documentation was not made immediately available.</p> <p>To remedy this violation, the institution shall maintain the required data points in an electronic format and in an intelligible and orderly manner.</p> <p>The STRF eligibility documentation shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>

INSTITUTIONAL WEBSITE AND ADVERTISEMENTS

Education Code	Subsection , Description, and Required Correction
<p>CEC §94913. Institutional Web Site</p>	<p>(a) An institution that maintains an Internet Web site shall provide on</p>

Notice to Comply – CA 3406781 0516

Inspector's Initial: *MMW*

Administrator's Initial: *KD*

<p>Requirements</p>	<p>that Internet Web site all of the following: (1) The school catalog.</p> <p>The institution's website does not contain the current corrected school catalog.</p> <p>To remedy the violation, the institution's current website shall be updated to provide a current corrected school catalog.</p> <p>A printout of or a link to the updated website shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94913. Institutional Web Site Requirements</p>	<p>(a) An institution that maintains an Internet Web site shall provide on that Internet Web site all of the following: (2) A School Performance Fact Sheet for each educational program offered by the institution.</p> <p>The institution's website does not contain 2013/2014 Performance Fact Sheets with accurate information.</p> <p>To remedy the violation, the institution's website shall be updated to contain the updated and corrected 2013/2014 Performance Fact Sheets.</p> <p>A printout of or a link to the updated website shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94913. Institutional Web Site Requirements</p>	<p>(a) An institution that maintains an Internet Web site shall provide on that Internet Web site all of the following: (3) Student brochures offered by the institution.</p> <p>The institution's website does not contain documentation of student brochures offered by the institution.</p> <p>To remedy the violation, the institution's website shall be updated to include student brochures offered by the institution.</p> <p>A printout of or a link to the updated website shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94913. Institutional Web Site Requirements</p>	<p>(b) An institution shall include information concerning where students may access the bureau's Internet Web site anywhere the institution identifies itself as being approved by the bureau.</p> <p>The institution's website does not include information concerning where students may access the bureau's Internet website anywhere the institution identifies itself as being approved by the bureau.</p> <p>The institution states on the "Mission, Vision, and History" page of</p>

	<p>their website, "GSUL is recognized by the State of California as an approved Private Post-secondary and Vocational Education institution."</p> <p>To remedy the violation, the institution's website shall be updated to include the bureau's contact information <i>any</i> time the institution states their approval to operate.</p> <p>A printout of or a link to the updated website shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CCR §74140. Retention of Advertising</p>	<p>Every institution shall retain, for a minimum of five years, copies of all advertising, including</p> <ul style="list-style-type: none"> (a) flyers, brochures, newspaper, and other print advertisements, (b) scripts for, and audio and video recordings of, broadcast advertisements, and (c) internet content, and (d) scripts for telephone solicitations. <p>The institution shall make these records immediately available for inspection and copying during normal business hours to site visit teams and the Bureau.</p> <p>The institution did not provide records of advertisements, including flyers, brochures, and other print advertisements; audio and video scripts for broadcast advertisements; internet advertisements or content; or telephone solicitation scripts.</p> <p>To remedy the violation, the institution shall retain and maintain for a minimum period of five years, copies of all advertising. The institution shall provide documentation of their current advertisements in any of the formats identified above from the past five years.</p> <p>Documentation of the current advertising shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>§94897. Prohibited Business Practices</p>	<p>An institution shall not do any of the following:</p> <ul style="list-style-type: none"> (1) Use the terms "approval," "approved," "approval to operate," or "approved to operate" without stating clearly and conspicuously that approval to operate means compliance with state standards as set forth in this chapter. If the bureau has granted an institution approval to operate, the institution may indicate that the institution is "licensed" or "licensed to operate," but may not state or imply either of the following: <ul style="list-style-type: none"> (1) The institution or its educational programs are endorsed or recommended by the state or by the bureau. (2) The approval to operate indicates that the institution exceeds minimum state standards as set forth in this chapter.

	<p>The institution's website states the institution is approved by the Bureau on the "Mission, Vision, and History" page of their website, and "approved to operate by the Bureau for Private Postsecondary Education" on the "Programs and Services" page of their website. Neither page explained what approval to operate means.</p> <p>To remedy this violation, the institution's website shall be updated with the explanation that approval to operate means compliance with minimum standards set forth in the Ed. Code and the Regulations.</p> <p>The updates to the website shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
--	--

SCHOOL CATALOG

Education Code (CEC) or Code of Regulations (CCR)	Subsection , Description, and Required Correction
<p>CCR §71810. Catalog.</p>	<p>(b) The catalog shall contain the information prescribed by Section 94909 of the Code and all of the following: (13) Housing information including all of the following: (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</p> <p>The catalog does not contain the availability of housing located reasonably near the institution's facilities and an estimation of the approximate cost of housing.</p> <p>To remedy this violation, the current catalog shall be updated to contain the availability of housing located reasonably near the institution's facilities and an estimation of the approximate cost of housing.</p> <p>The catalog correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>

ENROLLMENT AGREEMENT

Education Code (CEC) or Code of Regulations (CCR)	Subsection , Description, and Required Correction
<p>CCR §71800. Enrollment Agreement.</p>	<p>In addition to the requirements of section 94911 of the Code, an institution shall provide to each student an enrollment agreement that contains at the least the following information: (b) Period covered by the enrollment agreement.</p> <p>The enrollment agreement does not contain the period covered by the enrollment agreement. The period covered by the enrollment agreement shall be identified in addition to the program start date</p>

Notice to Comply – CA 3406781 0516

Inspector's Initial: *MM*

Administrator's Initial: *LD*

	<p>and scheduled completion date, even if the date range is the same.</p> <p>To remedy the violation, the current enrollment agreement shall be updated to contain the period covered by the enrollment agreement.</p> <p>The enrollment agreement correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CCR §71800. Enrollment Agreement.</p>	<p>In addition to the requirements of section 94911 of the Code, an institution shall provide to each student an enrollment agreement that contains at the least the following information:</p> <p>(e) Itemization of all institutional charges and fees including, as applicable:</p> <ul style="list-style-type: none"> (1) tuition; (2) registration fee (non-refundable); (3) equipment; (4) lab supplies or kits; (5) Textbooks, or other learning media; (6) uniforms or other special protective clothing; (7) in-resident housing; (8) tutoring; (9) assessment fees for transfer of credits; (10) fees to transfer credits; (11) Student Tuition Recovery Fund fee (non-refundable); (12) any other institutional charge or fee. <p>The enrollment agreement does not contain a complete list of itemized charges, bolded above.</p> <p>To remedy the violation, the current enrollment agreement shall contain a list of itemize charges for fees that may be refunded to students in the event of cancellation or withdrawal.</p> <p>The enrollment agreement correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94911. Minimum Requirements for Enrollment Agreements</p>	<p>(b) A schedule of total charges, including a list of any charges that are nonrefundable and the student's obligations to the Student Tuition Recovery Fund, clearly identified as nonrefundable charges.</p> <p>The enrollment agreement does not contain a schedule of total charges that includes a list of charges that are nonrefundable. The enrollment agreement does not include the student's obligations to the Student Tuition Recovery Fund.</p> <p>To remedy the violation, the current enrollment agreement shall be updated to include a schedule of total charges that includes a list of nonrefundable charges and the student's obligation to the Student Tuition Recovery Fund.</p>

	<p>The enrollment agreement correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CCR §76215. Student Tuition Recovery Fund Disclosures.</p>	<p>(a) A qualifying institution shall include the following statement on both its enrollment agreement for an educational program and its current schedule of student charges: "You must pay the state-imposed assessment for the Student Tuition Recovery Fund (STRF) if all of the following applies to you: 1. You are a student in an educational program, who is a California resident, or are enrolled in a residency program, and prepay all or part of your tuition either by cash, guaranteed student loans, or personal loans, and 2. Your total charges are not paid by any third-party payer such as an employer, government program or other payer unless you have a separate agreement to repay the third party. You are not eligible for protection from the STRF and you are not required to pay the STRF assessment, if either of the following applies: 1. You are not a California resident, or are not enrolled in a residency program, or 2. Your total charges are paid by a third party, such as an employer, government program or other payer, and you have no separate agreement to repay the third party." (b) In addition to the statement described under subdivision (a) of this section, a qualifying institution shall include the following statement on its current schedule of student charges: "The State of California created the Student Tuition Recovery Fund (STRF) to relieve or mitigate economic losses suffered by students in educational programs who are California residents, or are enrolled in a residency programs attending certain schools regulated by the Bureau for Private Postsecondary and Vocational Education. You may be eligible for STRF if you are a California resident or are enrolled in a residency program, prepaid tuition, paid the STRF assessment, and suffered an economic loss as a result of any of the following: 1. The school closed before the course of instruction was completed. 2. The school's failure to pay refunds or charges on behalf of a student to a third party for license fees or any other purpose, or to provide equipment or materials for which a charge was collected within 180 days before the closure of the school. 3. The school's failure to pay or reimburse loan proceeds under a federally guaranteed student loan program as required by law or to pay or reimburse proceeds received by the school prior to closure in excess of tuition and other costs. 4. There was a material failure to comply with the Act or this Division within 30 days before the school closed or, if the material failure began earlier than 30 days prior to closure, the period determined by the Bureau. 5. An inability after diligent efforts to prosecute, prove, and collect on</p>

	<p>a judgment against the institution for a violation of the Act." However, no claim can be paid to any student without a social security number or a taxpayer identification number.</p> <p>The enrollment agreement does not contain the specific required statements verbatim to the quotations above.</p> <p>To remedy the violation, the updated enrollment agreement and current schedule of charges shall be updated to include the specific required statements verbatim to the quotations above.</p> <p>The enrollment agreement correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94911. Minimum Requirements for Enrollment Agreements</p>	<p>(e) (2) The disclosure shall contain the institution's refund policy and a statement that, if the student has received federal student financial aid funds, the student is entitled to a refund of moneys not paid from federal student financial aid program funds.</p> <p>The enrollment agreement does not contain a refund policy consistent with the refund policy identified in the catalog.</p> <p>The enrollment agreement does not contain a statement specifying that, if the student has received federal student financial aid funds, the student is entitled to a refund of moneys not paid from federal student financial aid program funds.</p> <p>To remedy the violation, the current enrollment agreement shall be updated to include a statement specifying that, if the student has received federal student financial aid funds, the student is entitled to a refund of moneys not paid from federal student financial aid program funds.</p> <p>The enrollment agreement correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94911. Minimum Requirements for Enrollment Agreements</p>	<p>(f) A statement specifying that, if the student obtains a loan to pay for an educational program, the student will have the responsibility to repay the full amount of the loan plus interest, less the amount of any refund.</p> <p>The enrollment agreement does not contain a statement specifying that, if the student obtains a loan to pay for an educational program, the student will have the responsibility to repay the full amount of the loan, plus interest, less the amount of any refund.</p> <p>To remedy the violation, the current enrollment agreement shall be updated to contain a statement specifying that, if the student obtains a loan to pay for an educational program, the student will have the</p>

	<p>responsibility to repay the full amount of the loan, plus interest, less the amount of any refund.</p> <p>The enrollment agreement correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94911. Minimum Requirements for Enrollment Agreements</p>	<p>(g) A statement specifying that, if the student is eligible for a loan guaranteed by the federal or state government and the student defaults on the loan, both of the following may occur:</p> <p>(1) The federal or state government or a loan guarantee agency may take action against the student, including applying any income tax refund to which the person is entitled to reduce the balance owed on the loan.</p> <p>(2) The student may not be eligible for any other federal student financial aid at another institution or other government assistance until the loan is repaid.</p> <p>The enrollment agreement does not contain the required statement describing the outcomes if the student defaults on a federal or state government guaranteed loan.</p> <p>To remedy the violation, the current enrollment agreement shall be updated to contain the required statement describing the outcomes if the student defaults on a federal or state government guaranteed loan.</p> <p>The enrollment agreement correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94911. Minimum Requirements for Enrollment Agreements</p>	<p>(h) The transferability disclosure that is required to be included in the school catalog, as specified in paragraph (15) of subdivision (a) of Section 94909.</p> <p>"NOTICE CONCERNING TRANSFERABILITY OF CREDITS AND CREDENTIALS EARNED AT OUR INSTITUTION</p> <p>The transferability of credits you earn at (name of institution) is at the complete discretion of an institution to which you may seek to transfer. Acceptance of the (degree, diploma, or certificate) you earn in (name of educational program) is also at the complete discretion of the institution to which you may seek to transfer. If the (credits or degree, diploma, or certificate) that you earn at this institution are not accepted at the institution to which you seek to transfer, you may be required to repeat some or all of your coursework at that institution. For this reason you should make certain that your attendance at this institution will meet your educational goals. This may include contacting an institution to which you may seek to transfer after attending (name of institution) to determine if your (credits or degree, diploma, or certificate) will transfer."</p> <p>The enrollment agreement does not contain the required</p>

Notice to Comply – CA 3406781 0516

Inspector's Initial: *MMW*

Administrator's Initial: *ED*

	<p>transferability disclosure verbatim to the specific required quotations above. The enrollment agreement does not identify the specific educational program.</p> <p>To remedy the violation, the current enrollment agreement shall be updated to contain the specific required transferability disclosure verbatim to the quotations above. The parentheticals shall be inserted with the appropriate educational program.</p> <p>The enrollment agreement correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94911. Minimum Requirements for Enrollment Agreements</p>	<p>(j) The following statements: (1) "Any questions a student may have regarding this enrollment agreement that have not been satisfactorily answered by the institution may be directed to the Bureau for Private Postsecondary Education at (address*), Sacramento, CA (ZIP Code*), (Internet Web site address*), (telephone and fax numbers*)." </p> <p>*The following may be used for parentheticals: Address: 2535 Capitol Oaks Drive, Suite 400, Sacramento, CA 95833 P.O. Box 980818, West Sacramento, CA 95798-0818 Website Address: www.bppe.ca.gov Telephone and Fax #'s: (888) 370-7589 or by fax (916) 263-1897 (916) 431-6959 or by fax (916) 263-1897</p> <p>The enrollment agreement does not contain the specific required statement verbatim to the quotations above.</p> <p>To remedy the violation, the current enrollment agreement shall be updated to contain the specific required statement verbatim to the quotations above.</p> <p>The enrollment agreement correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94911. Minimum Requirements for Enrollment Agreements</p>	<p>(j) The following statements: (2) "A student or any member of the public may file a complaint about this institution with the Bureau for Private Postsecondary Education by calling (toll-free telephone number*) or by completing a complaint form, which can be obtained on the bureau's Internet Web site (Internet Web site address*)." </p> <p>*The following may be used for parentheticals: Telephone and Fax #'s: (888) 370-7589 or by fax (916) 263-1897 Website Address: www.bppe.ca.gov</p> <p>The enrollment agreement does not contain the specific required</p>

Notice to Comply – CA 3406781 0516

Inspector's Initial: *MW*

Administrator's Initial: *KD*

statement verbatim to the quotations above.

To remedy the violation, the current enrollment agreement shall be updated to contain the specific required statement verbatim to the quotations above.

The enrollment agreement correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.

ANNUAL REPORT & SCHOOL PERFORMANCE FACT SHEET

Education Code or Code of Regulations	Subsection, Description, and Required Correction
CCR §74112. Uniform Data-Annual Report, Performance Fact Sheet	<p>(h) Documentation supporting all data reported shall be maintained by the institution for at least five years from the time included in either an Annual Report or a Performance Fact Sheet, and shall include at a minimum: student name(s), address, phone number, email address, program completed, program start and completion dates, place of employment and position, salary, hours, and a description of all attempts to contact each student. Documentation shall also include the name, email address, phone number, and position or title of the institution's representative who is primarily responsible for obtaining the students' completion, placement, licensing, and salary and wage data, the date that the information was gathered, and copies of notes, letters or emails through which the information was requested and gathered.</p> <p>The institution did not provide documentation to substantiate the data provided in the PFS.</p> <p>To remedy the violation, the institution shall collect and maintain documentation to substantiate the data reported in the current 2013/2014 PFS. The documentation shall contain all elements identified in the Regulation.</p> <p>The corrections to the PFS substantiating documentation shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
CEC §94929.7. Documentation of Performance Date	<p>(a) The information used to substantiate the rates and information calculated pursuant to Sections 94929 and 94929.5 shall do both of the following:</p> <p>(1) Be documented and maintained by the institution for five years from the date of the publication of the rates and information.</p> <p>The institution did not provide documentation of information used to substantiate the rates and information in the Performance Fact Sheet for five years from the date of publication. The institution failed to collect and maintain information to substantiate the license examination passage rates identified in the Performance Fact Sheet.</p> <p>To remedy the violation, the institution shall collect and maintain documentation to substantiate the data reported in the current 2013/2014 PFS for five years from the last date of publication.</p>

Notice to Comply – CA 3406781 0516

Inspector's Initial: *MM*

Administrator's Initial: *VD*

	<p>The corrections to the PFS substantiating documentation shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94929.7. Documentation of Performance Date</p>	<p>(a) The information used to substantiate the rates and information calculated pursuant to Sections 94929 and 94929.5 shall do both of the following: (2) Be retained in an electronic format and made available to the bureau upon request.</p> <p>The institution did not provide information used to substantiate the rates and information in the Performance Fact Sheet in an electronic format.</p> <p>To remedy the violation, the institution shall collect and maintain documentation to substantiate the data reported in the current 2013/2014 PFS in an electronic format.</p> <p>The corrections to the PFS substantiating documentation shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94929.7. Documentation of Performance Date</p>	<p>(a) The information used to substantiate the rates and information calculated pursuant to Sections 94929 and 94929.5 shall do both of the following: (b) An institution shall provide a list of employment positions used to determine the number of graduates employed in the field for purposes of calculating job placement rates pursuant to this article.</p> <p>The institution did not provide a list of employment positions used to determine the number of graduates employed in the field for purposes of calculating job placement rates.</p> <p>To remedy the violation, the institution shall provide a list of employment positions used to determine the number of graduates employed in the field for purposes of calculating job placement rates.</p> <p>The corrections to the PFS substantiating documentation shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CCR §74112. Uniform Data-Annual Report, Performance Fact Sheet</p>	<p>(d) 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 program as defined in subdivision (b), the number of students available for graduation, number of graduates, and completion rate(s). An optional column may be added to include completion rate data for students completing within 101-150% 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. 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. Completion rates shall be included in the Performance Fact Sheet in a format substantially similar to the chart below, including the footnoted information below (dates, numbers, and other data shown are for example only).</p> <p>The institution's 2013/2014 Performance Fact Sheet (PFS) does not report completion rate percentages for programs which had zero students in the reporting year. The PFS does not contain 150% Completion Rate information with correct data. The data is a replica of on time</p>

	<p>completion rates.</p> <p>To remedy the violation, the institution's PFS shall be updated to include completion rate percentages for each program offered in the reporting year. The institution's current 2013/2014 PFS shall be updated to include 150% completion data which is accurate.</p> <p>The PFS correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CCR §74112. Uniform Data-Annual Report, Performance Fact Sheet</p>	<p>(e) Placement Rates.</p> <p>(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 (b) for each reported calendar year.</p> <p>(2) Placement is measured six months from the graduation date of each student. 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 subdivision (b), graduates available for employment, graduates employed in the field and placement rate(s).</p> <p>(3) Placement rate shall be calculated as follows: the number of graduates employed in the field as defined in subsection 74112(b)(3) divided by the number of graduates available for employment as defined in section 94928(d) of the Code.</p> <p>(4) Graduates employed in the field shall be reported for those graduates employed in the field in a single position that averages under 32 hours per week and those employed in the field in a single position that averages at least 32 hours per week.</p> <p>References to the Code are to the California Education Code where the California Private Postsecondary Education Act of 2009 is located.</p> <p>Placement rates shall be included in the Performance Fact Sheet in a format substantially similar to the chart below, including the footnoted information below (dates, numbers, and other data shown are for example only):</p> <p>The institution's 2013/2014 Performance Fact Sheet does not contain placement data that included the placement rate percentage for programs which had zero students in a reporting year.</p> <p>To remedy the violation, the institution's current 2013/2014 PFS shall be updated to include placement rate percentage for each educational program.</p> <p>The PFS correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CCR §74112. Uniform Data-</p>	<p>(g) Salary and Wage Information.</p>

<p>Annual Report, Performance Fact Sheet</p>	<p>All Salary and Wage Information shall be reported to the Bureau pursuant to section 94929.5(c) of the Code and, if required by section 94910(d) of the Code, shall be included in the Performance Fact Sheet, for each educational program, in a format substantially similar to the chart below, including the footnoted information (dates, numbers, salaries, and other data shown are for example only).</p> <p>The PFS did not contain salary and wage data for programs which had zero students in a reporting year. The incremental salary data was omitted for those years.</p> <p>To remedy the violation, the institution shall update the current 2013/2014 PFS with the salary and wage data for each educational program offered in the reporting year.</p> <p>The PFS correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94910. Minimum Requirements for School Performance Fact Sheet.</p>	<p>(f) All of the following: (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).</p> <p>The PFS did not contain 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.</p> <p>To remedy the violation, the institution shall update the current 2013/2014 PFS to contain 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.</p> <p>The PFS correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94910. Minimum Requirements for School Performance Fact Sheet.</p>	<p>(f) All of the following: (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).</p> <p>The PFS did not contain a statement informing the reader of where he or she may obtain from the institution a list of the objective sources of information the institution used to substantiate the salary disclosure.</p> <p>To remedy the violation, the institution shall update the current 2013/2014 PFS to contain a statement informing the reader of where he or she may obtain from the institution a list of the objective sources of information the institution used to substantiate the salary disclosure.</p> <p>The PFS correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94910. Minimum Requirements for School Performance Fact Sheet.</p>	<p>(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."</p> <p>The PFS did not contain the specific required statement informing prospective students that the</p>

Notice to Comply – CA 3406781 0516

Inspector's Initial: *MMW*

Administrator's Initial: *XV*

	<p>PFS is filed with the Bureau.</p> <p>To remedy the violation, the institution shall update the current 2013/2014 PFS to contain the specific required statement verbatim to the quoted statement above.</p> <p>The PFS correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94910. Minimum Requirements for School Performance Fact Sheet.</p>	<p>(g) The following statements: (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 Private Postsecondary Education at (address), Sacramento, CA (ZIP Code), (Internet Web site address), (telephone and fax numbers)."</p> <p>The PFS did not contain the specific required statement informing prospective students with questions to the Bureau.</p> <p>To remedy the violation, the institution shall update the current 2013/2014 PFS to contain the specific required statement verbatim to the quoted statement above.</p> <p>The PFS correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94902. General Enrollment Requirements.</p>	<p>(b) An enrollment agreement is not enforceable unless all of the following requirements are met: (3) Prior to the execution of the enrollment agreement, the student and the institution have signed and dated the information required to be disclosed in the Student Performance Fact Sheet pursuant to subdivisions (a) to (d), inclusive, of Section 94910. Each of these items in the Student Performance Fact Sheet shall include a line for the student to initial and shall be initialed and dated by the student.</p> <p>The institution provided a PFS which does not contain a line for the student to initial and date for their completion rate, placement rate, and salary and wage data information. There is no evidence the student and the institution sign and date the PFS prior to the execution of the enrollment agreement.</p> <p>To remedy the violation, the institution shall update the current 2013/2014 PFS to contain a line for students to initial and date following the completion, placement, and salary and wage data information.</p> <p>The PFS correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94912. Signature, Initials Required.</p>	<p>Prior to the execution of an enrollment agreement, the information required to be disclosed pursuant to subdivisions (a) to (d), inclusive, of Section 94910 shall be signed and dated by the institution and the student. Each of these items shall also be initialed and dated by the student.</p> <p>The institution provided a PFS which does not contain a line for the student to initial and date for their completion rate, placement rate, and salary and wage data information. There is no evidence the student and the institution sign and date the PFS prior to the execution of the enrollment agreement.</p> <p>To remedy the violation, the institution shall update the current 2013/2014 PFS to contain a line for students to initial and date following the completion, placement, and salary and wage data</p>

Notice to Comply – CA 3406781 0516

Inspector's Initial: *MW*

Administrator's Initial: *VD*

information.

The PFS correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.

STUDENT RECORDS

Education Code or Code of Regulations	Subsection, Description, and Required Correction
CCR §71930. Maintenance of Records.	<p>(d) The institution shall maintain a second set of all academic and financial records required by the Act and this chapter at a different location unless the original records, including records stored pursuant to subdivision (b) of this section, are maintained in a manner secure from damage or loss. An acceptable manner of storage under this subsection would include fire resistant cabinets.</p> <p>The institution does not actively maintain a second set of all academic and financial records at a separate location or maintain the records on site secure from damage or loss. Student files were kept in filing cabinets; partial records were backed up to an online network system.</p> <p>To correct the violation, the institution shall maintain a second set of all academic and financial records at a separate location or maintain the records on site secure from damage or loss. Backing up complete student files to the online network system may accomplish this.</p> <p>The PFS correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
CCR §71930. Maintenance of Records.	<p>(e) All records that the institution is required to maintain by the Act or this chapter shall be made immediately available by the institution for inspection and copying during normal business hours by the Bureau and any entity authorized to conduct investigations.</p> <p>The institution was unable to make student and institutional records immediately available upon request. The student file for [REDACTED] was not made available for Bureau inspection. Student records did not contain all required documents, such as signed School Performance Fact Sheets, institutional transcripts, and documents evidencing high school completion or its equivalent.</p> <p>To remedy this violation, all documentation required pursuant to this Chapter and the Ed. Code shall be maintained in the student's file or as an institutional record.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
CCR §71920.	(b) In addition to the requirements of section 94900, the file shall contain all of the

Notice to Comply – CA 3406781 0516

Inspector's Initial: *MW*

Administrator's Initial: *49*

<p>Student Records.</p>	<p>following pertinent student records:</p> <p>(1) Written records and transcripts of any formal education or training, testing, or experience that are relevant to the student's qualifications for admission to the institution or the institution's award of credit or acceptance of transfer credits including the following:</p> <p>(A) Verification of high school completion or equivalency or other documentation establishing the student's ability to do college level work, such as successful completion of an ability-to-benefit test</p> <p>The institution did not maintain a student record for [REDACTED] documenting the verification the student established his ability to do college level work. The student's file contained a sworn statement attesting to his high school completion, but not document of formal transcripts, high school diplomas or its equivalent was included in the file. In addition, the high school transcript for [REDACTED] did not show record the student was a high school graduate.</p> <p>To remedy this violation, the institution shall update student files to contain verification of high school completion or equivalency or other documentation establishing the student's ability to do collect level work, which may include: a copy of a recognized high school diploma, GED certificate, or results from an ability-to-benefit examination.</p> <p>The institution shall submit with their response copies of one current student file, one graduate student file, and one withdrawn student file with all required documents maintained in the students' files.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CCR §71920. Student Records.</p>	<p>(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:</p> <p>(3) Copies of all documents signed by the student, including contracts, instruments of indebtedness, and documents relating to financial aid</p> <p>Student records maintained by the institution did not contain a signed Performance Fact Sheet pursuant to CEC §94902(b)(3) and §94912.</p> <p>CEC §94902(b)(3) states, "Prior to the execution of the enrollment agreement, the student and the institution have signed and dated the information required to be disclosed in the Student Performance Fact Sheet pursuant to subdivisions (a) to (d), inclusive, of Section 94910. Each of these items in the Student Performance Fact Sheet shall include a line for the student to initial and shall be initialed and dated by the student."</p> <p>CEC §94912 states, "Prior to the execution of an enrollment agreement, the information</p>

	<p>required to be disclosed pursuant to subdivisions (a) to (d), inclusive, of Section 94910 shall be signed and dated by the institution and the student. Each of these items shall also be initialed and dated by the student.”</p> <p>To remedy this violation, all documentation required pursuant to this Chapter and the Ed. Code shall be maintained in the student’s file or as an institutional record. School Performance Fact Sheets shall be signed, initialed, and dated prior to enrollment, and maintained in the student’s academic file.</p> <p>Documentation of compliance shall be submitted with the institution’s response to the NTC and the last page of this document within the specified time frame.</p>
<p>CCR §71920. Student Records.</p>	<p>(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:</p> <p>(4) Records of the dates of enrollment and, if applicable, withdrawal from the institution, leaves of absence, and graduation;</p> <p>The institution does not maintain student files which contain records of dates of enrollment, students’ withdrawal from the institution, and graduation dates. Student files did not contain any formal transcripts which may contain the required information.</p> <p>To remedy this violation, the institution shall maintain records of dates of enrollment, students’ withdrawal from the institution, and graduation dates in each student file. This information may be included on the formal transcripts.</p> <p>Documentation of compliance shall be submitted with the institution’s response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94900. Required Student Records.</p>	<p>(b) An institution shall maintain, for each student granted a degree or certificate by that institution, permanent records of all of the following:</p> <p>(1) The degree or certificate granted and the date on which that degree or certificate was granted.</p> <p>Graduate files did not contain permanent records (transcripts) which contained the certificate and the date on which that certificate was granted.</p> <p>To remedy this violation, the institution shall document and maintain transcripts for each graduate showing the certificate and the date on which that certificate was granted.</p> <p>Documentation of compliance shall be submitted with the institution’s response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94900. Required Student Records.</p>	<p>(b) An institution shall maintain, for each student granted a degree or certificate by that institution, permanent records of all of the following:</p> <p>(2) The courses and units on which the certificate or degree was based.</p>

Notice to Comply – CA 3406781 0516

Inspector’s Initial: *MW*

Administrator’s Initial: *KD*

	<p>Graduate files did not contain permanent records (transcripts) which contained the courses and units on which the certificate was based.</p> <p>To remedy this violation, the institution shall document and maintain transcripts for each graduate showing the courses and units on which that certificate was granted.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94900. Required Student Records.</p>	<p>(b) An institution shall maintain, for each student granted a degree or certificate by that institution, permanent records of all of the following:</p> <p>(3) The grades earned by the student in each of those courses.</p> <p>Graduate files did not contain permanent records (transcripts) which contained the grades earned by the student in each course attempted.</p> <p>To remedy this violation, the institution shall document and maintain transcripts for each graduate showing the grades for each course attempted.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CCR §71920. Student Records.</p>	<p>(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:</p> <p>(5) In addition to the requirements of section 94900(b) of the Code, a transcript showing all of the following:</p> <p>(A) The courses or other educational programs that were completed, or were attempted but not completed, and the dates of completion or withdrawal.</p> <p>Student files did not contain transcripts showing the course or other educational programs that were completed, or were attempted but not completed, and the dates of completion or withdrawal.</p> <p>To remedy this violation, the institution shall document and maintain transcripts showing the course or other educational programs that were completed, or were attempted but not completed, and the dates of completion or withdrawal institution.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CCR §71920. Student Records.</p>	<p>(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:</p> <p>(5) In addition to the requirements of section 94900(b) of the Code, a transcript showing all of the following:</p> <p>(E) The name, address, website address, and telephone number of the institution.</p>

Notice to Comply – CA 3406781 0516

Inspector's Initial: *MM*

Administrator's Initial: *KD*

	<p>Student files did not contain transcripts showing the name, address, website address, and telephone number of the institution.</p> <p>To remedy this violation, the institution shall document and maintain transcripts showing the name, address, website address, and telephone number of the institution.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94902. General Enrollment Requirements.</p>	<p>(b) An enrollment agreement is not enforceable unless all of the following requirements are met:</p> <p>(1) The student has received the institution's catalog and School Performance Fact Sheet prior to signing the enrollment agreement.</p> <p>There is no indication students received a School Performance Fact Sheet prior to signing an enrollment agreement. Student files did not contain a School Performance Fact Sheet.</p> <p>To remedy this violation, the institution shall review the School Performance Fact Sheet and have students signed the document prior to signing the enrollment agreement. The institution shall submit copies of signed School Performance Fact Sheets of students enrolling in the next 30 days.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94902. General Enrollment Requirements.</p>	<p>(3) Prior to the execution of the enrollment agreement, the student and the institution have signed and dated the information required to be disclosed in the Student Performance Fact Sheet pursuant to subdivisions (a) to (d), inclusive, of Section 94910. Each of these items in the Student Performance Fact Sheet shall include a line for the student to initial and shall be initialed and dated by the student.</p> <p>In reviewing student files, there was no evidence the student and the institution signed and dated the information required to be disclosed in the School Performance Fact Sheet reporting the completion rates, job placement rates, and salary and wage data. In addition, this information was not initialed and dated by the student.</p> <p>To remedy this violation, the institution shall review the School Performance Fact Sheet and have students signed the document prior to signing the enrollment agreement. The</p>

Notice to Comply – CA 3406781 0516

Inspector's Initial: *MW*

Administrator's Initial: *KD*

	<p>institution shall submit copies of signed School Performance Fact Sheets of students enrolling in the next 30 days.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CCR §71920. Student Records.</p>	<p>(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:</p> <p>(8) A copy of documents relating to student financial aid that are required to be maintained by law or by a loan guarantee agency;</p> <p>Current student files did not contain copies of documents relating to student financial aid; the award letter for each student was not included in the current student file.</p> <p>To remedy this violation, the institution shall include all documents relating to student financial aid in each student file.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CCR §71920. Student Records.</p>	<p>(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:</p> <p>(9) A document showing the total amount of money received from or on behalf of the student and the date or dates on which the money was received;</p> <p>Current student files did not contain copies of documents showing the total amount of money received from or on behalf of the student and the date or dates on which the money was received.</p> <p>To remedy this violation, the institution shall include copies of documents showing the total amount of money received from or on behalf of the student and the date or dates on which the money was received.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
<p>CEC §94897. Prohibited Business Practices.</p>	<p>An institution shall not do any of the following:</p> <p>(l) Use the terms "approval," "approved," "approval to operate," or "approved to operate" without stating clearly and conspicuously that approval to operate means compliance with state standards as set forth in this chapter. If the bureau has granted an institution approval to operate, the institution may indicate that the institution is "licensed" or "licensed to operate," but may not state or imply either of the following:</p> <p>(1) The institution or its educational programs are endorsed or recommended by the state or by the bureau.</p> <p>The institution's certificates of completion included the Bureau's logo. This made imply the</p>

Notice to Comply – CA 3406781 0516

Inspector's Initial: MW

Administrator's Initial: KO

	<p>institution or its educational programs are endorsed or recommended by the Bureau.</p> <p>To remedy this violation, the institution shall remove the Bureau's logo from their certificates of completion.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
--	---

INSTITUTIONAL RECORDS

Education Code or Code of Regulations	Subsection, Description, and Required Correction
CCR §71720. Faculty	<p>(b) Instructors in an Educational Program Not Leading to a Degree.</p> <p>(1) An institution shall employ instructors who possess the academic, experiential and professional qualifications to teach, including a minimum of three years of experience, education and training in current practices of the subject area they are teaching. If an instructor does not possess the required three years of experience, education and training in the subject area they are teaching, the institution shall document the qualifications the instructor possesses that are equivalent to the minimum qualifications.</p> <p>The institution did not maintain documentation showing instructor ██████████ possessed the qualifications to teach the educational program. ██████████ faculty file contained a résumé which did not document his years of experience, and did not provide documentation to substantiate his educational qualifications stated in his résumé.</p> <p>To correct the violation, the institution shall update the faculty files to document the required three years of experience or the educational qualifications for each faculty member.</p> <p>The PFS correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.</p>
CEC §94900.5. Required Institutional Records.	<p>An institution shall maintain, for a period of not less than five years, at its principal place of business in this state, complete and accurate records of all of the following information:</p> <p>(b) The names and addresses of the members of the institution's faculty and records of the educational qualifications of each member of the faculty.</p> <p>The institution did not maintain records of the educational qualifications of each member of the faculty. Faculty files did not contain documentation to support the statements in each résumé provided for each faculty member for which their experience was not documented.</p> <p>To correct the violation, the institution shall update the faculty files to contain the</p>

Notice to Comply – CA 3406781 0516

Inspector's Initial: *MM*

Administrator's Initial: *VD*

educational qualifications of each member of the faculty.

The PFS correction shall be submitted with the institution's response to the NTC and the last page of this document within the specified time frame.

Notice to Comply – CA 3906781 0516

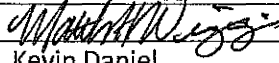
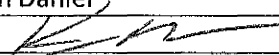
Inspector's Initial: *MM*

Administrator's Initial: *EO*

Only minor violations are listed on this Notice to Comply.

Additional material violations have been found? Y / N (Circle one)

If yes, material violations will be forwarded to Enforcement for further review. A Bureau representative will contact the institution with additional guidance.

Inspector's Name	Matthew Wiggins
Inspector's Signature	
Institution Administrator Name/Title:	Kevin Daniel
Institution Administrator's Signature:	

Education Code can be located at: http://www.bppe.ca.gov/lawsregs/ppe_act.shtml

Code of Regulations can be located at: <http://www.bppe.ca.gov/lawsregs/regs.shtml>

Notice to Comply – CA 3406781 0516

Inspector's Initial: MW

Administrator's Initial: KD

RETURN THIS FORM WITHIN THE SPECIFIED TIME FRAME WITH EITHER: 1) VERIFICATION OF COMPLIANCE OR 2) A NOTICE OF DISAGREEMENT

IMPORTANT COMPLIANCE NOTICE

California Education Code §94935 and California Code of Regulations §75010 provide that the Bureau for Private Postsecondary Education (Bureau) shall issue a Notice to Comply for minor violations detected during a compliance inspection by the Bureau.

By no later than 30 days from the date of the inspection, you must either: 1) Remedy the noncompliance item(s), sign the below declaration and submit this form to the Bureau, along with documentation describing how compliance was achieved; or 2) File with the Bureau a written notice of disagreement, specifying the minor violation(s) described in the Notice to Comply with which you disagree, and appealing it by requesting an informal office conference. If a written notice of disagreement is not timely filed with the Bureau, the right to appeal is deemed to have been waived.

Failure to timely remedy the noncompliance item(s) or file a written request for an informal office conference may result in the Bureau taking administrative enforcement action.

DECLARATION

Attached to this document is a list describing how compliance was achieved for each violation and supporting documentation. I declare under penalty of perjury that all violations identified in this Notice to Comply are corrected as described in the attachment.

Signature Date

Print Name and Title

THIS DECLARATION OR A NOTICE OF DISAGREEMENT MUST BE SUBMITTED TO THE BUREAU BY June 17, 2016.

Notice to Comply – CA-3406781 0516

Inspector's Initial: *MW*

Administrator's Initial: *KD*