

BUREAU FOR PRIVATE POSTSECONDARY EDUCATION

Sunset Review Report 2015

Presented to the Senate Committee on Business, Professions, and Economic Development

VOLUME 1



Bureau for Private Postsecondary Education

BACKGROUND INFORMATION AND OVERVIEW OF THE CURRENT REGULATORY PROGRAM

As of December 1, 2015

Section 1 –

Background and Description of the Bureau and Regulated Profession

Provide a short explanation of the history and function of the Bureau. Describe the occupations/profession that are licensed and/or regulated by the Bureau (Practice Acts vs. Title Acts).

Beginning January 1, 1998, regulation of private postsecondary educational institutions was carried out by the Bureau for Private Postsecondary and Vocational Education (BPPVE), within the Department of Consumer Affairs. On June 30, 2007, following criticisms of inadequate student protection and overly burdensome regulations, the Legislature and the Governor allowed the BPPVE to sunset. Between July 1, 2007, and December 31, 2009, private postsecondary educational institutions were unregulated.

Effective January 1, 2010, Assembly Bill 48 (Portantino, Chapter 310, Statutes of 2009) established the California Private Postsecondary Education Act (Act) and created the Bureau for Private Postsecondary Education (Bureau or BPPE) within the Department of Consumer Affairs (Department or DCA) to provide oversight of private postsecondary educational institutions operating in California. Specifically, the Act directs the Bureau to:

- ❖ Create a structure that provides an appropriate level of oversight, including approval of private postsecondary educational institutions and programs;
- ❖ Establish minimum operating standards for California private postsecondary educational institutions to ensure quality education for students;
- ❖ Provide students a meaningful opportunity to have their complaints resolved;
- ❖ Ensure that private postsecondary educational institutions offer accurate information to prospective students on school and student performance, thereby promoting competition between institutions that rewards educational quality and employment success;
- ❖ Ensure that all stakeholders have a voice and are heard in the operations of and rulemaking process by the Bureau; and,
- ❖ Proactively combat unlicensed institutions.

However, the Bureau was reestablished at a particularly difficult time because of the financial downturn and the subsequent State budget issues. While the Act went into effect on January 1, 2010, the Budget Act for 2010-11 was not enacted until October 8, 2010. This delay in appropriation for

staffing and funding the Bureau was further exacerbated by a hiring freeze. As applications for licenses and complaints were submitted to the Bureau, there was only a skeleton staff to handle them. Staffing issues are discussed further in Section 3- "Fiscal and Staff."

Today the Bureau's mission is to promote and protect the interests of students and consumers: 1) through the effective and efficient oversight of California's private postsecondary educational institutions, 2) through the promotion of competition that rewards educational quality and employment outcomes, 3) through proactively combating unlicensed activity, and 4) by resolving student complaints in a manner that benefits both the complaining student and future students.

The Bureau oversees and has statutory authority over private postsecondary educational institutions operating with a physical presence in California except for those specifically exempted by the Act. Nevertheless, exempt institutions may seek Bureau approval. If they seek approval and are approved by the Bureau, they are then subject to the Bureau's authority as any other non-exempt institution. The Bureau exercises its oversight authority through its various divisions. The Licensing Unit determines if an applicant has the capacity to meet the minimum operating standards. The Compliance Unit works to ensure that institutions maintain the required minimum operating standards. The Complaint investigations Unit works to resolve individual complaints against schools. Further student protections are found in the Student Tuition Recovery Fund (STRF), which serves to relieve or mitigate economic loss suffered by a student for various reasons, such as institutional or programmatic closure.

1. Describe the make-up and functions of each of the Bureau's committees (cf., Section 12, Attachment B).

California Education Code Section 94880 establishes the Bureau's Advisory Committee. It was amended in 2014 and now has 14 members, to be appointed as follows:

- Three members, who shall have a demonstrated record of advocacy on behalf of consumers, of which the Director of the Department of Consumer Affairs, the Senate Committee on Rules, and the Speaker of the Assembly shall each appoint one member.
- Two members, who shall be current or past students of institutions, appointed by the director.
- Three members, who shall be representatives of institutions, appointed by the director.
- Two members, which shall be employers that hire students, appointed by the director.
- One public member appointed by the Senate Committee on Rules.
- One public member appointed by the Speaker of the Assembly.
- Two nonvoting, ex officio members, one appointed by the chair of the policy committee of the Assembly with jurisdiction over legislation relating to the Bureau or designee appointed by the Speaker of the Assembly, and one appointed by the chair of the policy committee of the Senate with jurisdiction over legislation relating to the bureau or designee appointed by the Senate Committee on Rules.

The advisory Committee is tasked with advising the Bureau on matters relating to the Private Postsecondary Education Act and its administration, including reviewing the fee schedule, licensing, and enforcement provisions of the Act.

The Bureau is also tasked with seeking input from the Advisory Committee regarding the development of regulations for implementing the Act.

Table 1a. Attendance			
Shawn Crawford, Institutional Representative, Chair			
Date Appointed: February 10, 2010			
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	December 13, 2013	Sacramento	Y
Advisory Committee Meeting	August 12, 2014	Sacramento	Y
Advisory Committee Meeting	November 12, 2014	Sacramento	Y
Advisory Committee Meeting	February 18, 2015	Sacramento	Y
Advisory Committee Meeting	May 12, 2015	Sacramento	Y
Advisory Committee Meeting	August 19, 2015	Sacramento	Y
Advisory Committee Meeting	November 10, 2015	Sacramento	Y

Margaret Reiter, Consumer Advocate, Vice Chair			
Date Appointed: March 10, 2010			
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	December 13, 2013	Sacramento	Y
Advisory Committee Meeting	August 12, 2014	Sacramento	Y
Advisory Committee Meeting	November 12, 2014	Sacramento	Y
Advisory Committee Meeting	February 18, 2015	Sacramento	Y
Advisory Committee Meeting	May 12, 2015	Sacramento	Y
Advisory Committee Meeting	August 19, 2015	Sacramento	Y
Advisory Committee Meeting	November 10, 2015	Sacramento	Y

Diana Amaya, Public Member			
Date Appointed: February 4, 2015			
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	February 18, 2015	Sacramento	Y
Advisory Committee Meeting	May 12, 2015	Sacramento	N
Advisory Committee Meeting	August 19, 2015	Sacramento	Y
Advisory Committee Meeting	November 10, 2015	Sacramento	Y

Tamika Butler, Public Member			
Date Appointed: February 26, 2013			
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	December 13, 2013	Sacramento	Y

Advisory Committee Meeting	August 12, 2014	Sacramento	Y
Advisory Committee Meeting	November 12, 2014	Sacramento	Y
Advisory Committee Meeting	February 18, 2015	Sacramento	Y
Advisory Committee Meeting	May 12, 2015	Sacramento	N
Advisory Committee Meeting	August 19, 2015	Sacramento	Y
Advisory Committee Meeting	November 10, 2015	Sacramento	Y

Mitchell Fuerst, Institutional Representative			
Date Appointed: January 26, 2010			
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	December 13, 2013	Sacramento	Y
Advisory Committee Meeting	August 12, 2014	Sacramento	N
Advisory Committee Meeting	November 12, 2014	Sacramento	Y
Advisory Committee Meeting	February 18, 2015	Sacramento	N
Advisory Committee Meeting	May 12, 2015	Sacramento	N
Advisory Committee Meeting	August 19, 2015	Sacramento	Y
Advisory Committee Meeting	November 10, 2015	Sacramento	N

Sylton Hurdle, Employer Member			
Date Appointed: February 18, 2015			
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	May 12, 2015	Sacramento	Y
Advisory Committee Meeting	August 19, 2015	Sacramento	Y
Advisory Committee Meeting	November 10, 2015	Sacramento	Y

Katherine Lee-Carey, Institutional Representative			
Date Appointed: January 25, 2010			
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	December 13, 2013	Sacramento	Y
Advisory Committee Meeting	August 12, 2014	Sacramento	Y
Advisory Committee Meeting	November 12, 2014	Sacramento	Y
Advisory Committee Meeting	February 18, 2015	Sacramento	Y
Advisory Committee Meeting	May 12, 2015	Sacramento	N
Advisory Committee Meeting	August 19, 2015	Sacramento	Y
Advisory Committee Meeting	November 10, 2015	Sacramento	Y

Ken McElDowney, Consumer Advocate			
Date Appointed: January 25, 2010			
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	December 13, 2013	Sacramento	N
Advisory Committee Meeting	August 12, 2014	Sacramento	Y
Advisory Committee Meeting	November 12, 2014	Sacramento	Y

Advisory Committee Meeting	February 18, 2015	Sacramento	Y
Advisory Committee Meeting	May 12, 2015	Sacramento	Y
Advisory Committee Meeting	August 19, 2015	Sacramento	N
Advisory Committee Meeting	November, 10, 2015	Sacramento	Y

Assemblymember Jose Medina, Non-Voting, Ex Officio Member, Chair of the Assembly Committee on Higher Education			
Date Appointed: February 4, 2015			
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	February 18, 2015	Sacramento	Y
Advisory Committee Meeting	May 12, 2015	Sacramento	Y (Designee: Laura Metune)
Advisory Committee Meeting	August 19, 2015	Sacramento	Y (Designee: Laura Metune)
Advisory Committee Meeting	November 10, 2015	Sacramento	Y (Designee: Laura Metune)

Maria Roberts De La Parra, Past Student of Institutions			
Date Appointed: January 25, 2010			
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	December 13, 2013	Sacramento	N
Advisory Committee Meeting	August 12, 2014	Sacramento	N
Advisory Committee Meeting	November 12, 2014	Sacramento	Y
Advisory Committee Meeting	February 18, 2015	Sacramento	Y
Advisory Committee Meeting	May 12, 2015	Sacramento	Y
Advisory Committee Meeting	August 19, 2015	Sacramento	Y
Advisory Committee Meeting	November 10, 2015	Sacramento	Y

Patrick Uetz, Consumer Advocate			
Date Appointed: February 23, 2013			
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	December 13, 2013	Sacramento	Y
Advisory Committee Meeting	August 12, 2014	Sacramento	Y
Advisory Committee Meeting	November 12, 2014	Sacramento	Y
Advisory Committee Meeting	February 18, 2015	Sacramento	Y
Advisory Committee Meeting	May 12, 2015	Sacramento	Y
Advisory Committee Meeting	August 19, 2015	Sacramento	Y
Advisory Committee Meeting	November 10, 2015	Sacramento	N

David Wood, Past Student of Institutions			
Date Appointed: February 18, 2015			
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	May 12, 2015	Sacramento	N
Advisory Committee Meeting	August 19, 2015	Sacramento	N
Advisory Committee Meeting	November 10, 2015	Sacramento	N

Senator Jerry Hill, Non-Voting, Ex Officio Member, Chair of the Senate Committee on Business, Professions and Economic Development			
Date Appointed:	June 17, 2015		
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	August 19, 2015	Sacramento	N
Advisory Committee Meeting	November 10, 2015	Sacramento	N

Maria R. Anguiano, Public Member – Removed (January 7, 2015)			
May 8, 2013			
Meeting Type	Meeting Date	Meeting Location	Attended?
Advisory Committee Meeting	December 13, 2013	Sacramento	N
Advisory Committee Meeting	August 12, 2014	Sacramento	N
Advisory Committee Meeting	November 12, 2014	Sacramento	N

Table 1b. Advisory Committee Member Roster					
Member Name (Include Vacancies)	Date First Appointed	Date Re-appointed	Date Term Expires	Appointing Authority	Type (public or professional)*
Shawn Crawford, Institutional Representative, Chair	February 10, 2010	N/A	N/A	DCA Director	Institutional Representative
Margaret Reiter, Consumer Advocate, Vice Chair	March 10, 2010	N/A	N/A	Senate Committee on Rules	Consumer Advocate
Diana Amaya, Public Member	February 4, 2015	N/A	N/A	Senate Committee on Rules	Public
Tamika Butler, Public Member	February 26, 2013	N/A	N/A	Speaker of the Assembly	Public
Mitchel Fuerst, Institutional Representative	January 26, 2010	N/A	N/A	DCA Director	Institutional Representative
Senator Jerry Hill Non-voting Member	June 17, 2015	N/A	N/A	Senate Committee on Rules	Ex Officio
Sylton Hurdle, Employer Member	February 18, 2015	N/A	N/A	DCA Director	Employer Member
Katherine Lee-Carey Institutional Representative	January 25, 2010	N/A	N/A	DCA Director	Institutional Representative
Ken McElDowney, Consumer Advocate	January 25, 2010	N/A	N/A	DCA Director	Consumer Advocate
Assemblymember Jose Medina Non-voting Member	February 4, 2015	N/A	N/A	Speaker of the Assembly	Ex Officio
Marie Roberts De La Parra Past Student of Institutions	January 25, 2010	N/A	N/A	DCA Director	Past Student
Patrick Uetz Consumer Advocate	February 26, 2013	N/A	N/A	Speaker of the Assembly	Consumer Advocate
David Wood Past Student of Institutions	February 18, 2015	N/A	N/A	DCA Director	Past Student
(Vacant) Employer Member	Vacant	N/A	N/A	DCA Director	Employer Member

*Statute requires the Advisory Committee members to be drawn from the postsecondary education community, and must include industry, student, and employer representation.

2. In the past four years, was the Bureau unable to hold any meetings due to lack of quorum? If so, please describe. Why? When? How did it impact operations?

The Bureau does not have a statutory requirement for a quorum expressed in the Act but the Advisory Committee is subject to the Bagley-Keene Open Meeting Act, therefore a quorum is a majority of its members. Because the Advisory Committee is advisory only, any lack of a quorum did not impact the Bureau's operations, and where there was less than a majority present, the Advisory Committee met as a subcommittee.

3. Describe any major changes to the Bureau since the last Sunset Review, including:

- **Internal changes (i.e., reorganization, relocation, change in leadership, strategic planning)**

While the staff size continues to grow, the general overall Bureau organization has not changed. The Bureau has not relocated, but has rearranged available space to accommodate the growing staff size. The Bureau's leadership has remained stable for the past two years. The Bureau is in the early stages of developing a new strategic plan.

- **All legislation sponsored by the Bureau and affecting the Bureau since the last sunset review.**

The Bureau does not sponsor legislation; however the following legislation has had an impact on the Bureau and its activities.

- AB 509 (Perea, Chapter 558, Statutes of 2015) exempts all bona fide organizations, associations, or councils that provide preapprenticeship programs on behalf of apprenticeship programs that are approved by the Division of Apprenticeship Standards from regulation by the Bureau of Private Postsecondary Education. In order to be exempt, programs must meet certain requirements.
- AB 721 (Medina, Chapter 632, Statutes of 2015) expands the data related to student loans that public, private or independent postsecondary educational institutions, except the community colleges, are required to disclose to the public, if requested. Additionally, this bill requires institutions to inform students about all unused state and federal financial assistance, such as unused federal student loan moneys that may be available to the student.
- AB 752 (Salas, Chapter 560, Statutes of 2015) requires the Bureau to review, by July 1, 2016, the examinations for ability-to-benefit students prescribed by the United States Department of Education. As part of this review, this bill requires the Bureau to determine whether the examinations are appropriate for ability-to-benefit students who possess limited English proficiency and approve an alternative examination if the Bureau decides the examinations are inappropriate.
- SB 81 (Committee on Budget and Fiscal Review, Chapter 22, Statutes of 2015) includes numerous statutory changes intended to implement the Budget Act of 2015 related to postsecondary education. Among those changes is a provision that allows the Bureau to enter into a contract with any independent institution of higher education, as defined, to review and act on student complaints against the institution.

- SB 410 (Beall, Chapter 258, Statutes of 2015) redefines “Graduates” as “On-time graduates” for the purpose of the School Performance Fact Sheet (Fact Sheet).
- AB 834 (Williams, Chapter 176, Statutes of 2014) created an alternate process for American Bar Association accredited law schools to complete the Bureau’s School Performance Fact Sheet.
- AB 2099 (Frazier, Chapter 676, Statutes of 2014) stipulates new Title 38 veterans funding eligibility standards for postsecondary institutions in California. All institutions must provide license examination passage rates to students, and institutions that offer degrees must have institutional and programmatic accreditation. In addition, all postsecondary institutions, whether degree-granting or not, must be one of the following in order to be Title 38 eligible: a public school, a not-for-profit school, have approval to operate from the Bureau, or be regionally accredited.
- SB 845 (Correa, Chapter 120, Statutes of 2014) requires the Board of Governors of the California Community Colleges and Trustees of the California State University, and requests the Regents of the University of California and governing bodies of accredited private postsecondary educational institutions, to develop model contracts to be used when negotiating with financial institutions to disburse student financial aid awards and refunds.
- SB 1247 (Lieu, Chapter 840, Statutes of 2014) amended the Act by doing the following: 1) requiring Bureau approval in order for for-profit schools to be Title 38 veterans funding eligible; 2) requiring accreditation for degree-granting institutions; 3) mandating a number of legislative reports; 4) making substantive changes to the makeup and function of the advisory committee; 5) changing statutory eligibility requirements for the Student Tuition Recovery Fund (Fund); 6) mandating one announced and one unannounced compliance inspection for institutions every five years instead of two years; 7) establishing statutory criteria for prioritizing complaint processing; 8) making numerous necessary technical and clarifying updates to the Act; and 9) setting the sunset date of the Bureau at January 1, 2017.
- **All regulation changes approved by the Bureau the last sunset review. Include the status of each regulatory change approved by the Bureau.**
 - In process: STRF Regulations: This package rewrites the STRF regulations to bring them in compliance with provisions of SB 1247. This package adds program closure and awards ordered by the Bureau, the court, or an arbiter as grounds for a claim. Additionally, it provides that third party payer benefits can be part of a STRF claim and includes a new system for refunds based on that benefit.
 - In process: Prioritization of Complaint Investigations and Compliance Inspections Regulations: This package puts in place a priority system for investigating complaints and scheduling compliance inspections which includes the factors added to statute by SB 1247.
 - In process: Annual Reports and Performance Fact Sheets regulations: This package made changes to the requirements for Annual Reports and Performance Fact Sheets. Among the changes are a single deadline for both reports, definition of

“gainful employment,” revising of other definition and terms to standardize the data, additions of various categories to be reported including those necessary for setting priorities for investigations and inspections. Most of the changes were required by SB 1247.

- In process: Accreditation of Degree Granting Institutions Regulations: This package will make permanent the regulations from the earlier emergency regulations. They provide that all degree granting programs must be accredited and incorporates deadlines for meeting the new requirement both for approved existing institutions and for new programs and institutions.
- In effect as of January 30, 2015: Emergency Regulations: Accreditation of degree granting institutions 2/1/2015. This package encompassed the emergency regulations required for raising the minimum operating standards for all degree-granting programs to be accredited. Currently this package is in effect as emergency regulations as of 2/1/2015.
- In effect as of January 1, 2015: STRF Assessment change 12/4/2014: This package changed the STRF assessment from \$0.50 per \$1000 to \$0 per \$1000, temporarily suspending the collection of STRF beginning 1/1/2015. This was necessary as the STRF fund had exceeded its statutory cap.

4. Describe any major studies conducted by the Bureau (cf. Section 12, Attachment C).

CPS HR Consulting conducted an independent review of Estimated Workload and Staffing Recommendations. CPS also looked at ways to make the existing processes more efficient where possible. Ultimately, this study resulted in three separate reports.

- **September 15, 2014**

This was an interim report to provide the Bureau with a preliminary analysis based on the work completed by CPS from May 2014 through August 2014.

- **February 13, 2015**

This was an interim report to provide the Bureau with quantifiable information related to the workload and staffing resources based on the “As Is” process configurations. This interim report provided the first glimpse of CPS staffing recommendations for improvement for the Licensing, Enforcement and Student Tuition Recovery Fund Units. This report was submitted by the Director of the Department of Consumer Affairs pursuant to Education Code section 94949 on March 15, 2015.

- **July 17, 2015**

This is the final CPS report based on their research and analysis of information they compiled from May 2014 through July 2015.

Copies of each of these reports are included as Attachment C

5. List the status of all national associations to which the Bureau belongs.

The Bureau belongs to the National Association of State Administrators and Supervisors of Private Schools (NASASPS)

- **Does the Bureau’s membership include voting privileges?**

Yes, the Bureau has voting privileges with its membership in NASASPS.

- **List committees, workshops, working groups, task forces, etc., on which Bureau participates.**

The Bureau Chief is a member of the Board of Directors for NASASPS.

- **How many meetings did Bureau representative(s) attend? When and where?**

The Bureau Chief attended the annual conference in Little Rock, AR in April 2014 and the annual NASASPS Board meeting and annual conference in Savannah, GA in April 2015.

- **If the Bureau is using a national exam, how is the Bureau involved in its development, scoring, analysis, and administration?**

The Bureau does not require an examination, national or otherwise, as it approves institutions, not individuals.

Section 2 – Performance Measures and Customer Satisfaction Surveys

6. Provide each quarterly and annual performance measure report for the Bureau as published on the DCA website.

Quarterly and annual reports of *Performance Measures* provide stakeholders with the Bureau’s progress in meeting its enforcement target goals. (See Section 12 Attachment E)

7. Provide results for each question in the Bureau’s customer satisfaction survey broken down by fiscal year. Discuss the results of the customer satisfaction surveys.

The Bureau includes a postage-paid customer satisfaction survey with every complaint closure letter. To date, the Bureau has not received any responses to the customer satisfaction survey.

Additionally, the Bureau conducts one additional survey with compliance inspections and is in the process of developing a second survey to be completed by institutions after the completion of a compliance inspection. The institutional survey will be done in order to determine the level of customer service provided by the Bureau, the responsiveness of the analyst, the time it takes to complete the compliance inspection and adhere to Bureau policies and procedures by Bureau staff.

The Bureau distributed 2,158 surveys to students during compliance inspections during FY 2013-14. The Bureau distributed 541 surveys to students during compliance inspections during FY 2014-15. Below are the questions and results of the student responses to the survey following a compliance inspection.

Q1) Before enrolling, were you given accurate information about the educational program?								
FY	Yes		No		N/A		No Response	
2013-14	2022	93.7%	35	1.6%	88	4.1%	13	0.6%
2014-15	458	84.7%	51	9.4%	0	0	32	5.9%

Q2) Did you receive a current catalog before enrolling?

FY	Yes		No		N/A		No Response	
2013-14	1655	76.7%	201	9.3%	24	1.1%	278	12.9%
2014-15	493	91.1%	36	6.7%	0	0	12	2.2%
Q3) Did you receive a School Performance Fact Sheet before signing the enrollment agreement?								
FY	Yes		No		N/A		No Response	
2013-14	1666	77.2%	101	4.7%	337	15.6%	54	2.5%
2014-15	477	88.2%	0	8.9%	0	0	16	3.0%
Q4) Did you receive a copy of your signed enrollment agreement?								
FY	Yes		No		N/A		No Response	
2013-14	1364	63.2%	771	35.7%	19	0.9%	4	0.2%
2014-15	489	90.3%	36	6.6%	12	2.2%	4	0.74%
Q5) Were you promised or guaranteed employment upon graduation?								
FY	Yes		No		N/A		No Response	
2013-14	806	37.3%	1241	57.5%	75	3.5%	36	1.7%
2014-15	447	82.6%	54	10.0%	8	1.48%	32	5.9%
Q6) Before enrolling, were all tuition, fees and charges disclosed?								
FY	Yes		No		N/A		No Response	
2013-14	1648	76.4%	309	14.3%	59	2.7%	142	6.6%
2014-15	473	87.4%	40	7.4%	12	2.2%	16	3.0%
Q7) If you received financial aid, were all terms including loan repayment explained?								
FY	Yes		No		N/A		No Response	
2013-14	1054	48.8%	108	5.0%	963	44.6%	33	1.5%
2014-15	433	80%	52	9.6%	40	7.4%	16	3.0%
Q8) Did you receive a syllabus or course outline for each course?								
FY	Yes		No		N/A		No Response	
2013-14	1788	82.9%	175	8.1%	49	2.3%	146	6.8%
2014-15	488	90.2%	28	5.2%	5	0.9%	20	3.7%
Q9) Are instructors knowledgeable in the subject they teach?								
FY	Yes		No		N/A		No Response	
2013-14	2046	94.8%	34	1.6%	11	0.5%	67	3.1%
2014-15	521	96.3%	12	2.2%	4	0.7%	4	0.7%
Q10) Do instructors present class information and materials clearly?								
FY	Yes		No		N/A		No Response	
2013-14	1968	91.2%	60	2.8%	11	0.5%	119	5.5%
2014-15	525	97%	21	3.9%	0	0	0	0
Q11) Do instructors clearly answer your questions?								
FY	Yes		No		N/A		No Response	
2013-14	2040	94.5%	50	2.3%	20	0.9%	48	2.2%
2014-15	521	96.3%	30	5.5%	5	0.9%	0	0
Q12) Do instructors clearly explain the grading system?								
FY	Yes		No		N/A		No Response	
2013-14	1739	80.6%	159	7.4%	132	6.1%	128	5.9%
2014-15	506	93.5%	33	6.0%	7	1.3%	0	0
Q13) Is classroom equipment in good working order?								
FY	Yes		No		N/A		No Response	
2013-14	2022	93.7%	71	3.3%	24	1.1%	41	1.9%
2014-15	504	93.2%	32	5.9%	0	0	5	0.9%

Q14) Does the school use current equipment?								
FY	Yes		No		N/A		No Response	
2013-14	2018	93.5%	69	3.2%	32	1.5%	39	1.8%
2014-15	485	89.6%	44	8.1%	8	1.5%	4	0.7%
Q15) Is there enough classroom equipment for the students?								
FY	Yes		No		N/A		No Response	
2013-14	2000	92.7%	108	5.0%	27	1.3%	23	1.1%
2014-15	481	88.9%	60	11.0%	0	0	0	0
Q16) Are library and other resources available to complete required assignments?								
FY	Yes		No		N/A		No Response	
2013-14	1742	80.7%	203	9.4%	194	9.0%	19	0.9%
2014-15	463	85.6%	32	5.9%	36	6.7%	10	1.8%
Q17) Are library and other resources available when needed?								
FY	Yes		No		N/A		No Response	
2013-14	1735	80.4%	194	9.0%	213	9.9%	16	0.7%
2014-15	441	81.5%	40	7.4%	58	10.7%	2	0.4%
Q18) Are you satisfied with your decision to attend this school?								
FY	Yes		No		N/A		No Response	
2013-14	2012	93.2%	43	2.0%	25	1.2%	78	3.6%
2014-15	513	94.8%	12	2.2%	15	2.8%	0	0
Q19) Would you recommend this school to others?								
FY	Yes		No		N/A		No Response	
2013-14	2085	96.6%	34	1.6%	19	0.9%	20	0.9%
2014-15	516	95.4%	0	0	25	4.6%	0	0

Section 3 – Fiscal and Staff

Fiscal Issues

8. Describe the Bureau's current reserve level, spending, and if a statutory reserve level exists.

From 2010 to 2012, the fund balance reserve exceeded its six-month statutory cap (CEC section 94930(b)). During this time the Bureau was unable to become fully staffed and reverted a significant amount of savings. This was caused by a hiring freeze that was in effect from February, 2011 until October, 2011, as well as difficulty in filling limited term positions. In 2013, legislation (SB 71 Committee on Budget and Fiscal Review, Chapter 28, Statutes of 2013) suspended the six-month statutory cap for a period of one year (in lieu of lowering or suspending fees). At the end of FY 2014/15, the fund had a reserve of 7.5 months. However, the fund reserve has been falling and the Bureau projects to have a fund reserve of 2.9 months at the end of FY 2015/16 as the Bureau increases expenditures and adds more required staff.

9. Describe if/when a deficit is projected to occur and if/when fee increase or reduction is anticipated. Describe the fee changes (increases or decreases) anticipated by the Bureau.

Bureau reserves are falling as the Bureau staff size increases to meet its current needs. Based on the current rate of expenditures and recent declining revenue, the Bureau's fund will become

insolvent in 2017-18. The Bureau is currently evaluating its declining revenue, which may be due in part from recent schools closures.

The current fee structure has been in place since 2010 and has not been adjusted since that time. Existing law authorizes the Bureau to adjust the fees if consistent with the intent of the Act. Given the likelihood of the fund balance experiencing fiscal pressure in the coming years, the Advisory Committee began analyzing the current fee structure at the August 2015 meeting. The Advisory Committee also discussed the fee structure at its November 2015 meeting. While the Advisory Committee has not made any formal recommendations to the Bureau at this time, several members have expressed willingness to restructure the fee schedule in order to make the revenue more equitable and reliable.

Table 2. Fund Condition						
(Dollars in Thousands)	FY 2011/12	FY 2012/13	FY 2013/14	FY 2014/15	FY 2015/16	FY 2016/17*
Beginning Balance	\$6,473	\$8,350	\$10,548	\$11,462	\$9,446	\$3,730
Revenues and Transfers	\$10,696	\$9,928	\$9,863	\$9,371	\$9,476*	\$9,632
Total Revenue	\$10,696	\$9,928	\$9,863	\$9,371	\$9,476*	\$9,632
Budget Authority	\$7,295	\$8,147	\$9,507	\$11,440	\$15,192	\$15,475
Expenditures	\$5,835	\$7,731	\$8,641	\$11,387	\$15,192*	\$15,475
Loans to General Fund	-\$3,000	\$0	\$0	\$0	\$0	\$0
Accrued Interest, Loans to General Fund	TBD	TBD	TBD	TBD	TBD	TBD
Loans Repaid From General Fund	\$0	\$0	\$0	\$0	\$0	3,000
Fund Balance	\$8,334	\$10,547	\$11,462	\$9,446	\$3,730	\$886
Months in Reserve	12.9	14.1	15.9	7.5	2.9	0.7

* Projected

10. Describe the history of general fund loans. When were the loans made? When have payments been made to the Bureau? Has interest been paid? What is the remaining balance?

A loan of \$3.0 million was made from the Bureau to the General Fund in FY 2011/12. The loan is still outstanding with no payments or interest paid thus far. The loan is projected to be repaid in FY 2016-17.

11. Describe the amounts and percentages of expenditures by program component. Use *Table 3. Expenditures by Program Component* to provide a breakdown of the expenditures by the Bureau in each program area. Expenditures by each component (except for pro rata) should be broken out by personnel expenditures and other expenditures.

For FY 2014/15, Enforcement, which includes both complaint investigations and compliance inspections, accounted for 44.0% of the Bureau's expenditures, Licensing, which also includes Quality of Education, was 22.5% of Bureau expenditures, Administration represented 13.7% of the Bureau's expenditures, and the DCA Pro Rata was 19.9% of the Bureau's expenditures.

Table 3. Expenditures by Program Component								(list dollars in thousands)	
	FY 2011/12		FY 2012/13		FY 2013/14		FY 2014/15		
	Personnel Services	OE&E							
Enforcement	\$2,094	\$286	\$2,471	\$825	\$2,081	\$905	\$3,370	\$1,676	
Examination	0	0	0	0	0	0	0	0	
Licensing	\$589	\$80	\$1,036	\$279	\$1,927	\$622	\$1,988	\$599	
Administration *	\$981	\$134	\$1,036	\$279	\$1,079	\$349	\$1,210	\$365	
DCA Pro Rata	0	\$1,498	0	\$1,753	0	\$1,683	0	\$2,171	
Diversion (if applicable)	0	0	0	0	0	0	0	0	
TOTALS	\$3,664	\$1,998	\$4,543	\$3,136	\$5,087	\$3,559	\$6,568	\$4,811	

*Administration includes costs for executive staff, bureau, administrative support, and fiscal services.

12. Describe license renewal cycles and history of fee changes in the last 10 years. Give the fee authority (Business and Professions Code and California Code of Regulations citation) for each fee charged by the Bureau.

Approvals are valid for five years if the applicant is applying for approval of an institution not accredited. Approvals that are based on an institutional accreditation are coterminous with the institution's accreditation.

The Bureau's fees have not changed since the fees were established in the Act. They are laid out as follows in statute:

Article 17 of the California Private Postsecondary Education Act of 2009 (California Education Code, Title 3, Division 10, Part 59, Chapter 8)

94930.

(a) All fees collected pursuant to this article, including any interest on those fees, shall be deposited in the Private Postsecondary Education Administration Fund, and shall be available, upon appropriation by the Legislature, for expenditure by the bureau for the administration of this chapter.

(b) If the bureau determines by regulation that the adjustment of the fees established by this article is consistent with the intent of this chapter, the bureau may adjust the fees. However, the bureau shall not maintain a reserve balance in the Private Postsecondary Education Administration Fund in an amount that is greater than the amount necessary to fund six months of authorized operating expenses of the bureau in any fiscal year.

94930.5.

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) An annual institutional fee, in an amount equal to three-quarters of 1 percent of the institution's annual revenues derived from students in California, but not exceeding a total of twenty-five thousand dollars (\$25,000) annually.

(B) An annual branch fee of one thousand dollars (\$1,000) for each branch or campus of the institution operating in California.

(2) The amount of the annual fees pursuant to paragraph (1) shall be proportional to the bureau's cost of regulating the institution under this chapter.

Table 4. Fee Schedule and Revenue

(list revenue dollars in thousands)

Fee	Current Fee Amount	Statutory Limit	FY 2011/12 Revenue	FY 2012/13 Revenue	FY 2013/14 Revenue	FY 2014/15 Revenue	% of Total Revenue
New Institution	\$5,000	\$5,000	\$468	\$428.5	\$379.3	\$320.3	3.4%
New Branch – Non Accredited	\$3,000	\$3,000	\$153	\$49	\$56.3	\$56	0.6%
New Branch – Accredited	\$750	\$750	\$75.3	\$61	\$70.6	\$57.8	0.6%
Verification of Exemption	\$250	\$250	\$40.3	\$45	\$52.8	\$41.8	0.4%
Change in Education Objective	\$500	\$500	\$42.5	\$44.8	\$25.3	\$25.3	0.3%
Minor Change	\$500	\$500	\$26.3	\$31	\$22	\$19.8	0.2%
Change in Location	\$500	\$500	\$18.8	\$19.8	\$10.8	\$16	0.2%
Change of Name	\$500	\$500	\$17.8	\$8	\$9.3	\$7.5	0.1%
Change in Approval – Accreditation	\$250	\$250	\$40	\$61	\$61.3	\$59.5	0.7%
Change in Method	\$500	\$500	\$7	\$10.3	\$8	\$9.3	0.1%
Renewal – Main Campus	\$3,500	\$3,500	\$752.8	\$544.5	\$231.6	\$57.2	0.6%
Renewal – Branch	\$3,000	\$3,000	\$24	\$15	\$42	\$0	0%
Renewal – Accredited	\$500	\$500	\$61.5	\$71.8	\$49.5	\$31.7	0.3%
Annual Institution Fee	up to \$25,000	up to \$25,000	\$8,531.1	\$7,972.4	\$8,115.8	\$7,897.5	84.2%
Annual Branch Fee	\$1,000	\$1,000	\$27.2	\$186	\$388	\$398	4.2%

13. Describe Budget Change Proposals (BCPs) submitted by the Bureau in the past four fiscal years.

Table 5. Budget Change Proposals (BCPs)								
BCP ID #	Fiscal Year	Description of Purpose of BCP	Personnel Services				OE&E	
			# Staff Requested (include classification)	# Staff Approved (include classification)	\$ Requested	\$ Approved	\$ Requested	\$ Approved
1111-01L	13-14	AB 2296 Position	1.0 (AGPA)	1.0 (AGPA)	\$81,000	\$81,000	\$0	\$0
1111-01 SFL	13-14	Staff Augmentation: Licensing	8.0, 3.0-YR LT(Ed. Spec. and 5.0 AGPA)	8.0, 3.0 -YR LT (3.0 Ed. Spec. and 5.0 AGPA)	\$725,000	\$725,000	\$128,000	\$128,000
1111-08	14-15	Staff Augmentation: Enforcement	11.0, 3-YR LT AGPA	11.0, 3-YR LT AGPA	\$986,000	\$986,000	\$306,000	\$306,000
1111-002	15-16	Staff Augmentation: Enforcement and Licensing	10.0 (6.0 AGPA, 1.0 SSA and 3.0 OT) + 17LT to permanent	10.0 (6.0 AGPA, 1.0 SSA and 3.0 OT) + 17LT to permanent	\$4.53 million	\$4.53 million	\$217,000	\$217,000
1111-012-BCP-BR—2015-GB	2015-16	Staff Augmentation to Implement SB 1247	1.0 SSA, (PFT), 6 AGPA (PFT), 1 AGPA (LT), 1Ed Spec (PFT), 4 Ed Spec (LT), I Info Sys Analyst (PFT), I Attorney (PFT)	1.0 SSA, (PFT), 6 AGPA (PFT), 1 AGPA (LT), 1Ed Spec (PFT), 4 Ed Spec (LT), I Info Sys Analyst (PFT), I Attorney (PFT)	\$1.4 million 15/16 and \$1.4 million 16/17 and \$944,000 ongoing	\$1.4 million 15/16 and \$1.4 million 16/17 and \$944,000 ongoing	\$482,000 15/16, \$285,000 16/17, and \$133,000 ongoing	\$482,000 15/16, \$285,000 16/17, and \$133,000 ongoing

Staffing Issues

14. Describe any Bureau staffing issues/challenges, i.e., vacancy rates, efforts to reclassify positions, staff turnover, recruitment and retention efforts, succession planning.

The Bureau has had staffing challenges since it was reestablished in 2010. There was no appropriation in AB 48, the legislation establishing the Bureau, the budget for FY 2010/11 was historically late, not being signed until October, 2010 and the administration imposed a hiring freeze and furloughs which resulted in hiring delays. This delay caused backlogs in most divisions of the Bureau, which has required additional staff. The Bureau requested additional staffing in fiscal years 2013/14 and 2014/15 and received limited term positions. The limited term positions were difficult to fill as applicants are generally looking for full time permanent positions. The Bureau experienced serial vacancies as individuals filling limited term positions would leave as soon as they found a permanent position.

As the result of the audit conducted by the Bureau of State Audits in 2013/14 that found the Bureau was not meeting its statutory mandate, the Bureau contracted with a consultant, CPS HR Consulting, to review the Bureau's work processes and ascertain the Bureau's staffing needs. The report from CPS made several recommendations, particularly in the area of staffing. As a result, a BCP was submitted for FY 2015/16 and ongoing with the intention of bringing the

Bureau's staffing to an appropriate level to be able to work through the existing backlogs and handle the ongoing workload.

15. Describe the Bureau's staff development efforts and how much is spent annually on staff development (cf., Section 12, Attachment D).

Each new employee is given a training plan created specifically for that employee and the position the employee occupies. The training plan is to be completed, as practicable, by the end of the employee's probation period.

The Bureau conducts "all staff" training at least one time per year. During the all staff training every unit is assigned topics to present to the whole Bureau. The effort is key to having staff in all units apply the statute and regulations consistently which can become difficult when there is turnover.

The various units within the Bureau also hold specific training for staff. As an example, the enforcement division has contracted with the Attorney General's office for staff training in areas such as complaint investigation and report writing. The Bureau also sends new enforcement staff to Council on Licensure, Enforcement, and Regulation (CLEAR) training and DCA's Enforcement Academy. Enforcement and Licensing have contracted training for testifying as a witness. Each unit is also responsible for ensuring any new information is passed along to staff or any updates to training modules are presented to staff.

Additionally, Bureau staff attends Strategic Organization, Leadership, and Individual Development (SOLID) training at DCA headquarters. This training ranges from general topics such as "Basic Project Management" or "Excel 2010" to specific focus areas such as "Legislative Process" or "Hiring and Onboarding New Employees." Bureau staff has attended over 200 classes per fiscal year the past two fiscal years.

The Bureau has spent approximately \$14,000 on outside staff training and development with the Attorney General and CLEAR.

Section 4 – Licensing Program

16. What are the Bureau's performance targets/expectations for its licensing¹ program? Is the Bureau meeting those expectations? If not, what is the Bureau doing to improve performance?

The target performance expectation is to have complete and compliant applications reviewed and approved within 30 days of receipt by the Bureau. However, the Bureau has a backlog of applications which has existed from the re-establishment of the Bureau because of staffing issues. Applications began being submitted in February of 2010; however, the FY 2010/11 budget wasn't passed until October 8, 2010. By the time staff was hired in November of 2010 a backlog of approximately 1,100 applications existed. As of October 31, 2015, there are approximately, 140 applications pending assignment that are considered "backlog"; these are applications that have been received but are not yet assigned to an analyst.

¹ The term "license" in this document includes a license certificate or registration.

In order to address the backlog, in late 2014, the Bureau began instituting significant internal changes in policy and process. Early changes have resulted in a noticeable decline in the total number of applications pending or under review, which has dropped from 1022 on June 30, 2014 to 576 as of October 31, 2015. In addition to the process changes, the Bureau, through the BCP process, has been granted authority to hire additional staff. With these two changes the Bureau currently estimates the backlog of licensing applications will be eliminated by July 1, 2018.

17. Describe any increase or decrease in the Bureau’s average time to process applications, administer exams and/or issue licenses. Have pending applications grown at a rate that exceeds completed applications? If so, what has been done by the Bureau to address them? What are the performance barriers and what improvement plans are in place? What has the Bureau done and what is the Bureau going to do to address any performance issues, i.e., process efficiencies, regulations, BCP, legislation?

Average time to process applications is decreasing due to new procedures and increasing staff knowledge. As is noted in the response to #16 above, the number of pending applications is decreasing.

A couple of processes have been implemented that have assisted the Bureau in reducing the number of applications in the backlog. The Bureau has begun offering workshops on “how to complete an application for approval to operate.” The workshops review all required information and inform applicants about the best ways to present information and the most common errors seen in applications causing the applications to be delayed or denied. With the introduction of the workshops, the Bureau implemented a policy to provide only one deficiency notice to license applicants. Prior to the workshops and the new application procedure the Bureau provided up to five deficiency letters in an attempt to get the application complete and compliant with the law.

Previously the Bureau struggled to maintain staff in the limited term positions in the Licensing Unit. Staff turnover is critical when you consider that, because of the complexity of the law, and the variety of ways an institution may choose to operate, training of new staff is lengthy. It takes six months in most cases to prepare an analyst to effectively review an application for approval to operate an institution that is not accredited. It is expected that as staffing stabilizes because of the conversion of limited term positions to permanent/full time positions that was granted through the BCP process, the licensing backlog will continue to decrease.

18. How many licenses or registrations does the Bureau issue each year? How many renewals does the Bureau issue each year?

The Bureau approves about 100 new institutions per year and approves about 120 renewals per year. Additionally; the Bureau approves about 400 Applications for Substantial Change and around 130 Verifications of Exemption per year.

Table 6. Total Number of Approved Institutions					
		FY 2011/12**	FY 2012/13	FY 2013/14**	FY 2014/15
Main Location	Active	N/A	954	N/A	930
	Active Referred to Specialist*	N/A	153	N/A	133
Branch Locations	Active	N/A	338	N/A	423
	Active Referred to Specialist*	N/A	2	N/A	11
Satellite Locations	Active	N/A	512	N/A	555

	Active Referred to Specialist*	N/A	1	N/A	3
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* "Active Referred to Specialist" could mean that an institution has been flagged because the renewal came in late, but before the six month cut off that would require a new school application or that there are outstanding enforcement issues with the institution.

** The Bureau utilizes a different database (S.A.I.L.) than the majority of DCA entities which use the Consumer Affairs System (CAS), as such the Bureau does not have a date associated with the "Active" and "Active Referred to Specialist" fields that would show the status of each year. Therefore, we can only show institution data as of this date.

Table 7. Application Status					
	FY 2011/12	FY 2012/13	FY 2013/14	FY 2014/15	FY 2015/16*
Approval to Operate a Non-Accredited Institution					
Received	106	93	77	61	12
Approved	70	39	35	32	18
Denied	6	12	14	28	9
Closed	7	14	24	24	17
Under Review	56	53	135	114	115
Pending Review	15	28	70	75	39
Approval to Operate an Accredited Institution					
Received	130	83	93	81	21
Approved	142	55	63	81	26
Denied	2	0	5	4	1
Closed	40	18	14	19	3
Under Review	5	41	55	27	19
Pending Review	0	0	2	0	0
Renewal of Approval to Operate a Non-Accredited Institution					
Received	203	144	66	19	3
Approved	28	23	40	57	17
Denied	2	11	15	14	11
Closed	3	6	17	14	6
Under Review	79	16	165	88	107
Pending Review	88	128	165	151	101
Renewal of Approval to Operate an Accredited Institution					
Received	98	134	100	64	16
Approved	36	95	77	70	21
Denied	0	2	1	1	2
Closed	32	26	13	10	1
Under Review	10	50	47	26	21
Pending Review	0	0	1	0	0
Application for Changes					
Received	519	519	407	479	132
Approved	462	414	364	544	144
Denied	10	18	16	27	14

Closed	36	57	66	73	24
Under Review	74	142	262	147	140
Pending Review	12	71	15	46	13
Verification of Exemption					
Received	161	173	210	172	65
Approved	150	72	128	121	42
Denied	66	40	58	99	31
Closed	34	11	9	13	2
Under Review	22	12	56	39	19
Pending Review	0	92	49	0	2

*Through October 31, 2015

19. How does the Bureau verify information provided by the applicant?

The Bureau requires the applicant to provide documentation for each section of the application. Additional documentation is requested from the applicant when necessary. An analysis of the documents is performed to verify compliance with the minimum operating standards. In addition to internet searches, analysts will conduct third party verification and/or meet with the applications when there are questions regarding the validity of the information contained in the application.

a. What process does the Bureau use to check prior criminal history information, prior disciplinary actions, or other unlawful acts of the applicant?

For all new applicants, the Bureau conducts a database review of all listed owners to determine prior ownerships and disciplinary actions. All applications are reviewed to ensure that the financial data was overseen by a Certified Public Account. Bureau staff conducts additional research into the background of owners via Lexis Nexis if necessary. Owners must also sign under penalty of perjury that they have no criminal record.

b. Does the Bureau fingerprint all applicants?

No, the Bureau does not fingerprint applicants. The Bureau approves applicants which can be either a natural person or a business organization, irrespective of its form, per California Education Code sections 94816 and 94855.

c. Have all current licensees been fingerprinted? If not, explain.

The Bureau approves applicants which can be either a natural person or a business organization, irrespective of its form, per California Education Code sections 94816 and 94855.

d. Is there a national databank relating to disciplinary actions? Does the Bureau check the national databank prior to issuing a license? Renewing a license?

There is no national databank relating to disciplinary actions for institutions. However, the Bureau conducts a Web search to determine if the institution is/was operating in any other state(s). If the institution is found to have operated, or is operating, in another state and there are questions about the validity of any information included with the application, the Bureau may contact the other state(s) to determine if any actions were taken.

e. Does the Bureau require primary source documentation?

Depending on the type of application and level of income of the applicant institution, the Bureau requires applicants to provide either reviewed financial statements or audited financial statements. Reviews and audits must be completed by a Certified Public Accountant. The financial statements must show that the institution can meet minimum operating standards.

20. Describe the Bureau’s legal requirement and process for out-of-state and out-of-country applicants to obtain licensure.

The Bureau only has jurisdiction over institutions with a physical presence in the State of California. For institutions which maybe headquartered outside of California, there is a requirement that they provide a California contact with their California location.

21. Describe the Bureau’s process, if any, for considering military education, training, and experience for purposes of licensing or credentialing requirements, including college credit equivalency.

There are no experience or education requirements for an institution to be approved. The Bureau approves applicants which can be either a natural person or a business organization, irrespective of its form, per California Education Code sections 94816 and 94855.

a. Does the Bureau identify or track applicants who are veterans? If not, when does the Bureau expect to be compliant with BPC § 114.5?

The Bureau has developed a form to comply with this statute.

b. How many applicants offered military education, training or experience towards meeting licensing or credentialing requirements, and how many applicants had such education, training or experience accepted by the Bureau?

There are no experience or education requirements for an institution to be approved.

c. What regulatory changes has the Bureau made to bring it into conformance with BPC § 35?

There are no experience or education requirements for an institution to be approved.

d. How many licensees has the Bureau waived fees or requirements for pursuant to BPC § 114.3, and what has the impact been on Bureau revenues?

The Bureau has not waived fees or requirements.

e. How many applications has the Bureau expedited pursuant to BPC § 115.5?

The Bureau has not expedited any applications.

22. Does the Bureau send No Longer Interested notifications to DOJ on a regular and ongoing basis? Is this done electronically? Is there a backlog? If so, describe the extent and efforts to address the backlog.

The Bureau does not fingerprint applicants; therefore “No Longer Interested Notifications” are not necessary.

Examinations:

Not Applicable to the Bureau, as there is no examination for institutions to become approved.

Table 8. Examination Data				
California Examination (include multiple language) if any:				
License Type		N/A	N/A	N/A
Exam Title		N/A	N/A	N/A
FY 2011/12	# of 1 st Time Candidates	N/A	N/A	N/A
	Pass %	N/A	N/A	N/A
	# of 1 st Time Candidates	N/A	N/A	N/A
	Pass %	N/A	N/A	N/A
FY 2013/14	# of 1 st Time Candidates	N/A	N/A	N/A
	Pass %	N/A	N/A	N/A
FY 2014/15	# of 1 st time Candidates	N/A	N/A	N/A
	Pass %	N/A	N/A	N/A
Date of Last OA		N/A	N/A	N/A
Name of OA Developer		N/A	N/A	N/A
Target OA Date		N/A	N/A	N/A
National Examination (include multiple language) if any:				
License Type		N/A	N/A	N/A
Exam Title		N/A	N/A	N/A
FY 2011/12	# of 1 st Time Candidates	N/A	N/A	N/A
	Pass %	N/A	N/A	N/A
FY 2012/13	# of 1 st Time Candidates	N/A	N/A	N/A
	Pass %	N/A	N/A	N/A
FY 2013/14	# of 1 st Time Candidates	N/A	N/A	N/A
	Pass %	N/A	N/A	N/A
FY 2014/15	# of 1 st time Candidates	N/A	N/A	N/A
	Pass %	N/A	N/A	N/A
Date of Last OA		N/A	N/A	N/A
Name of OA Developer		N/A	N/A	N/A
Target OA Date		N/A	N/A	N/A

23. Describe the examinations required for licensure. Is a national examination used? Is a California specific examination required?

There is no examination for licensure of an institution.

24. What are pass rates for first time vs. retakes in the past 4 fiscal years? (Refer to Table 8: Examination Data)

There is no examination for licensure of an institution.

25. Is the Bureau using computer based testing? If so, for which tests? Describe how it works. Where is it available? How often are tests administered?

There is no examination for licensure of an institution.

26. Are there existing statutes that hinder the efficient and effective processing of applications and/or examinations? If so, please describe.

Within existing statutes which are specific to the Bureau, there are none which hinder the processing of applications. There is no examination.

School approvals

27. Describe legal requirements regarding school approval. Who approves your schools? What role does BPPE have in approving schools? How does the Bureau work with BPPE in the school approval process?

This Bureau is the BPPE. The Bureau has oversight of all non-exempt, private postsecondary institutions in California.

28. How many schools are approved by the Bureau? How often are approved schools reviewed? Can the Bureau remove its approval of a school?

As of June 30, 2015, the Bureau has approved 2,076 institutional locations throughout California, including 1063 main campus locations, 455 branch locations, and 558 satellite locations.

Institutional approvals are valid for five years if the institution is approved as a non-accredited institution. With every renewal period an institution is required to submit an application for reapproval which must be reviewed for compliance with the statute and regulations. Institutions that are approved based upon their accreditation must submit an application for reapproval in conjunction with their reaccreditation. Further, every institution is mandated to receive at minimum one announced and one unannounced compliance inspection every five years.

If, after an investigation by the Bureau, the Bureau determines the institution is not operating in compliance with the law, the Bureau may take disciplinary action against the institution which can include an action to revoke the institution's approval to operate.

29. What are the Bureau's legal requirements regarding approval of international schools?

The Bureau requires a school operating in California to have a California contact and a physical location in California.

Continuing Education/Competency Requirements

30. Describe the Bureau's continuing education/competency requirements, if any. Describe any changes made by the Bureau since the last review.

There is no continuing education requirement for institutions approved by the Bureau, thus items 30(a) through 30(i) are not applicable.

a. How does the Bureau verify CE or other competency requirements?

N/A

b. Does the Bureau conduct CE audits of licensees? Describe the Bureau's policy on CE audits.

N/A

c. What are consequences for failing a CE audit?

N/A

d. How many CE audits were conducted in the past four fiscal years? How many fails? What is the percentage of CE failure?

N/A

e. What is the Bureau's course approval policy?

N/A

f. Who approves CE providers? Who approves CE courses? If the Bureau approves them, what is the Bureau application review process?

N/A

g. How many applications for CE providers and CE courses were received? How many were approved?

N/A

h. Does the Bureau audit CE providers? If so, describe the Bureau's policy and process.

N/A

i. Describe the Bureau's effort, if any, to review its CE policy for purpose of moving toward performance based assessments of the licensee's continuing competence.

N/A

Section 5 – Enforcement Program

31. What are the Bureau's performance targets/expectations for its enforcement program? Is the Bureau meeting those expectations? If not, what is the Bureau doing to improve performance?

The Bureau utilizes the performance targets and expectations established by the Department of Consumer Affairs (DCA). The Consumer Protection Enforcement Initiative (CPEI) provides performance measures and targets for the various aspects of the enforcement process. Although the CPEI was initially established for the healing arts boards, the Bureau adopted this model and has set goals to complete investigations that do not involve formal discipline within 180 days.

The Bureau's average time to close a complaint has increased over the past four fiscal years. This is mostly a result of management investing significant time in training staff which has led to more thorough desk reviews and investigations.

The Bureau is utilizing the services of the DCA Complaint Resolution Program (CRP) to help resolve complaints that are considered routine in nature and do not have a potential for student harm.

Additionally, to achieve better results of desk reviews and investigations, all enforcement staff are required to attend the DCA Enforcement Academy and the National Certification for Investigators and Inspectors. In fiscal year 2014-15, the Bureau contracted with the Office of the Attorney

General to provide training specific to the investigation of complaints, how to write reports, and witness testifying.

32. Explain trends in enforcement data and the Bureau's efforts to address any increase in volume, timeframes, ratio of closure to pending cases, or other challenges. What are the performance barriers? What improvement plans are in place? What has the Bureau done and what is the Bureau going to do to address these issues, i.e., process efficiencies, regulations, BCP, legislation?

The Bureau has seen an increase in the number of complaints received since the last sunset report. The Bureau attributes this, in part, to the increase in the number of compliance inspections conducted by the Bureau as well as outreach events that the Bureau attends. The outreach the Bureau conducts provides more exposure to individuals that did not know the Bureau existed.

The Bureau was provided 11 Limited Term (LT) positions in the 2014/15 fiscal year. The recruitment of staff to fill these positions proved difficult, as often those with limited or no experience in investigations applied for these LT positions in order to begin their state service career. Retention of staff recruited for these positions proved difficult as staff left for permanent or more secure positions. Management and staff invested a significant amount of time training these individuals which took away from the processing and reviewing of complaints.

For the 2015/16 fiscal year, the Bureau submitted, and received approval for Budget Change Proposal (BCP 1111-002) to make the 11 LT positions permanent and to obtain more staff to work on the current backlog; as a result, the Bureau is currently in the process of advertising and filling those additional positions.

Effective January 1, 2015, Senate Bill 1247 mandated guidelines for the prioritization of complaints. California Education Code (CEC) 94941(e) states:

The bureau shall, in consultation with the advisory committee, adopt regulations to establish categories of complaints or cases that are to be handled on a priority basis. The priority complaints or cases shall include, but not be limited to, those alleging unlawful, unfair or fraudulent business acts or practices, including unfair, deceptive, untrue, or misleading statements, including all statements made or required to be made pursuant to the requirements of this chapter, related to any of the following:

- (1) Degrees, educational programs, or internships offered the appropriateness of available equipment for a program, or the qualifications or experience of instructors.*
- (2) Job Placement, graduation, time to complete an educational program, or educational program or graduation requirements.*
- (3) Loan eligibility, terms, whether the loan is federal or private, or default or forbearance rates.*
- (4) Passage rates on licensing or certification examinations or whether an institution's degrees or educational programs provide students with the necessary qualifications to take these exams and qualify for professional licenses or certifications.*
- (5) Cost of an educational program, including fees and other nontuition charges.*
- (6) Affiliation with or endorsement by any government agency, or by any organization or agency related to the Armed Forces, including, but not limited to, groups representing veterans.*
- (7) Terms of withdrawal and refunds from an institution.*
- (8) Payment of bonuses, commissions, or other incentives offered by an institution to its employees or contractors.*

The Bureau is in the process of developing regulatory guidelines to implement these provisions.

As noted earlier, the Bureau also contracted with CPS HR Consulting to perform a business process analysis. The Bureau has adopted these processes to make the work flow more efficiently.

Table 9a. Enforcement Statistics				
	FY 2012/13	FY 2013/14	FY 2014/15	FY 2015/16*
COMPLAINT				
Intake (Use CAS Report EM 10)				
Received	636	772	766	237
Closed	0	0	0	0
Referred to INV	636	772	766	499
Average Time to Close	0	0	0	0
Pending (close of FY)	0	0	0	0
Source of Complaint (Use CAS Report EM 10)				
Public	Unavailable	Unavailable	Unavailable	Unavailable
Licensee/Professional Groups	Unavailable	Unavailable	Unavailable	Unavailable
Governmental Agencies	Unavailable	Unavailable	Unavailable	Unavailable
Other	Unavailable	Unavailable	Unavailable	Unavailable
Conviction / Arrest (Use CAS Report EM 10)				
CONV Received	N/A	N/A	N/A	N/A
CONV Closed	N/A	N/A	N/A	N/A
Average Time to Close	N/A	N/A	N/A	N/A
CONV Pending (close of FY)	N/A	N/A	N/A	N/A
LICENSE DENIAL (Use CAS Reports EM 10 and 095)				
License Applications Denied	83	109	85	33
SOIs Filed	6	12	30	7
SOIs Withdrawn	3	7	12	11
SOIs Dismissed	0	0	12	0
SOIs Declined	0	0	0	0
Average Days SOI	156	288	245	129
ACCUSATION (Use CAS Report EM 10)				
Accusations Filed	1	0	4	3
Accusations Withdrawn	0	0	1	0
Accusations Dismissed	0	0	0	0
Accusations Declined	0	0	0	0
Average Days Accusations	337	0	1003	723
Pending (close of FY)	1	3	7	7

*Through October 31, 2015

Table 9b. Enforcement Statistics (continued)				
	FY 2012/13	FY 2013/14	FY 2014/15	FY 2015/16*
DISCIPLINE				
Disciplinary Actions (Use CAS Report EM 10)				
Proposed/Default Decisions	1	2	4	4
Stipulations	2	0	1	0

Average Days to Complete	413	638	1103	892
AG Cases Initiated	22	29	42	28
AG Cases Pending (close of FY)	18	32	44	58
Disciplinary Outcomes (Use CAS Report)				
Revocation	1	1	3	4
Voluntary Surrender	1	0	2	0
Suspension	0	0	0	0
Probation with Suspension	0	0	0	0
Probation	0	0	0	0
Probationary License Issued	0	0	0	0
Other	1	1	0	0
PROBATION				
New Probationers	0	0	0	0
Probations Successfully Completed	0	0	0	0
Probationers (close of FY)	0	0	0	0
Petitions to Revoke Probation	0	0	0	0
Probations Revoked	0	0	0	0
Probations Modified	0	0	0	0
Probations Extended	0	0	0	0
Probationers Subject to Drug Testing	N/A	N/A	N/A	N/A
Drug Tests Ordered	N/A	N/A	N/A	N/A
Positive Drug Tests	N/A	N/A	N/A	N/A
Petition for Reinstatement Granted	N/A	N/A	N/A	N/A
DIVERSION				
New Participants	N/A	N/A	N/A	N/A
Successful Completions	N/A	N/A	N/A	N/A
Participants (close of FY)	N/A	N/A	N/A	N/A
Terminations	N/A	N/A	N/A	N/A
Terminations for Public Threat	N/A	N/A	N/A	N/A
Drug Tests Ordered	N/A	N/A	N/A	N/A
Positive Drug Tests	N/A	N/A	N/A	N/A

*Through October 31, 2015

Table 9c. Enforcement Statistics (continued)				
	FY 2012/13	FY 2013/14	FY 2014/15	FY 2015/16*
INVESTIGATION				
All Investigations (Use CAS Report E)				
First Assigned	636	772	766	270
Closed	503	540	673	280
Average days to close	179	250	363	380
Pending (close of FY)	707	949	1050	1016
Desk Investigations (Use CAS Report E)				
Closed	324	451	431	176
Average days to close	145	211	265	354
Pending (close of FY)	451	676	569	368
Non-Sworn Investigation (Use CAS Report E)				
Closed	179	66	242	104
Average days to close	242	413	537	403
Pending (close of FY)	256	252	481	648

Sworn Investigation					
Closed	(Use CAS Report E)	6	21	11	2
Average days to close		200	758	379	365
Pending (close of FY)		19	9	4	4
COMPLIANCE ACTION (Use CAS Report 096)					
ISO & TRO Issued**		0	0	1	0
PC 23 Orders Requested		0	0	0	0
Other Suspension Orders		0	0	0	0
Public Letter of Reprimand		0	0	0	0
Cease & Desist/Warning		0	0	0	0
Referred for Diversion		N/A	N/A	N/A	N/A
Compel Examination		N/A	N/A	N/A	N/A
CITATION AND FINE (Use CAS Report EM 10 and 095)					
Citations Issued		16	14	116	36
Average Days to Complete		191	822	396	479
Amount of Fines Assessed		\$459,208	\$296,068	\$748,005.00	\$307,752
Reduced, Withdrawn, Dismissed		1	2	9	10
Amount Collected		\$12,255	\$10,000	\$45,251.00	\$123,320
CRIMINAL ACTION					
Referred for Criminal Prosecution		0	0	0	0

*Through October 31, 2015

**Emergency decisions

Table 10. Enforcement Aging							
	FY 2011/12	FY 2012/13	FY 2013/14	FY 2014/15	FY 2015/16*	Cases Closed	Average %
Attorney General Cases (Average %)							
Closed Within:							
1 Year	1	0	0	0	8	9	35%
2 Years	1	3	2	1	5	12	50%
3 Years	0	0	0	1	1	2	8.33%
4 Years	0	0	0	0	0	0	0%
Over 4 Years	0	0	0	0	1	1	4.17%
Total Cases Closed	2	3	2	2	15	24	100%
Investigations (Average %)							
Closed Within:							
90 Days	266	223	191	223	95	998	39.82%
180 Days	135	100	100	108	50	493	19.67%
1 Year	77	95	96	103	39	410	16.36%
2 Years	31	78	110	107	37	363	14.49%
3 Years	1	7	34	86	30	158	6.33%
Over 3 Years	0	0	9	46	29	84	3.35%
Total Cases Closed	510	503	540	673	280	2506	100%

*Through October 31, 2015

33. What do overall statistics show as to increases or decreases in disciplinary action since last review.

Disciplinary Cases:

FY 2011/12 – 9
FY 2012/13 – 20
FY 2013/14 – 26
FY 2014/15 – 42

There has been a 110% increase since the last review (2012-13), but a 366% increase from FY 2011-12 to FY 2014-15.

34. How are cases prioritized? What is the Bureau's compliant prioritization policy? Is it different from DCA's *Complaint Prioritization Guidelines for Health Care Agencies* (August 31, 2009)? If so, explain why.

In 2014 the Bureau began drafting prioritization guidelines that were directly related to data available from the institutions and the trends that the Bureau identified in complaints and compliance inspections. However, with the passage of SB 1247 the Bureau was provided specific prioritization guidelines and a mandate to promulgate regulations in order to implement the guidelines. The Bureau has consulted with the Advisory Committee and is in the process of promulgating the regulations regarding prioritization. Prior to this the Bureau was using DCA's *Complaint Prioritization Guidelines for Health Care Agencies*.

While regulations are being promulgated, the Bureau has established a prioritization methodology that incorporates the Consumer Protection Enforcement Initiative and the statute to determine a risk assessment score for the complaints. The risk assessment score for complaints is based on the following criteria:

- Allegations of complaint
- Population of surrounding community (where institution is located)
- Number of open/closed complaints
- Age of complaint
- Institution status (active, expired, unapproved)

The risk score is then used to categorize the complaint. Complaints categories include:

- Urgent
- High
- Routine

The categories are used to prioritize the complaints. Urgent priority complaints are assigned to field investigators. High priority complaints are assigned to desk analysts and the routine complaints are assigned to the DCA Complaint Resolution Program and/or desk analysts.

35. Are there mandatory reporting requirements? For example, requiring local officials or organizations, or other professionals to report violations, or for civil courts to report to the Bureau actions taken against a licensee. Are there problems with the Bureau receiving the required reports? If so, what could be done to correct the problems?

There is no mandated reporting in the Act.

36. Does the Bureau operate with a statute of limitations? If so, please describe and provide citation. If so, how many cases have been lost due to statute of limitations? If not, what is the Bureau's policy on statute of limitations?

The Act does not contain a statute of limitations or deadline for the Bureau to file an enforcement or disciplinary action. The Bureau's policy is to conduct thorough investigations and take disciplinary action as necessary to protect students.

For student claims under the former law, according to California Education Code (CEC) section 94809.5:

Notwithstanding any other provision of law:

- (a) For any claims that a student had based on a violation of the Private Postsecondary and Vocational Education Reform Act of 1989 on or before June 30, 2007, the period of time from June 30, 2007, to December 31, 2009, inclusive, shall be excluded in determining the deadline or the statute of limitation for filing any claim with the bureau or a lawsuit based on any claim.
- (b) All claims described in subdivision (a), except claims to the Student Tuition Recovery Fund, including those contained in a lawsuit or other legal action, shall be determined or adjudicated based on the law that was in effect when the violations or events took place, even though those provisions have become inoperative, been repealed, or otherwise expired.

For student claims to the Student Tuition Recovery Fund, CCR, title 5, section 76200(b) provides:

The application must be fully completed and received by the Bureau, with supporting documents that include, but need not be limited to, the enrollment agreement, promissory notes, if any, and any receipts, within two years from the date of the closure notice explaining the student's rights under STRF, whether provided by the institution or the Bureau, or a maximum of four years if the student receive no closure notice.

37. Describe the Bureau's efforts to address unlicensed activity and the underground economy.

The Bureau has established a team of staff that is responsible for researching unlicensed institutions in California. In addition, field investigators and compliance inspectors when in the field are cognizant of reporting possible unlicensed institutions observed.

Since the current Bureau was established in 2010, twenty-three citations have been issued for unlicensed activity.

FY 2010/11 – 0
FY 2011/12 – 2
FY 2012/13 – 9
FY 2013/14 – 6
FY 2014/15 – 6

Cite and Fine

38. Discuss the extent to which the Bureau has used its cite and fine authority. Discuss any changes from last review and describe the last time regulations were updated and any changes that were made. Has the Bureau increased its maximum fines to the \$5,000 statutory limit?

The Bureau utilizes its cite and fine authority to address violations of the law that do not warrant formal disciplinary action. Fine amounts range from \$50 to \$5,000 except for unlicensed activity where a fine can be up to \$50,000.

The Bureau has four classes of citation:

“Class A” violation shall not be less than \$2,501 or more than \$5,000. A Class A violation is one that the Bureau, in its discretion, determined to be more serious in nature, deserving the maximum fine. A Class A violation may, in the Bureau’s discretion, be issued to an institution that has committed one or more prior, separate Class B violations.

“Class B” violation shall not be less than \$1,001 or more than \$2,500. A Class B violation is one that the Bureau has, in its discretion, determined to be less serious in nature and may include, but is not limited to, a violation that could have resulted in student harm. Typically some degree of mitigation will exist. A Class B violation may be issued to an institution that has committed one or more prior, separate Class C violations.

“Class C” violation shall not be less than \$501 or more than \$1,000. A Class C violation is one that the Bureau has, in its discretion, determined to be a minor or technical violation, which may be directly or potentially detrimental to students or potentially impacts their education.

“Class D” violation shall not be less than \$50 or more than \$500. A Class D violation is one that the Bureau has, in its discretion, determined to be a minor or technical violation, which is neither directly or potentially detrimental to students nor potentially impacts their education.

39. How is cite and fine used? What types of violations are the basis for citation and fine?

Cite and Fine is used for cases where a violation of the law occurred and formal discipline is not warranted. See response above for examples.

40. How many informal office conferences, Disciplinary Review Committees reviews and/or Administrative Procedure Act appeals of a citation or fine in the last 4 fiscal years?

Over the past four fiscal years, the Bureau has held forty-one (41) informal office conferences, sixty-six (66) citations were appealed and twenty-one (21) administrative hearings were requested.

41. What are the 5 most common violations for which citations are issued?

The five most common violations for which citations are issued:

- 1- CEC section 94910 Failure to meet minimum requirements for the School Performance Fact Sheet.
- 2- CEC section 94909 Failure to meet minimum requirements for the School Catalog.
- 3- CEC section 94911 Failure to meet minimum requirements for the Enrollment Agreement.
- 4- CEC section 94886 Approval to operate required
- 5- 5 CCR section 76130(b) Failure to collect and/or submit Student Tuition Recovery Fund assessments.

42. What is average fine pre- and post- appeal?

The average fine amount pre-appeal is \$27,368.91 and post-appeal is \$12,018.26.

43. Describe the Bureau’s use of Franchise Tax Board intercepts to collect outstanding fines.

When a fine is levied against an institution, it is provided 30 days to respond or pay. If payment is not received within the specified time, three demand letters are sent to the institution/owner in 30 day increments. If payment is not received after the third demand letter, the Bureau works with DCA Accounts Receivable office to establish a Franchise Tax Board (FTB) account number and have the information submitted to FTB for collection. The FTB intercepts tax refunds and/or lottery winnings and forwards those funds to the Bureau. The account remains open until the fees are collected in full.

Cost Recovery and Restitution

44. Describe the Bureau's efforts to obtain cost recovery. Discuss any changes from the last review.

Cost recovery is requested for all accusations. Business and Professions Code section 125.3 provides cost recovery authority to boards/bureaus within the DCA. The Bureau refers disciplinary cases to the Attorney General's (AG) Office for the filing of an accusation. All Bureau accusations have the possibility of an order for cost recovery. An administrative law judge (ALJ) makes a proposed decision whether or not to grant the cost recovery. The amount of the cost recovery requested/ordered is based upon a certification of hours provided by the investigator.

45. How many and how much is ordered by the Bureau for revocations, surrenders and probationers? How much do you believe is uncollectable? Explain.

The Bureau has ordered \$299,413.19 in cost recovery. To date, the Bureau has recovered \$10,000 in cost recovery (Table 11). The Bureau is unable to recover the costs due to the final orders stating that the costs are due when/if the school/owner(s) apply for an approval to operate from the Bureau or any of its successors; the vast majority do not apply.

46. Are there cases for which the Bureau does not seek cost recovery? Why?

The Bureau seeks cost recovery whenever possible.

47. Describe the Bureau's use of Franchise Tax Board intercepts to collect cost recovery.

The process works the same as that used for citations. See above Item 43.

48. Describe the Bureau's efforts to obtain restitution for individual consumers, any formal or informal Bureau restitution policy, and the types of restitution that the Bureau attempts to collect, i.e., monetary, services, etc. Describe the situation in which the Bureau may seek restitution from the licensee to a harmed consumer.

The Bureau may seek restitution for an individual or groups of students through the administrative process, that is, when the Bureau is taking an administrative action against an institution or, issuing a citation, the Bureau may include restitution as part of the order. This is usually done when the Bureau has determined that harm has been done by an institution operating without approval or offering programs without approval. In those cases, the Bureau has sought a refund of all monies paid by the student to the institution.

The Bureau has a Student Tuition Recovery Fund that is used to relieve or mitigate economic loss suffered by a student while enrolled in an educational program at an institution that is not exempt from Bureau oversight, who at the time of enrollment, was a California resident or was enrolled in a California residency program, prepaid tuition and suffered an economic loss.

Table 11. Cost Recovery					(list dollars)
	FY 2011/12	FY 2012/13	FY 2013/14	FY 2014/15	FY 2015/16*
Total Enforcement Expenditures	\$2,380	\$3,296	\$2,986	\$5,046	\$7,112
Potential Cases for Recovery **	1	4	2	3	0
Cases Recovery Ordered	1	4	2	3	0
Amount of Cost Recovery Ordered	\$50,000	\$71,653.42	\$139,266.88	\$38,492.89	0
Amount Collected	0	0	\$10,000	0	0
*Through October 31, 2015					
** "Potential Cases for Recovery" are those cases in which disciplinary action has been taken based on violation of the license practice act.					

Table 12. Restitution					(list dollars)
	FY 2011/12	FY 2012/13	FY 2013/14	FY 2014/15	FY 2015/16*
Amount Ordered	0	\$2,116,180.00	0	0	0
Amount Collected	0	0	0	0	0

Section 6 – Public Information Policies

49. How does the Bureau use the internet to keep the public informed of Bureau activities? Does the Bureau post Bureau meeting materials online? When are they posted? How long do they remain on the Bureau’s website? When are draft meeting minutes posted online? When does the Bureau post final meeting minutes? How long do meeting minutes remain available online?

The Bureau maintains a website and social media presence, including Facebook and Twitter, along with utilizing E-blasts, emails regarding events affecting the Bureau and the industry. The Bureau posts meeting materials online at least ten days before an Advisory Committee Meeting. These postings remain on the website indefinitely. Furthermore, draft meeting minutes are posted with the meeting materials for the following meeting and the final minutes for a meeting are generally posted within a month of the meeting in which the minutes were approved by the committee. These minutes also remain posted indefinitely.

50. Does the Bureau webcast its meetings? What is the Bureau’s plan to webcast future Bureau and committee meetings? How long to webcast meetings remain available online?

The Bureau has webcast every Advisory Committee meeting since 2012 and every Task Force meeting. It is intended that that all future meetings will likewise be webcast whenever possible. Webcasts of the meetings will remain online indefinitely.

51. Does the Bureau establish an annual meeting calendar, and post it on the Bureau’s web site?

The Bureau establishes an annual meeting calendar in January of each year for the quarterly Advisory Committee Meetings. The schedule is posted on the Bureau's web site.

52. Is the Bureau's complaint disclosure policy consistent with DCA's *Recommended Minimum Standards for Consumer Complaint Disclosure*? Does the Bureau post accusations and disciplinary actions consistent with DCA's *Web Site Posting of Accusations and Disciplinary Actions* (May 21, 2010)?

The Bureau's complaint disclosure policy is consistent with the DCA's *Recommended Minimum Standards for Consumer Complaint Disclosure*. The Bureau posts accusations and disciplinary actions consistent with the DCA's *Web Site Posting of Accusations and Disciplinary Actions*.

53. What information does the Bureau provide to the public regarding its licensees (i.e., education completed, awards, certificates, certification, specialty areas, disciplinary action, etc.)?

The Bureau's website contains a directory of approved institutions which includes the programs the institution is approved to offer along with the institution's contact information. The website also has Annual Reports, School Catalogs and Performance Fact Sheets, along with Compliance Inspections, including results of the inspection, and disciplinary actions. Since October 2015 the Bureau has been posting on its website those schools that were denied approval to operate.

54. What methods are used by the Bureau to provide consumer outreach and education?

The Bureau uses its website and outreach calendar along with Facebook, Twitter, and E-mail blasts to keep the public informed of ongoing and upcoming events. The Bureau also attends events such as college fairs along with the California Student Aid Commission, which informs students of the Bureau and the resources available to them from the Bureau. Additionally, the Bureau provides workshops, including a licensing workshop and a compliance workshop, to help educate institutions and increase compliance.

When institutions close precipitously the Bureau sends staff to the institution or, if that is not possible, finds a nearby location in order to meet with students impacted by the closure and inform them of their rights as students and information on the Student Tuition Recovery Fund. The Bureau also provides information on closed school loan discharges when applicable.

Section 7 – Online Practice Issues

55. Discuss the prevalence of online practice and whether there are issues with unlicensed activity. How does the Bureau regulate online practice? Does the Bureau have any plans to regulate internet business practices or believe there is a need to do so?

The Bureau reviews distance education programs being offered by institutions with a physical presence in California for compliance with operating standards in conjunction with application processing and compliance inspections. The Bureau also reviews institutional websites for compliance with statute and regulation.

Section 8 – Workforce Development and Job Creation

56. What actions has the Bureau taken in terms of workforce development?

The Bureau works with the Employment Development Department's Workforce Investment Board (WIA Board) to provide the information the WIA Board needs to determine compliance with its regulations. Further, the Bureau has been working with the Department of Industrial Relations to determine appropriate oversight of pre-apprenticeship programs.

57. Describe any assessment the Bureau has conducted on the impact of licensing delays.

The Bureau understands that having a backlog of applications for approval to operate creates delays in schools opening. The Bureau received additional staffing in fiscal year 15/16 and ongoing in order to address the backlog that was caused by the Bureau's inability to hire when it was created.

58. Describe the Bureau's efforts to work with schools to inform potential licensees of the licensing requirements and licensing process.

In 2014 the Bureau introduced "Application Workshops." The workshops provide instruction on how to complete the "Application for Approval to Operate an Institution Not Accredited" and staff from the licensing unit provides instruction on how to best present material for Bureau review. Further, the workshops make Bureau staff available to applicants to address any questions they have.

59. Provide any workforce development data collected by the Bureau, such as:

- a. Workforce shortages: The Bureau has formed a Task Force to review institutions that provide instruction in writing computer code and other high technology fields. Information on the Innovative Subject Matters Task Force is posted on the Bureau's website.
- b. Successful training programs: The Bureau publishes the annual reports of the schools showing program outcomes including completion and placement rates.

Section 9 – Current Issues

60. What is the status of the Bureau's implementation of the Uniform Standards for Substance Abusing Licensees?

Uniform Standards for Substance Abusing Licensees does not apply to the Bureau as the Bureau licenses applicants which can be either a natural person or a business organization, irrespective of its form, per California Education Code sections 94816 and 94855.

61. What is the status of the Bureau's implementation of the Consumer Protection Enforcement Initiative (CPEI) regulations?

The Bureau sends monthly reports to the Department regarding its enforcement timelines. As discussed earlier, these are included as Attachment E

62. Describe how the Bureau is participating in development of BreEZe and any other secondary IT issues affecting the Bureau.

The Bureau is in Release III of BreEZe. However, Release III schedule has been changed and is currently To Be Announced. Other IT issues are discussed in more detail below in Section 10, Issue 2) “Outdated technology systems and the implementation of BreEZe.”

Section 10 – Bureau Action and Response to Prior Sunset Issues

Include the following:

1. Background information concerning the issue as it pertains to the Bureau.
2. Short discussion of recommendations made by the Committees/Joint Committee during prior sunset review.
3. What action the Bureau took in response to the recommendation or findings made under prior sunset review.
4. Any recommendations the Bureau has for dealing with the issue, if appropriate.

There were 26 issues raised during the prior sunset review. Many of the issues were addressed in SB 1247 which extended the Bureau’s sunset for two years. Some have not been addressed.

Prior Issue #1: Current Staffing and Allocation of Resources are Inadequate

Staff Recommendation: The Bureau should advise the Committees what steps it is taking to ensure that licensing backlogs are reduced and enforcement timelines are improved. The Bureau should also identify what additional staffing and resources are necessary to deal with these delays.

The Bureau informed the committee that a workforce study was underway and the results of the workforce study would be evaluated and implemented. In February, 2015, CPS HR Consulting Services issued the second of three reports. The second report recommended the Bureau convert limited term positions to permanent full time positions and add additional staff to address the backlog and ongoing workload. This position authority was intended to address ongoing workload and backlog reduction. The report also provided recommendations for process improvements. Those recommendations included creation of an “annual reports unit” that would be devoted to reviewing the documentation that is submitted with the annual report. The work done by this unit could be utilized by all units within the Bureau. The report recommended complaint prioritization, continuing the streamlining of the compliance inspection process (already in process) and eliminating or reducing the number of deficiency letters for licensing applications (already implemented).

As a result of the study, the Bureau moved forward with a Spring Finance Letter and ultimately received authority to convert 17 limited term positions to full time/permanent positions, add an additional 10 positions permanent/full time and additional funding for overtime, permanent/intermittent positions and temporary help.

In anticipation of approval of the request, the Bureau began the process to create the positions, draft the duty statements, acquire space for the additional staff, order the additional equipment necessary and develop training plans. As soon as possible after the required approvals, the positions were advertised and as of October 31, 2015, the positions have been filled. Sixteen of the seventeen

positions converted from Limited Term to Permanent are filled with the final position in the process of being filled.

Prior Issue #2: Outdated Technology Systems and the Implementation of BreEZe

Staff Recommendation: *The Bureau should provide an update of anticipated timelines, existing impediments and the current status of utilizing BreEZe, as well as any intermediate efforts underway intended to improve the Bureau's information collection and tracking systems.*

As the committees are aware, there has been and continues to be much discussion surrounding the BreEZe data system being developed by the DCA. The Bureau was scheduled to be in Release III of BreEZe.

The Bureau is working with a vendor to develop the requirement specifications and business flow documentation for an upgrade to the current system for institutional submission and bureau processing of the institutional Annual Report. The first planning phases and requirements gatherings are in process as of October, 31 2015 and the Bureau will be able to move to the next step in implementing the changes. The Bureau remains optimistic in the ability to get the changes made timely, and we continue to work toward an implementation date of December, 2016. Therefore, these intermediate efforts are intended to improve the Bureau's information and tracking systems by allowing the Bureau to automate the way it collects and utilizes institutional data which will integrate into the prioritization of compliance inspections and complaint investigations as required by SB 1247.

Prior Issue #3: Underutilized Advisory Committee

Staff Recommendation: *The Bureau may consider consulting Advisory Committee members more frequently and provide additional opportunities for Advisory Committee meetings to better include public dialogue to assist the Bureau in its work enforcing the Act and also as a means of solving some of the operational problems the Bureau currently faces.*

The Advisory Committee has met quarterly since November, 2014 with meeting dates set a year in advance. The Advisory Committee has provided input on every regulation package that the Bureau has brought forward with informed discussion on key points. Further, the Advisory Committee has been provided the Bureau's procedures for review and comment. The August, 2015 and November, 2015 meetings included the mandated discussion of the fee schedule.

Prior Issue #4: Insufficient Spending Authority

Staff Recommendation: *The Bureau should be granted additional spending authority to improve operations and increase efficiency through the hiring of appropriate staff, the ability to conduct regular staff trainings, the purchase of an enhanced data tracking system and other tools necessary for the Bureau to meet its consumer protection mandate, as well as provide quality regulation of private postsecondary educational institutions. The Committees may also wish to change the mechanism by which fees are reduced, when necessary, and delete the provision authorizing BPPE staff to decrease fees if it determines that the cost of regulation of an institution is less than the cost of fees.*

SB 1247 eliminated the alternative annual fee calculation and provided authorization for two additional staff and staff training. As a result of the mandates in SB 1247, the Bureau was able to submit and have approved two BCPs for 2015-16 and ongoing. The increased spending authority will allow for the hiring of 20 additional permanent full time staff, conversion of 17 existing limited term positions to permanent full time, one limited term position and additional resources upon approval from the Department of Finance for overtime, temporary help and permanent intermittent staff to address the Bureau's licensing and enforcement backlogs.

Moving forward, the Bureau feels there is sufficient spending authority to eliminate the backlogs and address the normal workload.

Prior Issue #5: Unaccredited Degree Granting Programs

Staff Recommendation: . The Committees may wish to amend the Act to increase the quality of educational programs in California by requiring institutions offering a degree to be accredited in order to obtain BPPE approval to operate. The Committees may wish to provide a phase-in period for this requirement to allow unaccredited degree programs time to meet the accreditation requirement. The Committees may also wish to require that currently unaccredited degree granting programs either change their program to offer certificates or update the Bureau as to their plan for obtaining accreditation. The Committees may also wish to require new institutions applying to the Bureau as an unaccredited degree granting program to provide a similar plan for accreditation with their initial application for approval.

With the provision in SB 1247 that all degree granting institutions be accredited by July 1, 2020, the Bureau has commenced the process of reviewing plans for accreditation that have been submitted by degree granting institutions and forming visiting committees in order to review institutional progress toward accreditation. During July 2015, the Bureau issued orders for automatic suspension of approvals to operate to eleven institutions that failed to provide the Bureau their plan for achieving accreditation by July 1, 2015. As of August 1, 2015 there are approximately 107 institutions that are unaccredited and offering degrees. Those institutions have submitted a plan to achieve accreditation by July 1, 2020. The Bureau is currently in the process of training staff to organize site visits to verify progress toward accreditation.

Prior Issue #6: Oversight by BPPE of Distance Learning

Staff Recommendation: The Committees may wish to examine the issue of reciprocity . agreements further prior to authorizing the Bureau to enter into agreements. While SARA is the most frequently discussed option for reciprocity in distance education regulation, there may be other options and avenues in the future. The Committees may wish to establish standards for the reciprocity agreements BPPE enters into, if any, and basic protections that must be in place prior to California entering into an agreement.

This issue was not addressed in prior legislation but legislation has been introduced to allow California to participate in SARA; however the bill failed to pass out of the Senate Committee on Education by the required deadline. At present approximately 27 states have joined SARA, but others have plans to join at some point in the future.

Prior Issue #7: Exemption of Regionally Accredited Schools

Staff Recommendation: *Students are best protected by a single system for regulation of private postsecondary institutions in California. A pathway exists currently for exempt institutions to maintain Title IV eligibility by voluntarily coming under the Bureau's jurisdiction. The Committees may wish to establish criteria other than the type of or lack of accreditation for the Bureau to focus its efforts. The Bureau should update the Committees on the number of regionally accredited institutions that have submitted applications or been granted licensure by the Bureau. The Bureau should explain to the Committees any challenges that could arise if some schools are only subject to some provisions of the Act while others were subject to all provisions.*

The Bureau response at the time was that there had been approximately ten non-WASC regionally accredited institutions that had submitted applications for approval to operate with the Bureau. As a result of the United States Department of Education requirements for state authorization and the requirement that was put in to place by SB 1247 that all institutions receiving funding for their veteran students must be approved by the Bureau, that number has grown to approximately 22 WASC and non-WASC accredited institutions that have applied for approval to operate with the Bureau.

Prior Issue #8: Transferability and the Requirement for Certain Types of Accreditation by DCA Entities

Staff Recommendation: *The Committees may wish to create uniformity for the accreditation of educational institutions attended by potential licensees of DCA boards. The Committees may also wish to establish a task force comprised of board representatives, students, faculty, higher education experts and representatives from accrediting agencies to provide advice on the issues of appropriate accreditation and options for transferability from certain institutions like those regulated by the Bureau to other segments of higher education in California. The Committees may wish to clarify required disclosures to students related to transferability to ensure that they are provided in easily understandable language and may wish to require that schools provide information about the institutions with which they have articulation agreements.*

This issue was not addressed in SB 1247 and the Bureau has no oversight of accreditation standards for other DCA Boards and Bureaus or transferability of educational credits.

Prior Issue #9: Relationship of the Bureau to Other Licensing Entities

Staff Recommendation: *The Bureau should describe the current MOUs it has with other entities and the MOUs it is currently working to establish. The Committees may wish to better understand the role of, and efforts by DCA to promote educational quality in workforce training programs approved, recognized or required by DCA boards for licensure. The Committees may wish to ensure that the Bureau establish partnerships and working relationships with DCA boards, but should be cautious about replacing Bureau responsibilities entirely by formally transferring school evaluation to licensing entities, as suggested in the BSA report. The Committees may wish to strengthen the Act to ensure that students are receiving training that allows them to become licensed when the intention of their enrollment is licensure.*

The Bureau has MOUs with three other licensing entities within the Department: the Board of Registered Nursing, the Board of Barbering and Cosmetology, and the Board of Vocational Nursing

and Psychiatric Technicians. Presently the Bureau is working on an MOU with the California State Approving Authority for Veteran Education (CSAAVE).

ISSUE #10: Massage Therapy Schools

Staff Recommendation: *The Committees may wish to amend the Private Postsecondary Education Act to clarify that the BPPE shall take into consideration either the approval or disapproval of a massage therapy school by the CAMTC and both entities should enter into a more formal MOU to delineate the role each entity has in approving massage therapy schools.*

SB 1247 did not address this issue; however, the Bureau meets and discusses common issues with the California Massage Therapy Council.

ISSUE #11: English Language Training Programs

Staff Recommendation: *It does not appear necessary to make statutory changes to ensure that ELTPs are qualified for exemptions from the Act and that their specific programs are defined to ensure that exemption. The Bureau should update the Committees on its continued outreach and communication with ELTPs solely offering ESL programs, subject to the requirements established by SEVP, and advise the Committees under what circumstances changes to the Act related to these institutions are necessary.*

The Bureau agreed that clarification in the Act may not be necessary; the matter could be resolved through regulation. Since the prior report, the Advisory Committee has discussed the possibility of amending regulations to provide certain English Language Schools (ESL) exemption from the law. However, the regulations mandated by statute have taken priority. Regulations regarding ESL schools may be promulgated sometime during 2016.

ISSUE #12: Flight Schools

Staff Recommendation: *The Committees may wish to amend the Act to ensure that flight schools exempt from the act are prohibited from collecting more than \$2500 in prepayment from students, clarifying current law so a flight school actually charging \$2500 or more up front is not able to be granted an exemption simply on the technicality that they do not require prepayment.*

The Bureau supported such a proposal at the time and has implemented the changes made in SB 1247.

ISSUE #13: Coding Academies

Staff Recommendation: *The Committees may wish to evaluate whether students attending bootcamps should receive certain disclosures prior to enrollment and whether reporting of student outcomes are appropriate. The Committees may wish to consider whether it is appropriate to regulate bootcamps in the same manner and subject to the same provisions of the Act as other private training programs. The Committees may wish to allow for temporary approval of bootcamps under the Act or temporarily exempt bootcamps from the Act for one year (provided that bootcamps meet strict refund requirements) , and revisit the issue of appropriate state regulation, working collectively with stakeholders like the Bureau, bootcamp owners and operators, former students, employers, state*

agencies and higher education experts. The Committees may also wish to evaluate what steps the state and Bureau can take to generally promote the growth of high quality programs intended to train for jobs in the ever-growing high tech field.

SB 1247 mandated that the Bureau form a Task Force for high technology training schools. The Task Force was organized in early 2015, and the composition was announced at the February 18, 2015 Advisory Committee meeting. The Task Force has been meeting regularly and is on target to meet the deadlines for submission of the required report to the Advisory Committee by January 1, 2016.

ISSUE #14: Transitional Provisions

Staff Recommendation: *The Committees may wish to eliminate the de-facto approval for institutions that began operating during the sunset period to ensure that schools not approved by the Bureau are not open for business.*

SB 1247 eliminated the de-facto approval to operate for institutions that commenced operation during the sunset period.

ISSUE #15: Licensing Enhancements

Staff Recommendation: *The Committees may wish to consider amending the Act to create pathways for a streamlined licensing process when identified and available, ensuring that program integrity and student information are not negatively impacted.*

This was not addressed in SB 1247.

ISSUE #16: Compliance Inspections

Staff Recommendation: *There is already precedent for certain criteria such as cohort default rate, restrictions on accreditation and high program cost without a demonstration of aptitude prior to enrollment to be likely indicators of an institution's ability to comply with the Act. The Committees may wish to delineate certain criteria in statute that could assist the Bureau in prioritizing its inspections of institutions. The Bureau may also wish to consult its Advisory Committee on the criteria it can use to identify institutions that may require more immediate attention and those that may not need to be inspected right away. The Committees may also wish to decrease the number of mandatory inspections to reflect a more workable number given the challenges the Bureau faces with staffing, workload and training, or eliminate a statutory timeframe altogether. The Committees may also wish to grant the Bureau flexibility in determining when to conduct announced and unannounced inspections based on an evaluation of any possible criteria used to prioritize the licensees that are inspected. The Committees may wish to require the Bureau to work with accrediting agencies to consolidate oversight visits to institutions.*

SB 1247 changed the amount of time the Bureau had to conduct compliance inspections from two years to five years. Further, prioritization criteria were outlined with a mandate to promulgate regulations in order to implement them. The regulations were discussed at the February 2015 Advisory Committee meeting and are presently going through the approval process. However, the Bureau has implemented prioritization metrics as a matter of policy where possible.

ISSUE #17: Unlicensed Activity

Staff Recommendation: *The Committees may wish to require the Bureau to establish a proactive program to identify unlicensed institutions, as recommended by BSA. The Committees may also wish to ensure that the Bureau takes proper action against unlicensed institutions, as recommended by BSA, by sanctioning these entities and tracking information related to enforcement. The Committees may also wish to amend the Act to allow the Bureau to post application denials on the Web site to make consumers aware in the event that an institution is operating without a license and has been denied by the Bureau. Given the significant consumer harm potential involved in operating an unlicensed school, the Committees may also wish to create stronger penalties for institutions operating without approval.*

SB 1247 requires the Bureau to post on its website denials that have exhausted the appeals process or not been appealed. The Bureau is in the process of posting all prior denials on the website. The Bureau had previously implemented processes for unlicensed activity.

ISSUE #18: Enforcement Improvements

Staff Recommendation: *The Committees may wish to clarify the Act to create consistent statutory language that ensures that approvals to operate are issued to institution owners and all disciplinary and enforcement actions are taken against institution owners. The Committees may also wish to review the due process implications of requiring an institution that has been denied a renewal to cease operations while an appeal is pending and working its way through the system toward a hearing. The Committees may wish to require the Bureau to have an investigative unit focused completely on deceptive marketing practices, given the severe nature of these violations and Bureau financial resources that could be dedicated to creating a unit staffed by experienced, trained investigators. The Committees may wish to allow the Bureau to determine whether an institution must close, depending on the seriousness of the violation and may wish to direct the Bureau to use the Emergency Decision pathway when students are at risk of harm.*

SB 1247 clarified that approvals are issued to “applicants,” who are persons (i.e., individuals or business organizations). This clarifies that disciplinary actions are taken against the person approved to operate the institution.

SB 1247 also clarified that persons approved to operate the institution that are denied their renewal to operate may continue to operate throughout the Administrative Procedure Process if the institution has appealed the denial. The Bureau does, however, require the institution to provide disclosures to current and prospective students that the institution has been denied its renewal to operate and may close if they are not successful with their appeal.

ISSUE #19: Complaints

Staff Recommendation: *The Committees may wish to ensure that the Bureau acquires additional, experienced investigative staffing in the appropriate classifications to effectively process complaints. The Committees may wish to ensure that Bureau staff receive more training in areas, as noted by BSA, like evidence-gathering techniques and knowledge about when they have sufficient evidence to advance or close complaints. The Committees may wish to amend the Act to outline a complaints process for the Bureau to follow, including criteria for determining the order in which complaints*

are addressed as well as the necessary documentation, information and resources that will assist in reviewing complaints, among other items.

SB 1247 mandated training for Bureau staff by the California Attorney General's office. To date, the Bureau has worked in conjunction with the Office of the Attorney General and conducted training for staff in the areas of evidence gathering, courtroom testifying and report writing. The Bureau is also working on additional training for understanding the statute and regulations and sufficiency of evidence. Further, SB 1247 provided prioritization guidelines that the Bureau is working to implement by promulgating regulations.

ISSUE #20: School Closures and STRF

Staff Recommendation: The Bureau should update the Committees on its efforts related to school closures and students impacted by school closures. The Bureau should continue to improve its administration of STRF and dedicate staff to ensuring that monies are properly collected, claims are swiftly processed and payouts are made in a timely fashion. The Bureau should update the Committees on its current efforts related to third-party payers and advise the Committees as to any statutory changes that could enhance STRF. The Committees may wish to expand the uses of STRF and evaluate the timelines under which students have to file a claim.

SB 1247 expanded the scope of STRF to include students that attended unapproved institutions. SB 1247 mandated regulations which were discussed at the Advisory Committee meeting held in November 2014 and February 2015. The regulations are currently going through the approval process. These proposed regulations provide that third party payer benefits can be part of a STRF claim and includes a new system for refunds based on that benefit

During 2015 the Bureau experienced the largest school closure to date. Corinthian Colleges, which included Everest and WyoTech, institutions regulated by the Bureau, and Heald College, which was not regulated by the Bureau, announced abruptly on April 26, 2015 that they were closing their doors as of April 27, 2015. This closure impacted eleven Everest and two WyoTech campuses and their 4,000+ students that were enrolled at the time of the school closure. Additionally, Heald College enrolled 7,000+ students. The Bureau responded to this closure by deploying 26 staff members to the Everest and WyoTech locations in order to meet with students, provide them information on their rights under the Student Tuition Recovery Fund and to answer any questions they may have regarding the fund. Bureau staff also provided the telephone numbers for the Bureau in the event the student had any further questions. Overall, Bureau staff met with approximately 3,200 (80%) of the Everest and WyoTech students enrolled at the time of the school closure and has since responded to over 9,000 telephone calls and e-mail requests for additional information or transcripts. The Bureau has received over 280 applications for relief under the Student Tuition Recovery Fund and continues to accept and process applications as they are received.

ISSUE #21: Veterans Educational Benefits Oversight

Staff Recommendation: The Committees may wish to require that any school in California receiving benefits administered by the VA and/or DOD must be approved by the Bureau and subject to the Act. The Committees may wish to specify that institutions accepting benefits administered by the VA and/or DOD provide students their associated money for living expenses and other costs within the timeframe established under federal law.

SB 1247 mandated that institutions may not claim an exemption from the law and still receive veteran's education benefits unless they were "independent institutions" or met the terms of a very specific exemption under the law. The Bureau sent letters to all institutions that it could determine were exempt from Bureau oversight and receiving veteran education benefits to notify them of this change

ISSUE #22: Disclosures, Data, Student Outcomes, and Measuring Student Performance

Staff Recommendation: The Committees may wish to authorize institutions receiving Title IV financial aid to report IPEDS data and data required under the Gainful Employment regulation to the Bureau on the School Performance Fact Sheet. The Committees may wish to require the Bureau to enter into an MOU with the Employment Development Department to gain access to the type of wage data available on Salary Surfer and as a means of verifying information reported by institutions. The Committees may also wish to require additional disclosures be made to potential students and reported to the Bureau such as information about any legal or administrative actions brought against an institution. The Committee may wish to enhance, simplify or substitute disclosures only in the event that students still receive the maximum amount of information to assist in making informed decisions about enrollment.

SB 1247 mandated additional information be collected from institutions in conjunction with the Performance Fact Sheet and Annual Report. The Bureau is currently promulgating regulations to implement the changes that were made. In addition to the mandated regulatory changes, SB 1247 required the Bureau to perform a study on various disclosures in order to determine if there is a better way to disclose information and avoid duplication. The Bureau has opted to look for an individual or organization outside of the Bureau to conduct the study into disclosures and to that end requested bids for completion of the work. The Bids closed on September 15, 2015 and it is the hope of the Bureau that work on this important disclosure document commences as soon as possible after the bid process closes.

ISSUE #23: Law School Disclosures

Staff Recommendation: The Committee may wish to amend the Act to authorize a law school accredited by the ABA, and owned by an institution operating under the Bureau, to satisfy the current disclosure requirements of the Fact Sheet by instead doing the following: complying with ABA disclosure requirements; reporting to the National Association for Law Placement; and making completion, Bar passage, placement, and salary and wage data available to prospective students prior to enrollment through the application process administered by the Law School Admission Council. The Committees may wish to ensure that any specific information required on the Fact Sheet that may help students make informed decisions is also disclosed by a law school under the Bureau's authority.

AB 834 Williams (Chapter 176, Section 2, Statutes of 2014) effected this change. The bill was effective on January 1, 2015, and the Bureau is implementing this bill.

ISSUE #24: Private Right of Action

Staff Recommendation: The Committees should not amend the Act to include a Private Right of Action. It does not appear as if a Private Right of Action would be in the best interest of students in regulating private postsecondary institutions. Instead, the necessary improvements to provide for a

more robust regulatory structure and coordination more fully with the AGs office in pursuing legal action against schools which violate the Act should be an immediate priority. The Committees should also ensure that the DAGs most familiar with consumer protection in California are assigned cases referred by the Bureau.

No changes were made in statute in the area of private right of action.

ISSUE #25: Technical Changes May Improve Effectiveness of the Act and BPPE Background:

Identified instances where technical clarification may be necessary:

- References in the Act to School Performance Fact Sheet but to Fact Sheet in the Bureau's regulations.
- Obsolete references to CPEC throughout the Act.
- Obsolete references to BPPVE throughout the Business and Professions Code.

Staff Recommendation: *The Committees may wish to amend the Act to include technical clarifications.*

The Bureau believes these technical changes were made.

ISSUE #26: Should the BPPE be Continued?

Staff Recommendation: *The Committees should seriously consider reconstituting the Bureau as an independent board comprised of members from the following categories: students who are or have attended schools regulated under the Act; individuals with a record of advocacy on behalf of consumers; representatives of private postsecondary education institutions; employers that hire institution graduates and; members of the public. Strong consideration should be made to include current Advisory Committee members as members of an independent board.*

While changes were made to the composition of the Advisory Committee, the Bureau remains a Bureau under the Department. The Bureau appreciates the continued support of the Committees.

Section 11 – New Issues

This is the opportunity for the Bureau to inform the Committees of solutions to issues identified by the Bureau and by the Committees. Provide a short discussion of each of the outstanding issues, and the Bureau's recommendation for action that could be taken by the Bureau, by DCA or by the Legislature to resolve these issues (i.e., policy direction, budget changes, legislative changes) for each of the following:

1. Issues that were raised under prior Sunset Review that have not been addressed.

The only outstanding issue the Bureau has identified is regarding the State Authorization Reciprocity Agreement (SARA). As noted earlier, legislation has been introduced to allow California to participate in SARA; however the bill failed to pass out of the Senate Committee on Education by the required deadline. If a bill to establish a pathway for participation in SARA was introduced, the Bureau would provide technical assistance.

2. New issues that are identified by the Bureau in this report.

The Bureau has raised the fiscal challenges that its fund is experiencing. The Advisory Group has begun discussing the current fee schedule and will likely make its recommendation(s) to the Bureau in early 2016.

3. New issues not previously discussed in this report.

Currently, the Bureau is mandated to perform two compliance inspections of every approved institution within the five-year approval period. In the course of a compliance inspection, the inspector may find a number of violations that would indicate a larger investigation of the institution is necessary. Under current law, the Bureau cannot use the compliance inspection results as the investigation. Instead, an investigator must visit the institution a second time and confirm the violations discovered during the compliance inspection and gather evidence on that visit for use in the investigation. This is problematic for a couple of reasons. First, the Bureau is duplicating the effort, which is a waste of resources. Second, an institution may become aware of certain violations during the course of the compliance inspection and make an effort to hide those violations in any subsequent visit by an investigator conducting an investigation. Eliminating this cumbersome requirement would provide better consumer protection because the limited resources of the Bureau would be better utilized, and investigators could potentially spend less time gathering evidence and more time processing the existing evidence, allowing them to process and complete more investigations in a shorter amount of time. These investigators respond to both outside consumer complaints as well as Bureau generated complaints, so efficiency in processing complaints is critical.

4. New issues raised by the Committees.

The Bureau is not aware of any new issues raised by the Committees at this time.

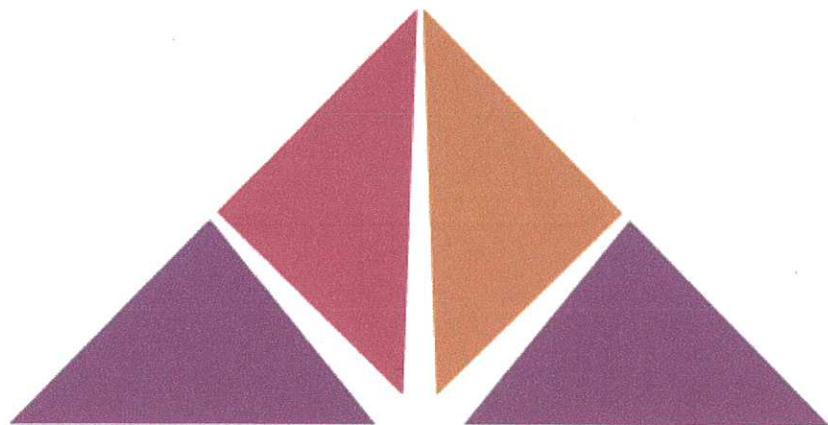
Section 12 – Attachments

Please provide the following attachments:

- A. Bureau's administrative manual.
- B. Current organizational chart showing relationship of committees to the Bureau and membership of each committee (cf., Section 1, Question 1).
- C. Major studies, if any (cf., Section 1, Question 4).
- D. Year-end organization charts for last four fiscal years. Each chart should include number of staff by classifications assigned to each major program area (licensing, enforcement, administration, etc.) (cf., Section 3, Question 15).
- E. Performance measure report as published on DCA website.

ADMINISTRATIVE MANUAL

Bureau for Private Postsecondary Education
2015 Policy and Procedure Manual



BPPPE

Bureau for Private Postsecondary Education

Overview of the Bureau

The Bureau for Private Postsecondary Education came into existence on January 1, 2010, following the passage of Assemble Bill 48, known as the California Private Postsecondary Education Act of 2004 (California Education Code, Title 3, Division 10, Part 59, Chapter 8).

Bureau Mission Statement

The Bureau exists to promote and protect the interests of students and consumers: (i) through the effective and efficient oversight of California's private postsecondary educational institutions, (ii) through the promotion and competition that rewards educational quality and employment outcomes, (iii) through proactively combating unlicensed activity, and (iv) by resolving student complaints in a manner that benefits both the complaining student and future students.

About This Manual

This manual outlines the existing policies and procedures that guide Bureau staff in completing their duties in an effective, efficient and consistent manner.

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**ADMINISTRATIVE
UNIT
PROCEDURES**

Title: Posting to Facebook and Twitter Procedures	Supersedes: 2013-0001 February 18, 2013	Procedure #: 2013-0001
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure information posted to Facebook and Twitter are in accordance with Department of Consumer Affairs (DCA) policy and State requirements. To insure that information posted to Facebook and Twitter is appropriate and accurate.

Purpose: This procedure outlines the process for posting to the Bureau's Facebook and Twitter accounts.

Definitions:

Outreach analyst – The Bureau analyst charged with the responsibility of ensuring the web site is up-to-date and accurate at all times.

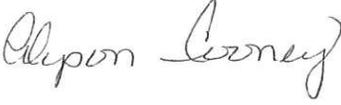
Preapproved postings – Items that have previously been approved for posting to Facebook and/or Twitter and have been approved for future posting without re-approval.

Productivity Benchmarks: The total time spent by the Outreach analyst on this task will vary greatly depending on the number of posts each month. A typical post will take no more than a total of 30 minutes.

Procedures for Posting to Facebook or Twitter:

1. All requests to post to Facebook or Twitter shall be approved by the Chief of the unit responsible for the information.
2. Staff shall submit their request via email to their supervisor for approval. If approved, the supervisor shall forward the request to the Chief for final approval.

3. If approved, the Chief will forward the request to the Administration Unit, Outreach analyst.
4. If the request is general in nature and requires posting on a regular basis, the Outreach analyst will request preapproval from the Administration Unit manager so that approval is not required each time the information needs to be posted.
5. The Outreach analyst will review the request and if he/she has any concerns, comments, or questions, will work with the requestor to resolve.
6. The Outreach analyst will ensure the request is written in the appropriate manner, i.e., includes # where applicable.
7. The Outreach analyst shall submit the documentation regarding the change(s) to the Administration Unit manager for approval.
8. Upon approval, the Outreach analyst will post the information to Facebook and/or Twitter.
9. If the post is marked urgent, the Outreach analyst will ensure the post is up immediately following approval.
10. The Outreach analyst will notify the requestor that the request information has been posted to Facebook and/or Twitter.

Title: Student Tuition Recovery Fund Assessment Reporting Form Procedures	Supersedes: 2013-0033 May 3, 2013	Procedure #: 2014-0033
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Student Tuition Recovery Fund (STRF) is funded by a mandatory fee imposed by the State in accordance with the California Education Code. Qualified California students are subject to a STRF fee and subsequently may be eligible for a reimbursement through STRF should their school close prior to their graduation.

Purpose: The STRF fund exists to relieve or mitigate economic losses suffered by a qualifying student in a qualifying educational program in accordance with California Education Code §94837.

Definitions: N/A

Productivity Benchmarks: The Bureau fiscal analyst may spend up to a total of two days (16 hours) per quarter researching, making telephone calls and reviewing STRF Assessment Reporting Forms received from private postsecondary schools.

Procedures for Processing the STRF Assessment Reporting Form:

1. STRF Assessment Reporting Forms (Form/STRF-7/10) are submitted by each school on a quarterly basis. The completed forms are received in the mail and provided to the fiscal analyst for processing.
2. The fiscal analyst shall review each form received for completeness and accuracy.
3. The fiscal analyst shall ensure that lines A through F have been completed. A blank line is not acceptable in place of a zero. The form must be signed and dated.

4. If the form has a deficiency, the fiscal analyst shall work with the school in an attempt to correct the deficiency at the lowest possible level.
5. Deficiencies are corrected as follows:
 - Incorrect calculation(s) – contact the school and identify the error. Explain the correct way to calculate the information. Instruct them to correct the error and resubmit their form. Refer them to California Code of Regulations (CCR) §76130 for the applicable citation regarding assessment submissions.
 - Blank(s) instead of zero(s) - contact the school and identify the error. Explain the correct way to calculate the information. Instruct them to correct the error and resubmit their form. Refer them to CCR §76130 for the applicable citation regarding assessment submissions.
 - Signature and/or date omitted – contact the school and identify the error. Instruct them to sign, date, and resubmit their form. Refer them to CCR §76130(c) (7) for the applicable citation regarding assessment submissions.
 - Line A and B do not match – this can only happen in the rare instance that students are enrolled in distance education and are not considered California residents OR student charges are paid 100% by a third party. If line A and B do not match, then the school shall be contacted to ensure they have correctly entered the information. If the form was submitted in error, then instruct them to correct the error and resubmit their form. Refer them to CCR §76130 for the applicable citation regarding assessment submissions.
 - After three or more unsuccessful attempts to coach schools on the correct submission of information, the school may be referred to the Enforcement Unit for appropriate action.
6. Completed STRF Assessment Reporting Forms are filed in numeric order by the school code with the most recent form on top. The filing cabinet utilized for these forms is in the Administration Unit.

Title: Student Tuition Recovery Fund Procedures	Supersedes: 2013-0034 October 28, 2014	Procedure #: 2013-0034
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 10
Issue Date: March 12, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Student Tuition Recovery Fund (STRF) is funded by a mandatory fee imposed by the State. Students who are California residents, or enrolled in a residency program, are subject to the fee and subsequently may be eligible to make a claim for tuition recovery from STRF should their school cease operations prior to their graduation.

Purpose: This procedure outlines the steps for processing a STRF claim from inception to completion within 90 days in accordance with the goal established by the Bureau for Private Postsecondary Education (Bureau)

Definitions:

SAIL – Acronym standing for Schools Automated Information Link. SAIL is the Bureau’s database that contains information on California private postsecondary schools.

Eligible student – A student must attend a qualifying school. A qualifying school is either licensed by the Bureau or exempt from licensure because the school is regionally accredited.

California resident – A student is considered a resident if they execute their enrollment agreement with residing in the State of California.

Residency program – A student is enrolled in an educational program and some portion of their instructions occurs in the physical presence of the instructor in the same location.

Prepaid tuition – Evidence of tuition prepaid by the student.

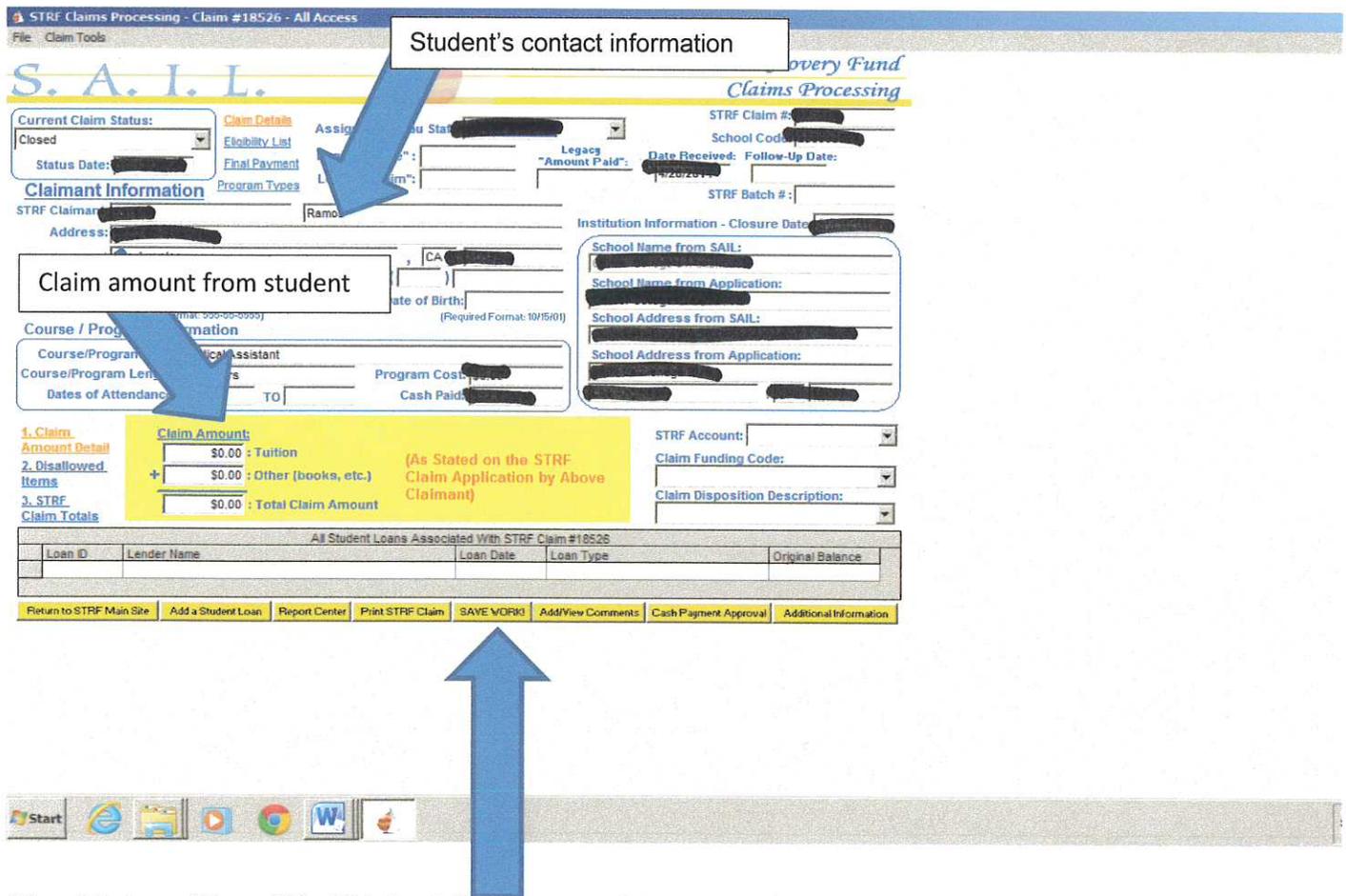
Assessment – The STRF fee submitted to the Bureau by the school on behalf of the student.

Economic loss – Proof that the student suffered an economic loss due to their school closing prior to receiving the education they contracted and paid for.

Productivity Benchmarks: Upon receipt of a complete STRF claim, processing and issuing reimbursement shall take no more than 90 days.

Procedures for Processing a STRF Claim:

1. The STRF claim is received from the student. A copy of the claim form can be found following this path: [\[REDACTED\]](#)
2. The Office Technician responsible for opening the mail will date stamp the claim form and compile the received documents and secure with a binder clip.
3. The Office Technician will log into SAIL to determine if this is a new claim based on the social security number of the claimant. If the claim has previously been logged into SAIL, the Office Technician will pull the existing STRF file. The Office Technician will provide all of the documents to the STRF analyst.
4. If this is a new claim, the Office Technician will enter the new claim into the SAIL database. To do so, he/she will need to identify the school code by conducting a search by entering the school's name in the search line on the main SAIL screen. The school code is then entered on the claim form in the "Office Use Only" box at the top right corner of the application.
5. Log into SAIL and click on "STRF" located on the left side of the screen towards the bottom of the blue box.
6. Click on "Add a New Claim" located in the center of the screen.
7. Fill in the box with the school code, date received (use the date stamped on the application), the STRF analyst assigned the claim, the first and last name of the claimant, claimant's social security number, name of the program enrolled, and then click "Submit" button. If the student did not list a social security number, 999-99-9999 may be used. An individual tax identification number may also be used instead of a social security number; however it will have to be entered in the same format as a social security number. Click "Submit."
8. The screen now in front of you will be used throughout the processing of the student's claim. Type in all of the student's contact information.
9. Type in the claim amount the student is requesting.



10. Click on "Save Work" tab at the bottom of the screen.
11. Click on the "File →" on the menu bar.
12. Place the STRF claim in a green file folder and create a label containing the claim number, student's last name, first name, middle initial, date received, and name of the school. Place the label on the tab at the top of the file.
13. The Office Technician will then deliver the entire file to the STRF analyst. The process to this point shall be completed the same day the STRF claim is received.
14. Within two working days, the STRF analyst will conduct an initial review to ensure the claim form is completed correctly and all of the necessary documents are included. The initial review will be to determine:
 - The application contains a signature.
 - Receipts for tuition and equipment are included.
 - Enrollment Agreement is included.

- Loan information including payments made and a statement from the loan company regarding the current status of the loan.
 - Credit card statements indicating credits and debits related to payments made.
 - Proof of training documents (cosmetology schools only).
15. If the application is complete, skip to #22 below.
 16. If the application is incomplete an initial acknowledgement letter is sent to the student to inform him/her their claim has been received; however it is missing pertinent information. The letter itemizes the information needed. To generate the letter go to the SAIL main screen and click "STRF" located on the left side of the screen towards the bottom of the blue box.
 17. On the far left side of the screen put the STRF claim number in the box labeled "Box #1" and click "Go."
 - Click the tab at the far right bottom of the screen labeled "Additional Information."
 - A box will pop up that lists the documents that must be submitted to validate the claim. Click the items that are missing from the claim.
 - Click "Save."
 - Return to the STRF screen that contains the student's information and click the tab labeled "Report Center" at the bottom of the page.
 - On the left side of the screen click the "Acknowledgement Letter" and then click "Acknowledgement Letter – Additional Information Request."
 - Click "Print" to generate the letter.
 - Place a copy of the letter in the green file folder.
 - This letter shall be mailed to the student within five working days of receiving the claim.
 18. Return to the SAIL screen that contains the student's STRF information. In the drop down box at the top left of the screen choose "Waiting for Response."
 19. Place the entire green file folder in the lateral file cabinet in the STRF area. It shall be placed in the drawer labeled "Waiting for Documents" and filed by STRF claim number.
 20. On or about the first and 15th working day of each month the STRF analyst shall review the claims in the "Waiting for Documents" drawer and if it has been 15 days since the letter requesting information/document was sent, he/she will prepare and mail a second request letter. The STRF analyst shall also attempt to reach the student by telephone and e-mail to make every effort to ensure they are receiving the information. A copy of the second request letter is placed in the green file folder. If after another 15 days there has been no response from the student, the STRF will make a final attempt to contact the student by phone and e-mail. If unsuccessful, the STRF claim will be considered abandon and closed. Proceed to #63 below.

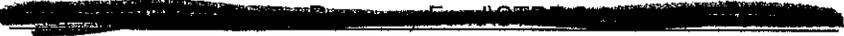
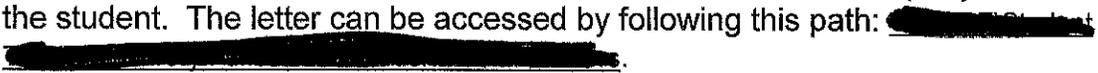
21. Upon receipt of the additional information, the STRF analyst will compile the documents into the file folder. Proceed to #24 below.
22. If the application is complete and contains all of the necessary documents an initial acknowledgement letter is sent to the student to inform him/her their claim has been receive and is under review. To generate the letter go to the SAIL main screen and click "STRF" located on the left side of the screen towards the bottom of the blue box.
23. On the far left side of this screen put the STRF claim number in the box labeled "Box #1" and click "Go."
 - At the bottom of this screen click the tab labeled "Report Center."
 - On the left side of the screen click the box labeled "Acknowledgement Letter."
 - Click "Print" to generate the letter.
 - Place a copy of the letter in the green file folder.
 - This letter shall be mailed to the student within five working days of receiving the claim or additional documents missing from a previously submitted claim.
24. Upon the claim being deemed complete i.e., all of the required documents have been received, the claim will be assigned to a STRF analyst by the STRF lead analyst.
25. Using the STRF claim number, the STRF analyst will go to the STRF claim in SAIL and put his/her name in the box labeled "Bureau Assigned Staff" located at the top of the screen.
26. Within two working days of being assigned a claim, the STRF analyst will complete an initial analysis to determine if the claim is eligible for reimbursement. The STRF analyst will access the file in SAIL, and determine the following:
 - Was the school a qualifying school at the time the student attended? If yes:
 - Is the school closed? If yes:
 - Is the claim submission date two years or less from the school closure date for students that were notified of the closure OR four year if the student was not notified: If yes:
 - Is the school closed? If yes:

If No to any of the above, the student is not eligible to file a STRF claim, proceed to #63 below.

27. The STRF analyst shall determine if the student suffered an economic loss due to the any of following:
 - a. Closure of the school.
 - b. The school's failure to pay refunds or charges on behalf of a student to a third party for fees, equipment, or other qualifying commitments.
 - c. The school's failure to pay or reimburse loan proceeds under a federally guaranteed student loan program.

- STRF Claim number
- Number of checks(s)
- Student's social security number
- School name
- Check amount

The form will automatically calculate the total at the bottom of the page.

51. Create a letter to the student advising them that their claim has been approved and the amount they can expect to receive. Prepare this letter for the Deputy Bureau Chief's signature. The template for this letter can be found by following this path: 
52. Gather the STRF files ready to be paid. Paper clip the letter to the State Controller (#48 above) and letter to the student (#51 above) on the top of each STRF file. Bundle the files together and place the Special Handling Form (#49 above) on top. Give to the Deputy Bureau Chief for signature.
53. Upon receipt of the documents from #52, the Office Technician will prepare the documents for mailing.
54. Make a copy of the student approval letter. Place the copy in the student's STRF file folder. Mail the original to the student.
55. Make two copies of the SCO letter. The original and one copy are attached to the Special Handling Form for submission to the Department of Consumer Affairs (DCA), Accounting Office. Forward the documents to DCA.
56. Place the second copy of the SCO letter in the student's STRF file folder.
57. Place the entire STRF file in lateral file cabinet in the STRF area. It shall be placed in the drawer labeled "Pending SCO."
58. Upon receipt of the checks from SCO, make a copy of each check and place the copy in the student's STRF file folder.
59. Prepare a certified mail card for each check to be mailed. Place the certified mail receipt in the student's STRF file folder.
60. Create a letter for the Deputy Bureau Chief's signature to accompany the letter to the student. The letter can be accessed by following this path: 
61. Mail the letter and check by certified mail to the student (or lender if applicable).
62. Return to the student's claim information in SAIL. In the drop down box at the top left of the screen choose "Closed."

63. If a claim is denied, deemed ineligible or abandon (the student fails to respond to requests for documents) the STRF analyst shall complete a Summary. The Summary can be accessed by following this path: [REDACTED]
[REDACTED]
Place the completed Summary in the student's STRF file folder.
64. The STRF analyst will need to update SAIL.
65. All items claimed by the student must be entered in SAIL. Go to SAIL and enter the STRF claim number to access the student's claim information page. At the far left click "Disallowed Items." Enter all of the items the student requested be reimbursed and the amounts. The amount in this section should equal the amount entered as in the "Claim Amount Detail."
66. Verify the balance shows as \$0. If not, an adjustment is needed in either the "Disallowed Items" or "Claim Amount Detail."
67. On this same SAIL screen go to the drop down box at the top left of the screen choose either "Denied" or "Ineligible" or "Unable to Contact" depending on the case.
68. At the bottom of the screen select the tab that says "Print STRF Claim." Attach the copy of the claim to the inside front cover of the student's STRF file.
69. Stamp the outside of the folder "DENIED" or "Ineligible" or Unable to Contact" stamp the outside of the folder. Also, stamp with the "Date Processed" stamp and initial and date the file folder.
70. Prepare a letter for the Deputy Bureau Chief's signature to the student informing them of the denial of their claim. The template for the letter can be found by following this path [REDACTED]
71. Place the completed file in the main STRF file area.
72. On or about the first and 15th working day of each month, the lead STRF analyst will print an Active STRF Claims report. He/she will monitor on an ongoing basis the status of each pending claim. If a pending claim has not had any activity from one report to the next (approximately 15 days) the lead STRF analyst will follow up with the analyst assigned the claim to ensure the claim continues on track for a 90 day completion.



Bureau for Private Postsecondary Education Procedure

Title: Office Supply Ordering and Maintenance Procedures	Supersedes: 2013-0059 February 26, 2013	Procedure #: 2013-0059
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 4
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that all Bureau for Private Postsecondary Education (Bureau) office supplies are ordered and maintained in accordance with Department of Consumer Affairs' (DCA) policy and State mandated requirements.

Purpose: This procedure outlines the office supply ordering and maintenance process.

Definitions:

Cal-Card – A State issued credit card intended for routine purchases such as office supplies.

Purchase Requisition – The document requesting approval of the DCA Purchasing Unit to order certain items.

Productivity Benchmarks: The process for placing office supply orders and maintaining the office supply inventory will take approximately 24 hours per month. If an inordinate amount of research time is necessary to locate an item or an extraordinary monthly order is necessary due to an unanticipated project, the amount of time spent could increase on a case-by-case basis.

Office Supply Ordering and Maintenance Procedures:

1. Supply ordering and maintenance are the responsibility of the Administrative Unit Office Technician.

2. An initial allotment of supplies will be provided to a new employee by the Administrative Unit Office Technician as part of the initial hiring procedures. The list of supplies each new employee will receive are as follows:
 - 1 trash can
 - 1 recycle bin
 - 1 "IN" basket
 - 1 small dry erase board for outside of cubicle
 - 2 rolls invisible tape
 - 1 tape dispenser
 - 1 box of staples
 - 1 stapler
 - 1 staple remover
 - 1 box small paper clips
 - 1 box large paper clips
 - 1 box each binder clips small/medium/large
 - 1 paper clip dispenser
 - 1 glue stick
 - 1 or 2 each Post-Notes: 1.5x2 3x3 3x5 4x6
 - 2 packages Post-it Flags in red, blue, and yellow or other 3 color combination
 - 1 letter size writing pad
 - 1 steno pad
 - 2 black pens
 - 2 blue pens
 - 1 red pen
 - 2 mechanical pencils
 - 2 regular #2 pencils
 - Highlighters, assorted colors
 - 1 correction tape
 - 1 pair of scissors
 - 1 ruler, 12"
 - 1 mouse pad
 - 1 sheet of panel wall clips
 - 50 panel fabric T-pins
 - 3 monitor wipes
 - 1 badge holder w/accessories
3. When an employee identifies a need for supplies, he/she shall complete a Supply Request Form. The form can be accessed as follows: [REDACTED]
[REDACTED]. Upon completion the requestor forwards the form to his/her manager for approval and submission to the Administration Unit for processing.
4. The manager will review the request and if deemed appropriate, will forward it to the Administration Unit Office Technician.

5. The Administration Unit Office Technician will proceed to fill the request with supplies from Bureau inventory, or ensure an order is processed for the requested supplies if unavailable through the Bureau's inventory.
6. Upon completing the request, the Administration Unit Office Technician will place the completed Supply Request Form in the appropriate binder by fiscal year located at his/her desk. Binders shall be retained for three fiscal years.
7. Office supplies can be purchased using the State-issued Cal-Card or through a Purchase Requisition following the State and Department purchasing policies and guidelines. Cal-Cards are assigned to the Office Technician and his/her back-up for the purpose of purchasing office supplies.
8. All Bureau office supplies are located in the secure supply room. Access can only be granted through a manager. Rank and file staff shall be accompanied by a manager when accessing the supply room.
9. An office supply inventory will be performed quarterly in January, April, July, and October. An inventory count sheet can be accessed by following: [\[REDACTED\]](#)
[\[REDACTED\]](#)
10. Upon completing of the quarterly inventory, the Administration Unit Office Technician will place the completed count sheet in the appropriate binder by fiscal year located at his/her desk. Binders shall be retained for three fiscal years.
11. Section managers removing standard office supplies from the secure room will itemize on a Supply Room Out-Take Form those items removed from inventory. The manager shall include on the form the date, unit, their name, and their signature, and then turn it into the Administration Unit Office Technician. The Supply Room Out-Take Forms can be obtained from the Administration Unit Office Technician or there is a supply located in the secure supply room in a clearly marked folder.
12. The Administration Unit Office Technician shall maintain the Supply Request Forms in the appropriate binder by fiscal year located at his/her desk. Binders shall be maintained for the current fiscal year.
13. The purchase of office supplies or minor office equipment that are not part of the pre-approved general or section specific inventories will require a justification and approval from a Chief prior to purchase.
14. Approved special request office supply orders for projects or critical due date tasks will be placed as needed with the approval of the applicable Unit Chief.
15. A general office supply order will be placed at least once per month. The completed purchase order shall be maintained in a binder at the Office Technician's desk awaiting the receipt of the order. Upon receipt of an office

supply order, the Administration Unit Office Technician shall be responsible for determining if the order is received correctly and completely. Once the order is received, the purchase order shall be compared to the packing slip AND the items received. If there are any discrepancies, the Office Technician shall research the problem and consult the Administration Unit Manager for direction on how to proceed. The purchase order, invoice and packing slip shall be maintained in by fiscal year for three fiscal years.

Title: Front Counter Protocol Procedures	Supersedes: 2013-0062 October 24, 2012	Procedure #: 2013-0062
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure guests to the Bureau for Private Postsecondary (Bureau) are provided excellent customer service and that the responsibilities assigned to the front counter Office Technician are completed effectively and efficiently and in accordance with Department of Consumer Affairs (DCA) policy and State mandated requirements.

Purpose: This procedure guides the Office Technician on the appropriate protocol for assisting visitors at the front counter.

Definitions: N/A

Productivity Benchmarks: The Office Technician responsible for assisting visitors to the front counter shall be available at all times between 8:00 a.m. and 5:00 p.m., Monday through Friday, excluding State holidays.

Procedures for Greeting Visitors to the Bureau at the Front Counter:

1. An Office Technician is assigned to assist visitors to the front counter.
2. As first point of contact when greeting visitors to the Bureau, the Office Technician's demeanor will leave a lasting impression on the visitor. In concert with the expectations of the California public as well as the DCA Strategic Plan, the Office Technician shall maintain a professional, respectful and helpful demeanor at all times.
3. Although the Bureau does not maintain a dress code, in accordance with the Bureau's Staff Expectations & Office Guidelines, the Office Technician shall wear

attire appropriate for the responsibility of greeting visitors in a professional office setting. The Office Technician shall present a neat, clean, and professional appearance at all times.

4. The front counter shall be kept neat and tidy at all times.
5. Visitors to the front counter shall not be permitted to enter the office unless they have a scheduled appointment with a Bureau employee.
6. The Office Technician shall direct the visitor to have a seat in the lobby area and then he/she shall notify the Bureau staff person that their guest has arrived for their appointment. The Bureau staff person will then escort the visitor to the meeting site. Only if directed by an analyst or manager should the Office Technician allow the visitor into the office
7. The visitor shall not be left unattended at any time.
8. If a visitor comes to the front counter that does not have an appointment, but wishes to see a Bureau staff person, the Office Technician shall ascertain their name and the nature of their business and then ask them to have a seat in the lobby area. The Office Technician shall call the appropriate analyst/manager to assist the visitor.
9. To ensure professional and customer service oriented service, Bureau staff shall notify the receptionist of expected visitors such as interviewees or meeting participants. For employee safety and confidentiality, all visitors to the suite shall be escorted by a Bureau employee at all times.

Title: Safeguarding Money Procedures	Supersedes: 2013-0063 June 23, 2014	Procedure #: 2013-0063
Procedure Owner: Administration Unit	Effective: July 15, 2013	Pages: 2
Issue Date: March 25, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that money received through the mail is handled in accordance with the State Administrative Manual and Department of Consumer Affairs (DCA) policy.

Purpose: This procedure outlines the Bureau's fiduciary responsibility to safeguard the State's money.

Definitions:

Safeguarding money – Measures taken to mitigate or prevent fiscal losses.

Productivity Benchmarks: See Procedure # 2013-0064, Mail Processing. The benchmark for this procedure is encompassed within the mail processing benchmark.

Safeguarding Money Procedures:

1. Checks received through the mail are to be processed each day according to Procedure # 2013-064, Mail Processing Procedures.
2. Individuals coming to the front counter wishing to pay fees shall be referred to the DCA Cashiering Unit, 1625 North Market Street, Sacramento.
3. At the beginning of each workday the cashiering basket shall be retrieved from the locked cabinet by the Administration Unit manager or his/her designee and provided to the Office Technician responsible for cashiering.
4. Anytime the Office Technician is away from his/her desk, all checks and documents related to cashiering shall be locked in a secure cabinet at his/her desk.



Bureau for Private Postsecondary Education Procedure

Title: Mail Processing Procedures	Supersedes: 2013-0064 July 15, 2013	Procedure #: 2013-0064
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 6
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Administration Unit is responsible for processing all incoming mail received from various governmental and private carriers in accordance with the State Administrative Manual and Department of Consumer Affairs' (DCA) policy.

Purpose: This procedure will educate staff on how incoming mail shall be received, sorted and delivered to the intended recipient.

Definitions: N/A

Productivity Benchmarks: The time spent performing this task will vary depending on volume of mail received each day. Variables include such things as final filing dates for recruitments, annual fee deadlines, etc. On average, an Office Technician fully trained in processing Bureau for Private Postsecondary Education (Bureau) mail is expected to spend one to two hours per day performing this task.

Procedures for Processing the Daily Mail:

An Office Technician assigned to the Administration Unit shall be responsible for processing all Bureau mail. Incoming mail shall be processed as follows:

1. Open all mail **not** marked "Personal" or "Confidential" and date stamp the contents.
2. If applicable, ensure mail has a school code.
3. Retain and attach envelopes for enforcement, licensing and annual fees related mail.

- p. Place the original application and a copy of the check(s) in the Licensing Section mail bin.

If an application is received with a check that is not in the correct amount proceed as follows:

- a. Print a copy of the Return Check Log found by accessing the following path:
[REDACTED]
- b. Fill in the information for each check received that day that was not in the correct amount.
- c. Make a copy of the return check log for Bureau files.
- d. Place the original log on top of the applications and checks in the order they are documented on the log and give to the fiscal analyst for processing.
- e. The fiscal analyst will conduct further research with Licensing Section staff to determine if the fee should be cashiered and the application processed or the package returned.
- f. If the fiscal analyst determines the fee is to be cashiered, the application package will be returned to the Office Technician for appropriate processing.
- g. If the fiscal analyst determines the fee is to be returned, he/she will prepare a "Return Payment Notice" and return the entire package to the Office Technician. The Office Technician will prepare the documents for return to the sender and update the Returned Check Log accordingly.
- h. The original copy of the updated Return Check Log will replace the copy in the Bureau file.

If an application is received without a check, but a check should have been included, proceed as follows:

- a. Stamp the right corner of the application as "No Fee Enclosed."
- b. Forward the application to the Licensing Unit.

If a check is received without an application, proceed as follows:

- a. Record the check on the Return Check Log.
- b. Follow the same procedures as outlined above. The fiscal analyst will prepare a "Return Payment Notice" and return the check to the sender.

7. Billing notices shall be processed as follows:

If a check is received in the correct amount, send the original billing and check to the DCA Cashiering Unit following the same steps described above.

If a check is not received, proceed as follows:

- a. Stamp "No Fee Enclosed" at the top of the billing.
- b. No copies of the billing are necessary.
- c. The billing is not logged.
- d. If the billing is for STRF, place the original billing in the money bag along with the checks for deposit.
- e. If the billing is for an Annual Fee, forward the billing to the fiscal analyst for data entry in SAIL.

If a billing notice is received with a check that is not in the correct amount, forward the billing notice and check to the fiscal analyst for further follow-up.

8. General correspondence shall be processed as follows:
 - a. Date stamp the documents on the front in an area that does not interfere with the contents of the correspondence.
 - b. If an envelope is returned to the Bureau due to being undeliverable as addressed, date stamp the envelope. Open the envelope and distribute as follows:
 - Licensing related – Place in the licensing mail bin located in the main reception area for pick-up by licensing staff.
 - STRF related – Deliver to the STRF claims analyst.
 - Billing related – Deliver to the fiscal analyst
 - Enforcement related – Place in the Enforcement Section’s mail basket located on the counter in the mail station.
 - Other mail – Deliver to the Administrative Unit lead analyst.
 - c. Distribute correspondence as follows:
 - Licensing related – Place in the mail bin located in the main reception area for pick-up by licensing staff.
 - Enforcement related – Place in the Enforcement Section’s mail basket located on the counter in the mail station.
 - Addressed to a manager - Delivered to the respective Bureau manager.
 - Administrative related – Deliver to the respective technician or analyst.
 - Recipient cannot be determined – Deliver to the Administrative Unit lead analyst.
 - Junk mail - Place in the recycle bins or regular trash as appropriate.
 - d. Distribute mail identified as “Personal” and/or “Confidential” as follows:
 - DO NOT OPEN.
 - Date stamp the envelope and distribute to the intended recipient.
 - e. Distribute cashiered documents as follows:
 - Mail received from the DCA cashiering courier is to be stamped using the round date stamp “Received from Cashiering.”
 - Transaction Reports and related documents are to be delivered to the fiscal analyst.
 - Applications and billings are distributed to the addressee or appropriate recipient.

EXHIBIT A

Guidelines on Use of the Date Guaranteed, Amount Guaranteed, and Signature Guaranteed Stamp

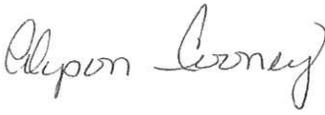
Review all checks received to ensure they have been properly endorsed and executed as follows:

- The check has a current date.
 - ✓ If blank, use the "Date Guarantee" stamp.
- The Bureau for Private Postsecondary Education is listed on the "Pay to the Order of" line.
 - ✓ If blank, use the "Bureau for Private Postsecondary Education" stamp.
- The numerical amount matches the written amount.
 - ✓ If blank, use the "Amount Guarantee" stamp.
 - ✓ Only one amount can be stamped "Amount Guaranteed". If both amounts are missing, the check must be returned.
- The written amount matches the numerical amount.
 - ✓ If blank, use the "Amount Guarantee" stamp.
 - ✓ Only one amount can be stamped "Amount Guaranteed". If both amounts are missing, the check must be returned.
- The check is signed.
 - ✓ If blank, use the "Signature Guarantee" stamp.
- The check is drawn on a United States bank and is in United States funds/dollars.

EXHIBIT B

[REDACTED] ENDORSEMENT STAMP EXEMPLAR:

**PAY TO THE ORDER OF
[REDACTED] BANK OF AMERICA [REDACTED]
FOR DEPOSIT ONLY
ACCOUNT [REDACTED]
CAL STATE TREASURER
DEPARTMENT OF CONSUMER AFFAIRS
ABSENCE OF PRIOR ENDORSEMENT GUARANTEED**

Title: Revenue Refund Procedures	Supersedes: 2013-0066 July 16, 2013	Procedure #: 2013-0066
Procedure Owner: Administration Unit	Effective: July 16, 2013	Pages: 4
Issue Date: March 26, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that refunds due a school are processed in accordance with the State Administrative Manual and Department of Consumer Affairs (DCA) policy.

Purpose: This procedure outlines the process for issuing refunds.

Definitions:

Revenue – Money received in the course of conducting business.

Refund – Money returned to a payer usually resulting from an overpayment.

SAIL – an acronym for Schools Automated Information Link. SAIL is a data base that stores information on private postsecondary schools operating in California.

Productivity Benchmarks: Each refund processed shall take 15 to 30 minutes to process.

Procedures for Issuing a Refund:

1. Gather all of the relevant documentation regarding the refund.
2. The Bureau fiscal analyst shall log into SAIL.
3. Enter the school’s code in the box titled “School Code” at the top of the screen and click on “Go.”
4. Click on the “Revenue Tracking” tab located towards the bottom right of the screen. Determine the invoice that is associated with the refund and notate the

transaction number. The transaction number can be located in the second to last column titled "Trans No."

- Return to the Main Menu and click on "Revenue Tracking" found on the left side of the screen, fifth item down in the flue box.
- Insert the transaction number in the box at the top left of the screen titled "Enter Transaction #" and click "Go."
- Go to the top of the page and click "Revenue Tools" (reference Table 1). In the drop down box select "Print Revenue Request."

Table 1:

Transaction [redacted] Ledger # [redacted] Batch # [redacted] Date Check Received [redacted]
Check Logged to [redacted] Check Cash Check Logged to SAIL [redacted]

Check From: Selling School Other School Check [redacted]
Check # [redacted] Check Amount \$ [redacted]
Date Check Delivered [redacted]

State Payable To: Bureau For Private Postsecondary Education (BPPPE)
Amount Allocated to the STMF Fund [redacted]
Amount Allocated to the STMF Fund [redacted]

Transaction Balanced - 1 Invoice(s) for \$801.71

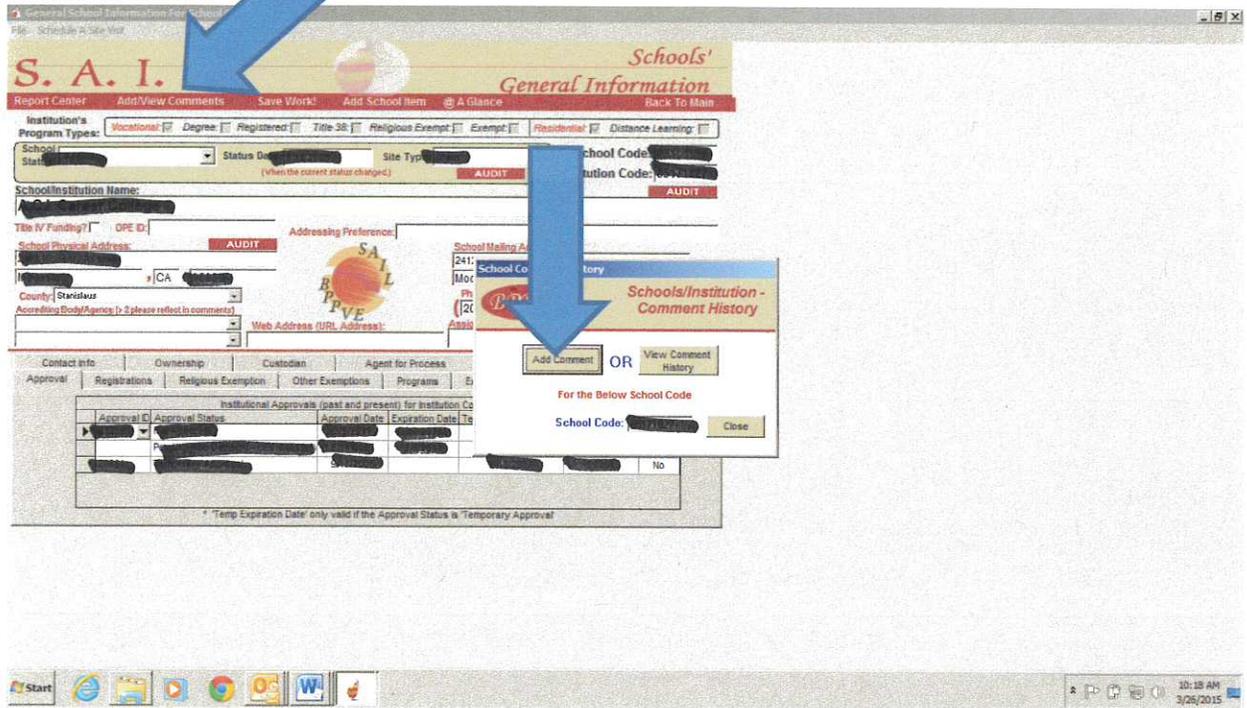
Invoice Date	Line Amount	School/Person Name (if different address)	AP Month	AP Year	STMF Quarter	STMF Year
[redacted]	[redacted]	[redacted]	September	2014		

Buttons: Back To Main, Save Work!, Report Cancel, Add View Comments, Add New Transaction, Print Transaction Set!

- Retrieve the printed document.
- In Section 1 of the form check the applicable box for the reason for the refund and enter the pertinent details.
- In Section 2 of the form enter the amount of the refund.
- In Section 3 of the form verify the preprinted address is the address the school wishes the refund to be sent. If not, enter the alternate recipient's address.
- In Section 4 of the form the Bureau fiscal analyst shall sign and date the form.
- The form and supporting documentation shall be submitted to the Administration Unit manager for approval. The manager shall sign and date the form in Section 5. Upon approval, the manager shall return the package to the Bureau fiscal analyst.
- The Bureau fiscal analyst shall log into SAIL.

15. Enter the school's code in the box titled "School Code" at the top of the screen and click on "Go."
16. At the top of the school's information page click on "Add/View Comments" then click "Add Comment" in the box that pops up. (Table 2).

Table 2:



17. SAIL will automatically add the refund request information generated from the Revenue Request Form; however, the Bureau fiscal analyst shall add an additional comment indicating the reason for the refund.
18. The Bureau fiscal analyst shall record the refund on the current year's Refund Tracking Sheet. This form can be accessed by following this path: C:\BPPE\BPPE ADMINISTRATIVE SUPPORT\z_jessica Liu\Refunds\. Next click BPPE Refunds Tracking FY. Choose the folder titled Refunds Tracking FY for the current fiscal year and enter the relevant information*. Print two copies and then save and exit the spreadsheet.
19. Make a copy of the Revenue Tracking-Refund Request form created in numbers six through 12 above.
20. Assemble two separate packets as follows:
 - a. The original Revenue Tracking-Refund Request form attached to the spreadsheet.
 - b. The copy of the Revenue Tracking-Refund Request form attached to a copy of the spreadsheet. Also attach copies of any supporting documentation.

21. Forward package "a" to the DCA Cashiering Unit for processing.
 22. File package "b" in the Bureau's fiscal analyst's file drawer.
 23. Upon completion of the transaction, the DCA Cashiering Unit will return the Revenue Tracking-Refund Request form. The form will indicate that the transaction has been processed and the date processed.
 24. Upon receipt of the completed Revenue Tracking-Refund Request from the Cashiering Unit, update the spreadsheet to indicated the date the refund was processed. Make a copy of the spreadsheet.
 25. Attach the updated copy of the spreadsheet and the completed Revenue Tracking-Refund Request to the package filed in number 21 above.
- * If more than one refund is being processed, up to 12 refunds may be added to the same spreadsheet.**

Title: Public Records Act Request Procedures	Supersedes: 2013-0067 July 19, 2013	Procedure #: 2013-0067
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 3
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that all Public Records Act (PRA) requests received by the Bureau for Private Postsecondary Education (Bureau) are processed in accordance with the PRA as defined in Government Code §6250 and Department of Consumer Affairs (DCA) Guidelines. DCA Guidelines can be accessed at:

[http://www.dca.ca.gov/...](#)

Purpose: This procedure outlines the process for handling PRA requests.

Definitions:

Public records - any writing owned, used or maintained by DCA in the conduct of its official business. Writings include information recorded or stored on paper, computers, email, or audio or visual tapes.

Public Records Act – Any member of the public can request to view or have copies made of public documents maintained by DCA. This is in accordance with the Public Records Act.

Productivity Benchmarks: Depending on the accessibility and volume of documents requested, a request may take from two hours to three days (24 hours) to complete.

Procedures for Processing Public Record Act Requests:

1. Requests for inspection or copying of public records may be made verbally or in writing. If the request is made verbally, staff shall ask the requestor to put it in writing, but if he/she refuses the PRA analyst shall confirm the request with the requestor in writing.
2. Upon receipt of a written PRA, the document shall be date stamped.

3. The request shall immediately be logged on the PRA Request Log. The log can be accessed at: ~~C:\DPR\ADMINISTRATIVE SUPPORT\PRA~~
~~Request Log (Autosaved)~~
4. The PRA analyst shall immediately assess the request to determine the estimated length of time the request will take and prioritize his/her workload accordingly. Because PRA requests are time sensitive, they are a top priority.
5. Determine if the information being requested is available. If so, determine if it can be released. For example, certain enforcement information, by law, cannot be released. Review the documents for personal information that cannot be released, i.e., social security numbers, telephone numbers, home addresses, financial information, etc. Such information shall be redacted using a thick black marker.
6. A PRA request must be responded to within 10 days of receipt. If possible, the requested documents will be provided to the requestor within the 10 day timeframe. If that is not possible, a request for additional information, a request for applicable fees, or denial of the PRA request will be sent within the 10 day timeframe. If the PRA analyst does not feel he/she can meet the 10 day response requirement, then he/she shall immediately inform the Administration Unit manager and ask for direction.
7. If an unusual circumstance exists that makes it impossible for the Bureau to provide the request within 10 days, the PRA analyst shall ask the Administration Unit manager for approval to extend the response time. The response time can be extended up to 14 calendar days. If approved, the PRA analyst will notify the requestor of the need for additional time. The PRA analyst will inform the requestor when they can expect to receive the requested documents.
8. The Bureau may refuse to disclose any records that are exempt from disclosure. If the PRA analyst is unsure if a document is exempt from disclosure, he/she shall send the DCA PRA attorney an email explaining the request and ask for an opinion.
9. If the request contains documents stored in an electronic format, the Bureau must release the information in compliance with Government Code §6253.9. Refer to DCA PRA Guidelines, page 3, #5.
10. The Bureau may provide the documents to the requestor for a fee authorized by Business and Professions Code §161. Unless the request is especially voluminous (resulting in a fee greater than \$25.00), a fee typically isn't charged. If it is determined that a fee will be charged, the PRA analyst will immediately send the requestor a letter itemizing the fee.
11. Upon submission of the fee, the PRA analyst will immediately process the request. If the fee is not received within 30 calendar days, the request can be marked closed

and filed with the completed PRA requests. The PRA log shall be updated to reflect that the request was closed without action due to nonpayment of fees.

12. When the PRA analyst has completed the request, he/she will attach a cover letter to the request and send it to the requestor. The letter shall identify the specific request and the information being provided. The letter shall be signed by the PRA analyst and include contact information in case the requestor has any questions. A copy of the letter will be maintained in the PRA request file. The PRA Log shall be updated to reflect that the request has been completed.
13. If a PRA request is received from the media, e.g., newspaper, TV station, magazine, etc., the request shall be forwarded to the DCA Public Affairs Office. The Public Affairs Office will provide further direction on responding to the request. Under no circumstance should the PRA analyst respond to a media entity.

Title: Information Practices Act Request Procedures	Supersedes: 2013-0068 July 17, 2013	Procedure #: 2013-0068
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that all Information Practices Act (IPA) requests received by the Bureau for Private Postsecondary Education (Bureau) are processed in accordance with the IPA as defined in Civil Code §1798.

Purpose: This procedure outlines the process for handling IPA requests.

Definitions:

Public Information Act – the law that regulates the collection and use of personal information by state government agencies. The law also details the rights of individuals pertaining to his/her personal information.

Productivity Benchmarks: Depending on the accessibility and volume of documents requested, a request may take from two hours to three days (24 hours) to complete.

Procedures for Processing Public Information Act Requests:

1. Requests for inspection or copying of personal records by the individual the information pertains to may be made verbally or in writing. If the request is made verbally, staff shall ask the requestor to put it in writing, but if he/she refuses the IPA analyst shall confirm the request with the requestor in writing.
2. Upon receipt of a written IPA, the document shall be date stamped.
3. The request shall immediately be logged on the IPA Request Log. The log can be accessed at: [C:\IPR\IPR ADMINISTRATION\IPA Request Log \(A...](#)

4. The IPA analyst shall immediately assess the request to determine the estimated length of time the request will take and prioritize his/her workload accordingly. Although the law does not put a timeframe on responses to IPA requests, they are to be treated as a top priority and responded to within 10 working days. If the IPA analyst does not feel he/she can meet the 10 day response requirement, then he/she shall immediately inform the Administration Unit manager and ask for direction.
5. Determine if the information being requested is available. If so, determine if it can be released. Carefully review the documents for information that cannot be released (personal information of others, enforcement information, etc.). Such information shall be redacted using a thick black marker. If the IPA analyst has a doubt about what information can be disclosed, verify with the Bureau Chief, Deputy Bureau Chief, Chief, or Legal Office.
6. The Bureau may provide the documents to the requestor for a fee authorized by Business and Professions Code §161. Unless the request is especially voluminous (resulting in a fee greater than \$25.00), a fee typically isn't charged. If it is determined that a fee will be charged, the IPA analyst will immediately send the requestor a letter itemizing the fee.
7. Upon submission of the fee, the IPA analyst will immediately process the request. If the fee is not received within 30 calendar days, the request can be marked closed and filed with the completed IPA requests. The IPA log shall be updated to reflect that the request was closed without action due to nonpayment of fees.
8. When the IPA analyst has completed the request, he/she will attach a cover letter to the request and send it to the requestor. The letter shall identify the specific request and the information being provided. The letter shall be signed by the IPA analyst and include contact information in case the requestor has any questions. A copy of the letter will be maintained in the IPA request file. The IPA Log shall be updated to reflect that the request has been completed.

Title: Procedures for Receiving a Subpoena	Supersedes: 2013-0068 July 17, 2013	Procedure #: 2013-0068
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 3
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure subpoenas served on and accepted by Bureau for Private Postsecondary Education (Bureau) staff are in accordance with the law.

Purpose: This procedure outlines the process for accepting subpoenas.

Definitions:

Subpoena - a document requiring a witness to appear and testify at a deposition, hearing, or trial. A subpoena can also be used to request business records.

Server – a person hired to lawfully deliver a subpoena. The Server typically has no knowledge of or interest in the subpoena.

Productivity Benchmarks: The acceptance of a subpoena will take from three to five minutes. The processing of a subpoena for documents may take from two hours to three days (24 hours) depending on the accessibility and volume of documents requested.

Procedures for Receiving a Subpoena:

1. Subpoenas can be delivered by mail, fax, or personal service. Typically, a Server will deliver a subpoena to the Bureau. The analyst assigned to receive subpoenas shall be summoned to the front office to accept the subpoena.
2. The analyst will inspect the subpoena to determine if it being correctly served. If in doubt, the analyst will request the assistance of the Administration Unit manager.

3. The Bureau for Private Postsecondary Education shall appear on the first page of the subpoena. If the subpoena does not cite the Bureau as the intended recipient, **DO NOT ACCEPT THE SUBPOENA.**
4. If the subpoena is address to another Bureau employee, the analyst may not accept the subpoena. The analyst shall summon the employee to the front office to accept the subpoena on their own behalf. If the employee is not available, then his/her manager may sign for the subpoena (if the subpoena is work related). If neither is available, the Server shall be so informed and instructed to return at a later date.
5. When accepting a subpoena, the analyst will be asked to sign an affidavit of services. The affidavit of services indicates that the signer accepted the subpoena (if served by a Server) or assumed responsibility for the subpoena (if faxed or mailed).
6. If the subpoena is served by a Server, it must accompanied by a \$15.00 check made payable to the Bureau.
7. On the upper right hand corner of the subpoena, in pencil, note how the subpoena was served (personally served, faxed, mailed, etc.), the date, time, and initials of the person accepting the subpoena.
8. The request shall immediately be logged on the Subpoena Log. The log can be accessed at: 

9. Scan the subpoena and forward it to the Bureau attorney in the DCA Legal Office.
10. Review the subpoena and determine what is being requested.
11. If the Bureau is being subpoenaed to testify, determine the appropriate unit within the Bureau and make a copy of the subpoena and provide the original to the appropriate Chief for further action.
12. Note the action taken on the copy and file in the Administration Unit files.
13. If the subpoena is for documents, the analyst shall immediately assess the request to determine the estimated length of time the request will take and prioritize his/her workload accordingly. Subpoenas are time sensitive, and therefore a a top priority.
14. Review the information being requested and determine if it can be released. If necessary, consult with the appropriate Chief or the Bureau attorney to determine if the requested documents are being appropriately subpoenaed.
15. If appropriately subpoenaed, determine the cost to reproduce the information in accordance with Business and Professions Code §161. The analyst will

immediately send the requestor a letter itemizing the fee. The fee will include the cost per page (includes time spent copying and redacting information), estimated cost for staff time (hourly rate), and shipping charges.

16. The letter will be sent to the attorney making the request. This may be completed by the Bureau attorney or analyst, depending on the complexity of the request.
17. Upon submission of the fee, the analyst will immediately process the request. If the fee is not received within 30 calendar days, the request can be marked closed and filed with the completed subpoena requests. The Subpoena Log shall be updated to reflect that the subpoena was closed without action due to nonpayment of fees.
18. Determine if the information being requested is available. If so, determine if it can be released. For example, certain enforcement information, by law, cannot be released. Review the documents for personal information that cannot be released, i.e., social security numbers, telephone numbers, home addresses, financial information, etc. Such information shall be redacted using a thick black marker.
19. When the analyst has completed the request, he/she will attach a cover letter to the request and send it to the requestor. The letter shall identify the specific request and the information being provided. The letter shall be signed by the analyst and include contact information in case the requestor has any questions. A copy of the letter will be maintained in the subpoena file. The Subpoena Log shall be updated to reflect that the request has been completed.
20. If the subpoena requires the testimony of Bureau staff, a fee will be determined by the Bureau attorney and provided to the requestor.

Title: Answering Incoming Calls Procedures	Supersedes: 2013-0073 July 19, 2013	Procedure #: 2013-0073
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 5
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that all incoming telephone calls are answered in accordance with Department of Consumer Affairs (DCA) policy (OHR 11-01) and State mandated requirements.

Purpose: This procedure outlines the process for answering, screening and transferring calls coming in on the main telephone line and the 800 line.

Definitions:

Polycom Nortel Phone System – The high-quality, voice over telephone systems utilized by DCA.

Business Services Liaison - The Bureau analyst responsible for interacting with DCA's Business Services Office staff on all business services matters.

Business Services Office – The office within DCA charged with oversight of critical business functions. Such functions include space planning and facilities leasing/management, contracts, purchasing, records management, Cal Card program, centralized mail services, and digital print services.

Hunt group – A method of distributing phone calls from a single telephone number to a group of several phone lines.

Public Affairs Office – The office within DCA charged with responding to media inquiries; creating and executing marketing plans for the Department's various initiatives; and developing consumer education and media campaigns.

Executive Office – The office that houses the DCA directorate.

Consumer Information Center Call Center – The office within DCA staffed with phone agents that provide assistance to consumers and licensees in English and Spanish, and in more than 177 languages with the assistance of Language Line Solutions.

Productivity Benchmarks: The amount of time spent actually answering incoming calls can vary greatly for many reasons; however the Office Technician (Receptionist) responsible for answering the Bureau for Private Postsecondary Education (Bureau) main telephone line and 800 number must be available to answer calls at all times between 8:00 a.m. and 5:00 p.m., Monday through Friday, excluding State holidays.

Procedures for Answering Incoming Calls:

1. The Bureau uses the Polycom Nortel Phone System. A user guide that provides the basic instructions on the features of the system can be accessed at [REDACTED]. The Business Services Liaison is responsible for interacting with the DCA Business Services Office for all telephone related issues.
2. On the job training on use of the telephone system will be provided as part of each new employee's orientation program.
3. Should an employee be transferred to another section within the Bureau, or be assigned another cubicle within the Bureau, the telephone set will accompany the employee to their new location.
4. All calls coming into the Bureau on the main telephone line (directly or transferred) and the 800 line are to be answered by the receptionist.
5. The Bureau's public telephone number is (916) 431-6959 and the toll free number is (888) 370-7589.
6. The Bureau has an automated voice system. Callers have the option of pressing any one of the following numbers when contacting the Bureau:
 - 1 – For general information.
 - 2 – To obtain student transcript or student records information.
 - 3 – To file a complaint or to speak with someone in the Enforcement Section.
 - 4 – To check the status of an application or for questions regarding the application process.
 - 5 – To obtain information on the Student Tuition Recovery Fund or closed schools.
 - 0 – To reach an operator.
7. During the times that the Bureau is not open for business, there is an afterhours greeting that informs that caller that the Bureau is closed and instructs them to call

back during regular business hours of Monday through Friday, from 8:00 a.m. until 5:00 p.m. excluding holidays. The afterhours greeting also gives the caller the option of leaving a message.

8. The receptionist shall answer the telephone within three rings. If by the fourth ring the phone has not been answered, the designated back-up to the receptionist shall answer the phone.
9. All staff in the Administration Unit are included in the main line telephone hunt group. Therefore, if an incoming call has not been answered within five rings, then an available staff member shall independently take the initiative to answer the call.
10. When answering incoming calls, a professional, business greeting should be used. The receptionist shall answer the telephone with the appropriate greeting for the time of day, i.e., good morning/afternoon/evening. The receptionist will identify to the caller that they have reached the Bureau for Private Postsecondary Education as well as identify themselves. For example, the receptionist may say "Good morning, Bureau for Private Postsecondary Education, this is Jane Doe, how may I assist you?"
11. If the caller identifies a specific individual they would like to speak with, the receptionist shall transfer the call to that individual. Unless the caller indicates they would like to speak with one of the Chiefs, the receptionist does not need to stay on the line to announce the caller to the intended recipient.
12. If the caller indicates that they would like to speak with a Chief, the receptionist will ask the caller to identify themselves, their place of business, and what the call is regarding. The receptionist will then place the caller on hold and contact the Chief to determine if the Chief would like to take the call.
13. Callers indicating that they would like to speak with someone from a particular unit (licensing, enforcement, etc.) shall be transferred to the designated Office Technician in the respective unit.
14. In order to provide excellent and efficient customer service, all staff within the Administration Unit shall be prepared to provide general information and answer general questions such as, but not limited to:
 - Where to find information on the Bureau website?
 - General application form questions.
 - Education verification/requests for transcripts.
 - The process for filing a complaint.
 - Educational institution approval status.
 - Information that can be provided by research in the statute and regulations.
 - Information that is available on the Bureau website.
15. If an employee is going to be out of the office, an appropriate "out of office" message shall be recorded as the alternate greeting for period of planned absences of one

day or more. The name, telephone number, or e-mail address of an alternate employee shall be provided as a contact for urgent issues or questions. The period of absence shall be noted in the message.

16. The receptionist or back-up is responsible for clearing voicemail messages left on the general Bureau voicemail system. Voicemail messages retrieved after 3:00 p.m. may be responded to the following work day. Voicemail messages retrieved prior to 3:00 p.m. shall be responded to the same work day. If the customer's phone goes to voicemail, an appropriate message indicating the name and telephone number of the employee trying to reach them will suffice as responding to their original message.

17. The Bureau often receives calls from legislators or legislative staff contacting the Bureau on behalf of their constituents, for clarification on statute or regulations, or other official business.

Calls received, or messages left, by legislators are a high priority. Calls from legislators shall be transferred or referred to a manager for response. The call shall be pre-announced. If the manager is not available, personal service shall be provided, such as ascertaining the nature of the call, a return telephone number (confirm the telephone number by repeating back) and informing the legislator that a manager will return the call. If the requested individual, or manager has an extended response time, then the legislator shall be contacted and provided an update. Every follow-up effort shall be made to assist the legislator the same day the call is received.

Calls received, or messages left, by legislative staff are also high priority. Most calls received by legislative staff members can be researched and responded to by an analyst or technician; however the call may also be referred to a manager. Every effort shall be made to assist the legislative staffer the same day the call is received. The respective manager of the unit that the question was regarding shall be made aware of the call and the response provided via an e-mail message.

18. Calls from the media are to be referred to the DCA Public Affairs Office, (916) 574-8170, for a departmental response in accordance with DCA Media Relation Policy, OPA 06-01. Bureau staff shall not attempt to answer any calls received from the media. The name of the caller, the media firm, a contact number, and the nature of the call shall also be provided via an email to the manager of the unit within the Bureau that the call was regarding.

19. Calls from the DCA Executive Office are high priority. Every effort shall be made to immediately assist the caller. Most often, they are trying to reach a member of the Bureau's Bureau Executive Management team. If the specific manager is not available, the receptionist shall offer to transfer caller to another Chief that is available.

20. The Bureau does not have any designated bilingual positions. Therefore, callers that do not speak English will need to be handled in one of two ways: through the DCA Consumer Information Center Call Center (CIC), or a three-way conference call with Language Line Services (an independent contractor).

Obtain the caller's name, call back number and ascertain the language spoken. Contact a CIC manager or supervisor to see if a bilingual designated employee can contact the caller and provide assistance.

The CIC manages the Department's subscription to Language Line Services. Over-the-phone interpreters can provide translation services in 170 different languages. Each Bureau employee that performs receptionist duties shall enter into a Language Line Services User Agreement. The Bureau's Business Services Liaison coordinates this function with the CIC Language Line Services Coordinator. Once the receptionist is established as a user of the service, he/she assigned a unique access code. When needing to utilize the service, the receptionist shall:

- Press the Conference soft key
- Dial: 1-800-874-9426
- Provide the Agency ID Number to the operator: [REDACTED]
- Provide the unique access code
- State the language requested
- When the translator comes on the line, obtain the translators ID number and briefly explain the situation
- Press the Conference key to connect all three parties
- Hang up the phone when assistance has been provided and call ended.

21. Bureau employees with a current bilingual certification may voluntarily provide assistance.

Bureau for Private Postsecondary Education Procedure

Title: Conference Room Scheduling Procedures	Supersedes: 2013-0074 July 19, 2013	Procedure #: 2013-0074
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 3
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that Bureau for Private Postsecondary Education (Bureau) conference rooms are reserved in an efficient and convenient fashion.

Purpose: This procedure outlines the process for reserving the three conference rooms within the Bureau so that everyone has equal access.

Definitions:

MS Outlook email – The Microsoft email service utilized by the Department of Consumer Affairs.

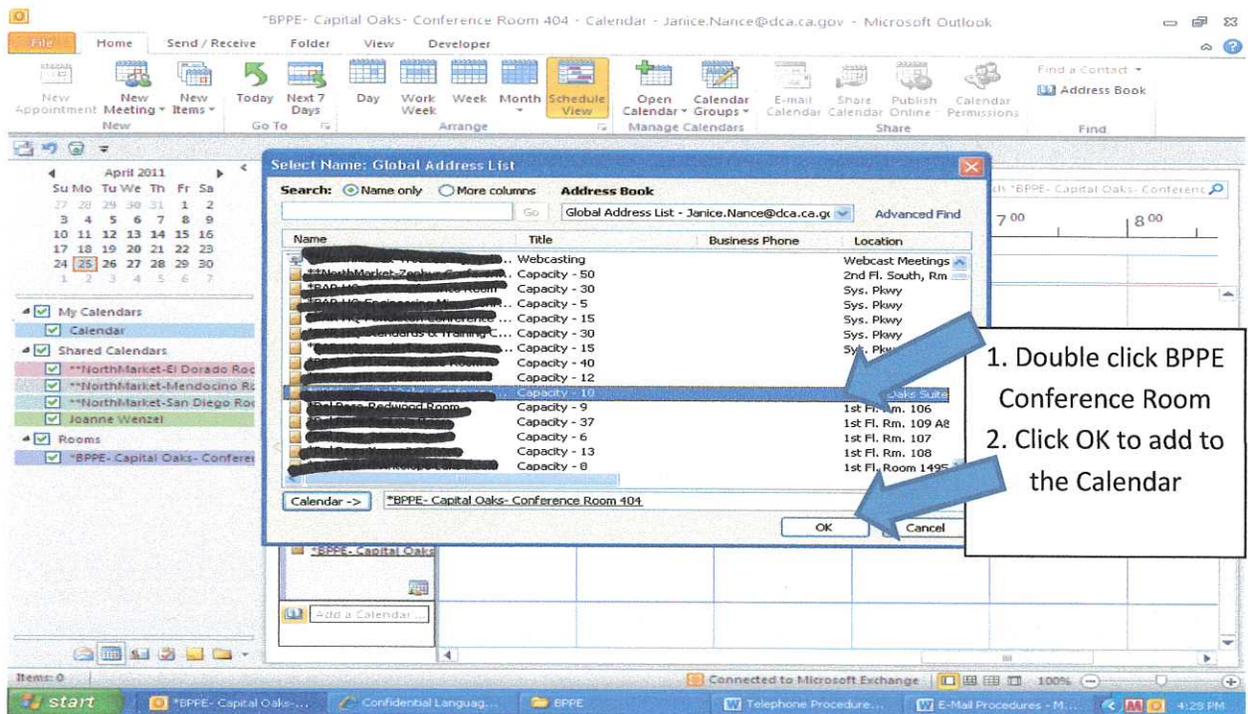
Productivity Benchmarks: N/A

Procedures for Scheduling a Conference Room:

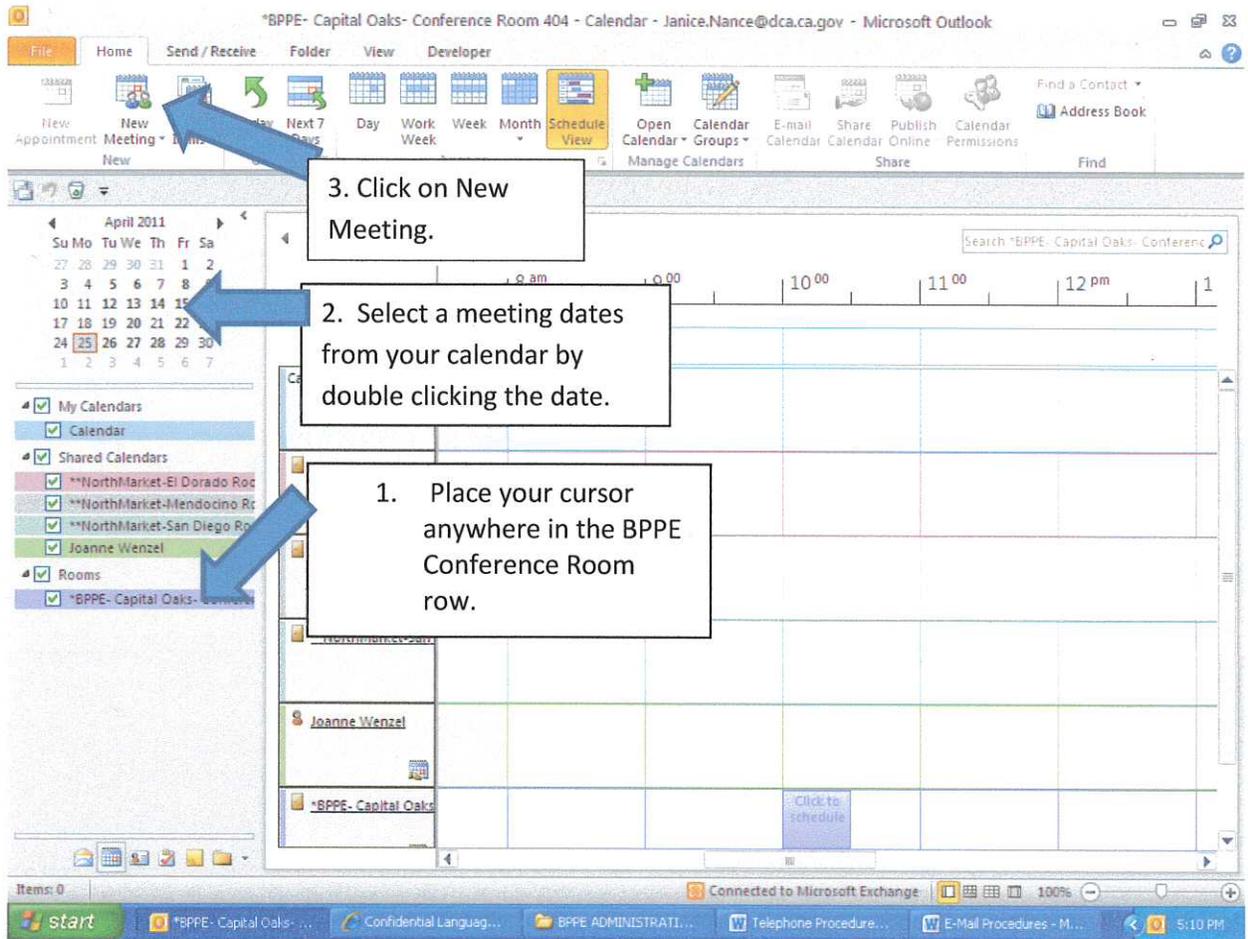
1. The Bureau has three conference rooms available for in-house meetings. To ensure room availability, employees should use the MS Outlook email meeting scheduler to reserve the large conference room. The two small conference rooms may be reserved utilizing a manual scheduling method.
2. When not scheduled for meeting purposes, the conference rooms may be used for employee breaks. Employees shall ensure that the room is left tidy and free from spills and crumbs. The table should be wiped clean after food items have been removed. No personal articles or food items are to be left in the room.
3. To schedule the large conference room for a meeting, the user will need to add the conference room to their calendar (see #14 below to schedule one of the two smaller

conference rooms). To do so, go to your email. Click on “Calendar” on the far left towards the bottom of the screen.

4. Left click on the “Open Calendar” icon.
5. Click on “From Room List” from the drop down menu.
6. In the search line type DCA-BPPE. Double click on DCA-BPPE- Capitol Oaks- Conference Room 404 and then click on “ok.” This conference room is now permanently added to your “Rooms.”



7. Click anywhere on the row for the BPPE Conference Room.
8. Select a date from your calendar for the meeting by clicking on the proposed date on the calendar at the top left of your screen.
9. Select a time for the meeting by clicking on the desired time on the desired meeting day.
10. Click on New Meeting and then select “New Meeting with All” from the drop down menu.



11. Complete and send the meeting request.

12. The room will be reserved for the date and time period requested.

13. One of the small conference rooms is located in Suite 400 and the other in Suite 450. Each can accommodate approximately 6 attendees.

14. Each of the smaller conference rooms has a calendar to write in reservations. The calendar for the conference room in Suite 400 is on the wall inside of the room. The calendar for the conference room in Suite 450 is located on the wall just outside of the conference room. To reserve, write your name, beginning time of your meeting, and ending time of your meeting on the calendar.

Bureau for Private Postsecondary Education Procedure

Title: Email Protocol Procedures	Supersedes: 2013-0075 July 19, 2013	Procedure #: 2013-0075
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 4
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure Bureau for Private Postsecondary Education (Bureau) staff utilizes the email system appropriately and efficiently to ensure maximal performance.

Purpose: This procedure outlines the process for setting up an email account, sending emails, and receiving emails.

Definitions:

Hardware – The physical parts or components of a computer such as the monitor, mouse, and keyboard.

Software – The machine-readable instructions that directs a computer's processor to perform specific operations such as SAIL, Microsoft Windows and iTunes.

Productivity Benchmarks: N/A

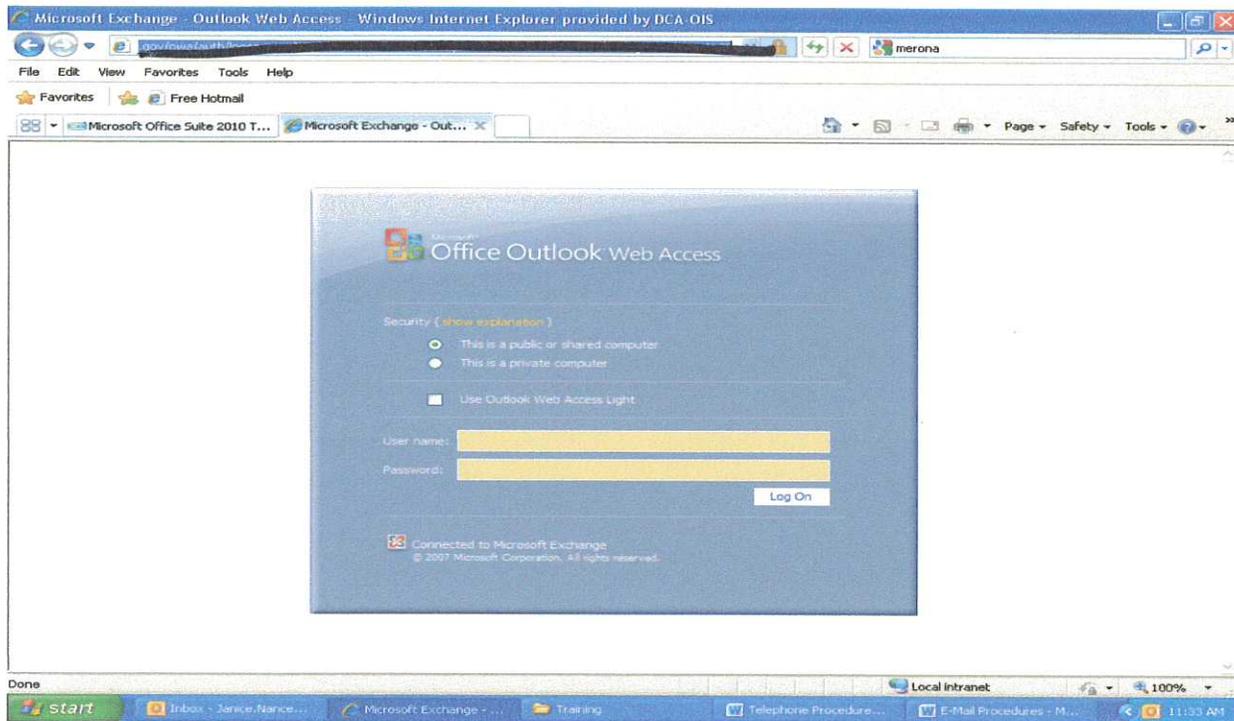
Email Protocols and Procedures:

1. The Bureau Office of Information Services (OIS) liaison is responsible for communicating the Bureau's email needs to OIS.
2. The Bureau Office Technicians are responsible for responding to routine emails and routing the more complex emails received on the Bureau's main email to the appropriate recipient. For example, the Licensing Unit Office Technician(s) are responsible for responding to or forwarding emails received on the general Licensing Unit email.
3. Emails received on the Bureau's main email will be opened each day by one of the Administration Office Technicians who will respond to general inquiry emails. If additional

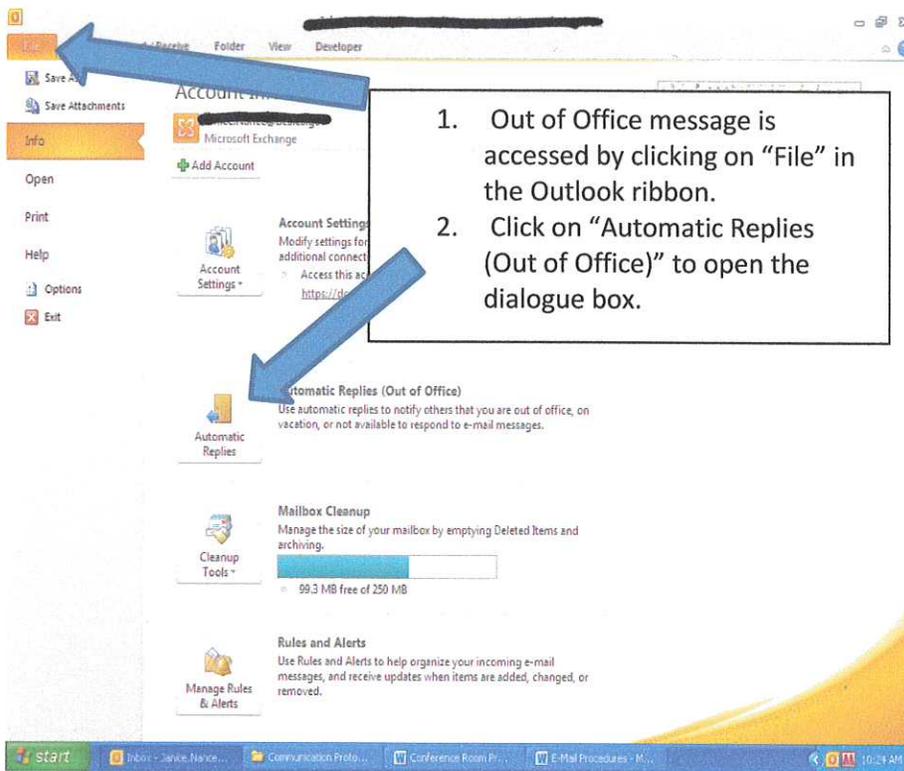
response is necessary, depending on the nature of the email request, they will then forward the email to the appropriate recipient.

4. Inquiry emails shall be responded to within 24 hours of original receipt. If research is required that will delay the response, then the Bureau staff person shall respond to the sender that their email has been received and is being looked in to. The staff person shall also inform the sender when he/she can expect a reply. If the staff person is unable to reply as anticipated then he/she shall follow up with the sender indicating the delay and revised response time.
5. The DCA uses Microsoft Outlook 2010. A quick reference guide is saved in the shared drive and employees are encouraged to independently take the initiative to review the reference material. To access the guide go to [\[REDACTED\]](#)
6. A SOLID training course is also available to learn the basic features/functions of Outlook 2010. Information on courses offered by SOLID can be accessed on the DCA Intranet at [http://intranet.dca.ca.gov/solid/office_2010.html](#)
7. The Bureau has six main email address:

BPPE@dca.ca.gov	The Bureau's main email address
BPPE.Licensing@dca.ca.gov	The Licensing Section email address
BPPE.Enforcement@dca.ca.gov	The Enforcement Section email address
BPPE.AnnualFee@dca.ca.gov	The BPPE Annual Fee email address
BPPE.AnnualReport@dca.ca.gov	The BPPE Annual Report email address
BPPE.STRF/ClosedSchool@dca.ca.gov	The BPPE STRF/Closed School email address
8. Each Bureau employee is assigned a DCA email address to be used for business related purposes. The standard configuration of the email address is: [\[REDACTED\]](#)
9. Each Bureau employee has the capability to remotely access their Bureau email account through their personal Internet provider using the following web address: [\[REDACTED\]](#)
10. Upon typing in the above address, the following screen will appear:



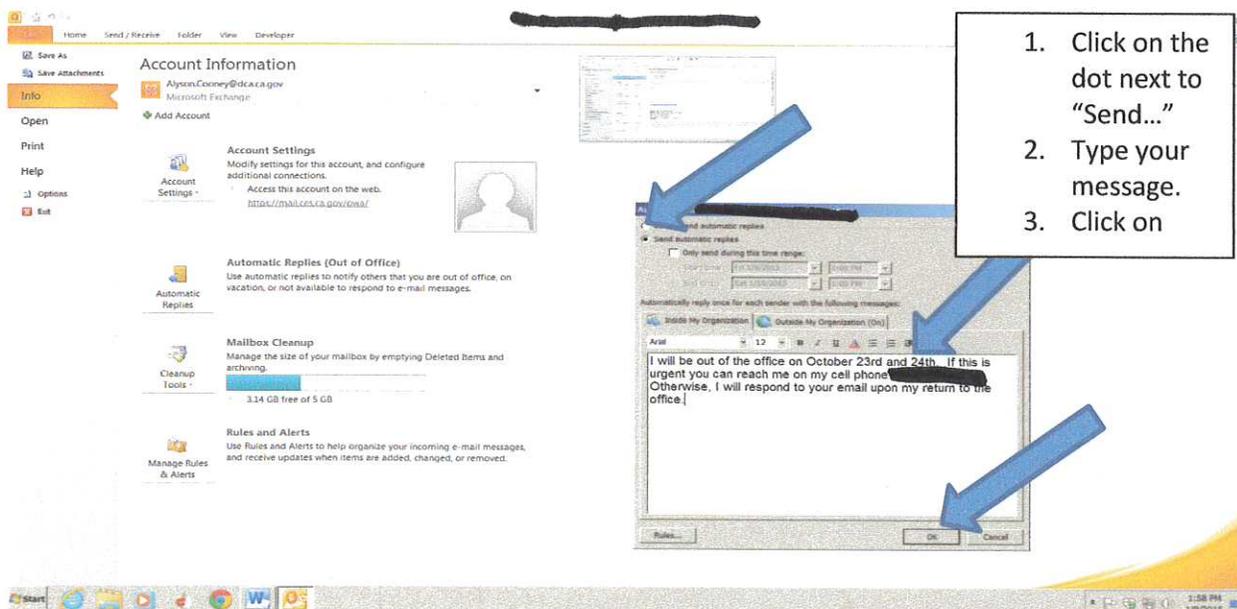
11. You will select either shared computer (library, coffee shop, etc.) or private computer (your home).
12. Type in DCA/ followed by your Bureau credential. For example, Jane Smith would type in DCA/BPJSMIT.
13. Type in your personal password. The password you created to access the department computer system.
14. If a Bureau employee expects to be absent from the office for one full day or more, then he/she shall enable an “Out of Office” message. The name, telephone number, or email address of an alternate employee shall be provided as a contact for urgent issues or questions. The out of office message shall also inform the reader the dates of absence.
15. To enable an “Out of Office” message click on the “File” tab on the Outlook ribbon.
16. Click on “Automatic Replies.”



17. Click on "Send Automatic Replies."

18. Create your unique message to be sent to anyone contacting you by email.

19. Then click on "ok."



Title: Cal-Card Procedures	Supersedes: 2013-0077 July 19, 2013	Procedure #: 2013-0077
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 4
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure Cal-Card purchases are in accordance with Department of Consumer Affairs (DCA) policy and State mandated requirements.

Purpose: This procedure outlines the process for placing orders using a State issued Cal-Card.

Definitions:

Cal-Card – A State issued credit card intended for routine purchases such as office supplies.

Productivity Benchmarks: The time spent ordering goods and reconciling the monthly Cal-Card statement will vary greatly depending on purchases during the month; however, during an average month the Office Technician will spend approximately 26 hours performing Cal-Card related duties.

Procedures for Using the Cal-Card:

1. When there is a need to order items not offered by the company approved to provide office supplies to State Departments, then quotes must be obtained in order to purchase these items from another vendor. Items such as ink and toner fall into this category. To place such an order, the following is required:
 - a. Obtain email addresses of small business vendors (Express, River City Office Supplies, Burkett's, etc.).
 - b. Request a quote from the small business vendors through email. Provide them the appropriate item number(s) or item descriptions and the quantity.
 - Orders of \$4,999 or less require two quotes.
 - Orders for \$5,000 to \$25,000 require three quotes.
2. Once the required number of quotes has been obtained, contact the lowest priced vendor and place the order.
3. The following documents shall be completed or obtained from the vendor, if applicable:
 - a. Post-Consumer Content Form - downloadable at [http://www. \[REDACTED\] /Forms/Cal-Card%20074.pdf](http://www. [REDACTED] /Forms/Cal-Card%20074.pdf)
 - b. Payee Data Record – downloadable at [http://www. \[REDACTED\] /PDF-13-11-01CW-Attachment-5-Payee-Data-Record.pdf](http://www. [REDACTED] /PDF-13-11-01CW-Attachment-5-Payee-Data-Record.pdf)
 - c. Seller's Permit
 - d. SB/DVBE Certification print-out
 - e. CCC-307 Certification Form – downloadable at [www. \[REDACTED\] /CCC-307](http://www. [REDACTED] /CCC-307)
 - f. State Bidder Instructions, Non-IT General Provisions, IT General Provisions, and DVBE program Requirement Proof Documentation
 - g. Purchase Order
 - h. Statewide Mandatory Contract Off-Ramp Justification Memo
 - i. Bidder Declaration – downloadable at [http://www. \[REDACTED\] /CCC-307.doc](http://www. [REDACTED] /CCC-307.doc)
 - j. DARFUR Certification – downloadable at [http:// \[REDACTED\]](http:// [REDACTED])
4. Fill out a Bid Quote Worksheet for each bid received. The Bid Quote Worksheet is downloadable at [http:// \[REDACTED\]](http:// [REDACTED])
5. When the order arrives, retrieve the corresponding documents from the pending office supply order file and check off the items received on the Purchase Order. Make note of any items that are backordered and follow up if the items are not received within the stated timeframe. Compile all of the paperwork regarding the

10. Set #1, set #2, and set #3 shall be submitted to DCA, Business Services Office, by the 30th of each month. Failure to submit the required documents to BSO by the 30th of the month may lead to the Bureau's Cal-Card delegation being rescinded.
11. Place set #4 in the Cal-Card binder located at the Administration Unit Office Technician's desk.

Title: School Closure Procedures	Supersedes: 1013-0078 July 19, 2013	Procedure #: 2013-0078
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 5 10
Issue Date: March 10, 2015	Approved By: Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The closed school analyst is responsible for ensuring that Bureau approved private postsecondary schools that close, do so in accordance with California statutes and Bureau regulations.

Purpose: By ensuring private postsecondary schools that close, do so appropriately to ensure protection of California students and consumers.

Definitions: N/A

Productivity Benchmarks: The full-time analyst responsible for this function spends 100% of his/her time dealing with issues related to closing and closed schools.

Procedures for Closing a School:

1. The Bureau for Private Postsecondary Education receives notice of school closures by a variety of methods, such as, but not limited to:
 - Verbal or written notice from the school's owner or administrator.
 - Verbal or written notice from students.
 - Verbal or written notice from the United States Department of Education.
 - Verbal or written notice from an Accreditation Agency.
 - Verbal or written notice from a financial institution.
 - Undeliverable mail being returned.
 - Bureau site visit or audit.
 - Written or verbal notice from another school.
 - Contact by the media.
 - Bureau staff inadvertently comes across information.
 - Written or verbal notice from another consumer agency.

2. Upon receipt of the above information, the Closed School Analyst shall immediately notify the Bureau Chief, Deputy Bureau Chief, Enforcement Chief, Licensing Chief and Administration Manager by email.
3. Conduct a comprehensive research of the school's historical information, including, but not limited to the following:
 - Review information contained in SAIL.
 - Consult with the Complaint Unit for open complaints / or check SAIL for any open complaints (look at Enforcement tab). If there are open/unresolved current complaints advise the Complaint Unit manager of school's closure or pending closure.
 - If SAIL indicates that a compliance inspection is scheduled, ensure the Compliance Unit manager is advised of school's closure or pending closure.
 - Check the Revenue Tracking tab in SAIL for STRF and Annual Fees to determine if school is current on Annual Fees and STRF Assessment Fees (reason: BPPE needs to ascertain if the school is current on STRF Assessment forms/payments).
4. If owner has abruptly closed the school and the analyst cannot reach anyone at the school, request the school's file from Bureau file room in order to find the owner's cell phone number and home address.
5. Locate current contact information for the school's owner. If unable to acquire current contact information, try obtaining it from one of the following:
 - Check the school's file for owner information; seek a cell phone number and a home address.
 - Search the Internet for school information using search engines such as Google, LinkedIn, etc.
 - Contact the Secretary of State to request corporate or limited partnership records.
████████████████████
 - Contact local or State authorities that authorize business licenses.
 - If applicable, contact other DCA boards or bureaus for licensing information.
 - Contact accreditation agencies.
 - Contact the United States Department of Education.
 - Public bankruptcy information.

(See **Closed School Resources Checklist**) which can be located on the G drive. The path is: G:\BPPE\BPPE STUDENT TUITION RECOVERY FUND\z_Susan Hertle\Resources Checklist
6. Contact school's owner to:
 - Confirm the school's closure or pending closure.
 - Request how many students will be affected by the school's closure.
 - Verify if the affected entities, main, branch(es), satellite(s), etc.

- Advise the school of proper closure procedures according to the State law and Bureau regulations. Advise where they can obtain a copy of the laws and regulations. Provide copy of the 7 Steps to a Successful School Closure.
 - Request a roster of current students.
 - Advise School of student transcript regulations.
 - Obtain Custodian of Record information and update SAIL as soon as possible.
 - Advise the school and/or the students of their options: teach-out or transfers to other schools if either has been chosen as a solution by the school for the students.
 - Advise the school to provide a copy of "Students Rights and Options" to the currently enrolled students.
 - Copy of Letter to student pertaining to rights and information on school's closing is to be included in Closed School Form.
7. Mail out the School Closure Letter with School Closure Plan Form (Send Certified mail and regular mail).
- Log date mailed in mailing log
 - Start a "Task Manager" in Microsoft Outlook to track all events regarding the school closure (e.g.: date closed school letter was sent, date certified mail card was received by BPPE, dates and times of all conversations and emails with owner or representative of the school and set a follow up date for receipt of the completed Closed School Plan form and all supporting documentation necessary to properly close the school.
 - Start Closed School File to track closing process, correspondence and notes.
 - Attach copy of "Quick View" detail school report from SAIL (staple on the left side of red folder).
 - Place copy of Closure Letter in Closed School file, with certified mail receipts.
 - Place all information pertaining to closure in the Closed School file.
 - Request from the school a complete Student List to include all students in attendance at time of closure, and within the past 60 days.
 - The student list should include the following information:
 - a. Student's name
 - b. Student's address
 - c. Student's phone number
 - d. Student's social security number (not always necessary)
 - e. Student's status (i.e. current, dropped, withdrawn)
 - f. Course of instruction (including start date and completion date)
 - g. List of students participating in Federal Financial Aid
 - h. List should note if any refunds were provided to the students. If so, what was the refund amount.?
8. Notate SAIL to reflect closure.

- Include in Comments notes in SAIL the reason for the closure
 - Date of Closure
 - Update SAIL Notes to include the information provided on returned, completed closure form, such as: Custodian of Information. Under the Custodian tab in SAIL, update the Custodian of Records information.
 - Update new contact information for the school
 - Any information pertinent to school's closure add to SAIL notes.
 - Log schools closure information in CLOSED SCHOOLS log on G drive
9. At beginning of each month, generate a previous months closing report from CLOSED SCHOOLS data base on the G drive and send to the Enforcement Department, Compliance Department and Licensing Department.
10. Closed School Folders- these items should be kept in each closed school folder:
1. School Closure Checklist, completed by analyst
 2. Closed School completed form
 3. Closure Letter to School Owner
 4. Copy of closure letter to Students (from school)
 5. Proof of mailing
 6. Correspondence from Students, School owners, Custodian of Records, etc.
 7. When completed Closed School Form is received back to BPPE, check for completeness of form. (if incomplete, contact owner for additional information needed)
 8. Work with STRF Unit to aid students in applying for STRF and contacting the DOE.
 9. Notify Enforcement if the school does not comply to BPPE's Laws and Regulations for School Closure Procedures.
 10. All investigative information (website printings, Secretary of State's findings, etc.)

BPPE's laws and regs regarding proper closure procedures:

Article 15. Orderly Institutional Closure and Teach-outs

94926. Procedures Prior to Closing, Teach-Outs

At least 30 days prior to closing, the institution shall notify the bureau in writing of its intention to close. The notice shall be accompanied by a closure plan, which shall include, but not necessarily be limited to, all of the following:

(a) A plan for providing teach-outs of educational programs, including any agreements with any other postsecondary educational institutions to provide teach-outs.

(b) If no teach-out plan is contemplated, or for students who do not wish to participate in a teach-out, arrangements for making refunds within 45 days from the date of closure, or for institutions that participate in federal student financial aid programs arrangements for making refunds and returning federal student financial aid program funds.

(c) If the institution is a participant in federal student financial aid programs, it shall provide students information concerning these programs and institutional closures.

(d) A plan for the disposition of student records.

94927. Institution in Default

An institution shall be considered in default of the enrollment agreement when an educational program is discontinued or canceled or the institution closes prior to completion of the educational program. When an institution is in default, student institutional charges may be refunded on a pro rata basis if the bureau determines that the school has made provision for students enrolled at the time of default to complete a comparable educational program at another institution at no additional charge to the students beyond the amount of the total charges in the original enrollment agreement. If the institution does not make that provision, a total refund of all institutional charges shall be made to students.

NOTE:

The Closed School is responsible for storing and maintaining their own Student records. The Bureau will accept the reasonability of Custodian of Records only under special circumstances.

94927.5. Provision of Records to Bureau Prior to Closing

(a) Prior to closing, an institution shall provide the bureau with the following:

(1) Pertinent student records, including transcripts, as determined by the bureau, pursuant to regulations adopted by the bureau.

(2) If the institution is an accredited institution, a plan for the retention of records and transcripts, approved by the institution's accrediting agency, that provides information as to how a student may obtain a transcript or any other information about the student's coursework and degrees completed.

(b) Subdivision (a) applies to all private postsecondary institutions, including institutions that are otherwise exempt from this chapter pursuant to Article 4 (commencing with Section 94874).

94900. Required Student Records

(a) An institution shall maintain records of the name, address, e-mail address, and telephone number of each student who is enrolled in an educational program in that institution.

(b) An institution shall maintain, for each student granted a degree or certificate by that institution, permanent records of all of the following:

(1) The degree or certificate granted and the date on which that degree or certificate was granted.

(2) The courses and units on which the certificate or degree was based.

(3) The grades earned by the student in each of those courses

71930. Maintenance of Records.

(a) An institution shall maintain all records required by the Act and this chapter. The records shall be maintained in this state.

(b)(1) In addition to permanently retaining a transcript as required by section 94900(b) of the Code, the institution shall maintain for a period of 5 years the pertinent student records described in Section 71920 from the student's date of completion or withdrawal.

DENIAL OF APPLICATION vs. CLOSED INSTITUTION

Policy: How to properly handle the Appeals process when a school is issued a Denial for Approval to Operate.

Purpose: To allow schools who have been issued a Denial to operate during the Appeal Process.

BPPE Licensing Unit issues schools Denial Letters when their Approval Application is not approved. Licensing Unit will provide the Closed School Unit with a copy of the Denial Letter. The school has up to 60 days from the date of the denial letter to file for an Appeal. If the school does file an appeal within the 60 day timeframe, they are allowed to operate during the appeal process.

If the school does not file an appeal, they are to cease operating.

Definitions:

Productivity Benchmarks: Schools are granted a 60 day timeframe from the date of the Denial Letter to file for an Appeal with the BPPE.

The Appeal process can take up to 18 months for a final determination. When a school's status is granted "DENIED" or "TERM DENIED", do not change the school's status in SAIL to "CLOSED". SAIL should always reflect the true and accurate status of what has transpired with the school's renewal process.

Schools have the opportunity to appeal their denial. The Closed School Unit does not contact the institutions that have been denied a renewal until after the 60-day appeal timeline has passed and the school **has not** requested an appeal.

Procedures:

Section A	
<p>1. Closed School Analyst will receive a copy of the Denial Letter. On the upper right hand corner of the denial letter, write the date which is 60 days out from the date of the letter. (*Please refer to Laura Metune's email dated 3/18/2013, below).</p> <p><u>Effective immediately, until further notice, the Closed School Unit should not call institutions that have been denied a renewal application until after the 60-day appeal timeline has passed and the institution has not requested an appeal.</u></p> <p>If an institution denied an initial application for approval asks the Closed School Unit questions regarding their ability to operate during appeal of the denial, please refer the call to the Enforcement/Discipline AGPA.</p>	Closed School Analyst

<p>For your reference: Unless exempt as outlined in Article 4 of the Act (commencing with CEC §94887) or in compliance with the transition provisions contained in Article 2 of the Act (commencing with CEC §94802), an institution is prohibited from operating without Bureau approval (CEC §94886). Pursuant to CEC §94891, the renewal of an approval to operate is only issued after the institution has demonstrated continued capacity to meet the minimum operating standards. Pursuant to 5 CCR §71475(ii) and 5 CCR §71480(g) an institution's prior approval to operate continues only until the Bureau has taken action on a renewal application. The appeal process is contained in 5 CCR §71400.5 and Government Code §11500 (Administrative Procedures Act). Please see your manager if you have any questions. Thanks, Team!</p>	
<p>2. Open Task Manager in Microsoft Outlook. Generate a new task. Type in the name of the school. In comments, type <i>"Denial Letter mailed xx/xx/xxxx. Application #2xxxx. Has school filed an appeal?"</i> Set the follow up/reminder date for 61 days.</p>	Closed School Analyst
<p>3. The reminder alert will pop up on the 61st day on Outlook. Via email, confirm with the BPPE Discipline AGPA whether or not the school has filed an appeal. If school has filed for an appeal, print the Discipline AGPA's email response. Staple it on top of the denial letter.</p>	Closed School Analyst
<p>4. 3-hole punch the email response and the denial letter, place the letter and email alphabetically in the binder marked "Appeals".</p>	Closed School Analyst
<p>5. Reset the Task Manager for 11 months from the current date (from today's date). At the 11 month reminder, check SAIL to determine if the Denial stands or if the school was provided an Approval to Operate. Checking SAIL will include looking at comments in SAIL – specifically looking for comments inserted by the AGPA Discipline Unit. Also check the approval status and the application status in SAIL.</p>	Closed School Analyst
<p>6. If no new comments are inserted regarding the decision on the appeal, re-set the Task Manager Reminder date out another 4 to 6 months. Repeat the same steps at 4 to 6 months if a decision is still not determined. (The Appeal process can take anywhere</p>	Closed School Analyst

<p>from 11 months to 18 months).</p>	
<p>Section B</p>	
<p>1. If the school did not file for an Appeal, and the Closed School Analyst has waited the allotted 60 days, a Closed School Letter along with the School Closure Plan Form shall be mailed via U.S. Post Office, Certified Mail, to the owner of the school, as well as sending the closed school packet via email if a viable email address is available.</p>	<p>Closed School Analyst</p>
<p>2. The Closed School Letter and the School Closure Plan Form can be located in the "G" Drive. The path is: [REDACTED] [REDACTED]\Closed School Letters Mailed. The path to the School Closure Plan Form: [REDACTED] (use the Jan. 2014 updated form).</p>	<p>Closed School Analyst</p>

EXPIRED APPROVALS PROCEDURES

Licensing Unit will prepare the "Expired Approval Closed School Referral" sheet (yellow) and submit to the Closed School Unit.

1. Determine if a Renewal to Operate Application or a New Application has been received by checking SAIL "**Applications**" tab.
 - If application has not been received, review the Enforcement tab, looking for Violation Confirmed - Notice of Violation notation or Violation Confirmed - Citation and Fine notation. Review Notes / Comments in SAIL for any Enforcement activity. Check BPPE's website under the Enforcement Tab, Disciplinary Actions, looking for any Citations and/or Accusations against the school. If any of these items are found, **stop!** do not proceed without contacting a supervisor.
 - If there are no Citations and/or Accusations and nothing pending in the Enforcement Section, continue as follows:
2. Review the section on the yellow Expired Approval Closed School Referral sheet, "Check for fee payments" – Licensing will provide notes if the school's STRF Assessment Reporting fees and Annual Fees payments are delinquent, infrequent or current. This provides an indication if the school is still operating or may have closed without notifying the Bureau.
3. Make contact with the school's owner via a phone call.
 - Provide school owner with information that their approval to operate has expired. Provide the following law from California Code of Regulations - Title 5. California Code of Regulations Division 7.5. related to applying for re-approval:

Article 6. Renewals. 71475. Renewal of an Approval to Operate for a Non-Accredited Institution; Cancellation of an Approval to Operate.

(jj) An approval to operate that has expired may be renewed at any time within 6 months after its expiration on filing of an application for renewal and, as a condition precedent to renewal, payment of all accrued and unpaid renewal fees, late payment penalty fees prescribed in subdivision (e) of this section, and any other fees that would have been due in order to renew timely. After an approval to operate has expired for more than 6 months, the approval is automatically cancelled and the institution must submit a complete application pursuant to section 71100, meet all current requirements, and pay all fees that would have been due in order to timely renew, in order to apply for approval.

- Provide information to the school that all outstanding STRF Assessment Report Form fees and all outstanding Annual Fees will also need to be brought current in order to qualify for renewal.

4. If unable to contact school:
 - (1) Research Internet for school information such as:
 1. Internet search/Google search
 2. Corporation or LLC information/Secretary of State
 3. Business license
 4. Other State Licensing Boards and Bureaus as:
 - a. Board of Barbering and Cosmetology (contact: Christine Jones)
 - b. Board of Nursing
 - c. California Department of Health
 5. Bankruptcies
 6. Department of Education
 7. Accreditation Agencies
 8. Telephone listings
 - (2) Obtain School's file from Licensing Section of File Room
 - a. Mail out School Closure Letter with Closure Form by certified mail to school and to owner's address
 - b. Log date etc. in mailing log
 - c. Start Closed School File (red) to track correspondence and notes.
 - d. Start "Task" reminder in Outlook – set follow-up date (use the 6 month renewal period as the follow up date), for receipt of any information regarding the school, specifically receipt of the new or renewal approval to operate application.
 - e. Attach copy of "Quick View" detail school report from SAIL.
 - f. Attach copy of Closure Letter in Closed School file, with certified mail receipts.
 - g. Place all information pertaining to closure in the (red) Closed School file.
 - h. Any pertinent information to school's expired approval and/or the closure, and/or the new/renewal application(s), add to SAIL notes.
 - i. If determined that the school is operating without bureau approval beyond the 6 month renewal period, complete Enforcement Referral.

Bureau for Private Postsecondary Education Procedure

Title: Bureau Security Procedures	Supersedes: 2013-0069 July 19, 2013	Procedure #: 2013-0069
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that the Bureau for Private Postsecondary Education (Bureau) workplace is a safe and secure environment.

Purpose: This procedure outlines the process for maintaining Bureau security.

Definitions: N/A

Productivity Benchmarks: N/A

Bureau Access Security Procedures:

1. Full access to Bureau offices is restricted to Bureau personnel.
2. Only individuals authorized to conduct official business or individuals known to an employee shall be permitted to enter the office. Such individuals shall be escorted by a Bureau employee at all times.
3. Until permission is granted for visitors to enter the office, visitors shall remain in the reception area outside of the office.
4. Friends and family members visiting the Bureau shall remain in the reception area until the employee they are visiting comes and escorts them. Friends and family members shall not be left unattended inside the office at any time.
5. The Bureau has three secure areas not readily accessible to employees. For access to these areas, see a manager. These areas are:
 - File Room

- Equipment Room
 - Supply Room
6. The Bureau has internal access to several outdoor patios. For employee safety, no one is permitted to access the patio areas. The patio doors shall remain locked at all times.
 7. The Bureau alarm system is activated between 6:00 a.m. and 7:30 p.m. Monday through Friday. On weekends and State holidays the system is activated all day. Special permission must be granted by a Chief for an employee to access the suite prior to 7:00 a.m. and after 6:00 p.m. If the alarm is set off, the alarm company will first attempt to contact the Deputy Bureau Chief. If he/she cannot be reached then the alarm company will immediately contact the California Highway Patrol (CHP). The CHP has jurisdiction over all state property and employees.
 8. Bureau employees have each been assigned a card key for access to the Bureau's office suites. Card keys are the property of the alarm company. For security purposes, all employees shall present their card key to the card reader every time they enter the suite.
 9. Employees must immediately notify the Administration Unit manager if they lose or misplace their card key. A replacement fee of \$4.50 is charged by the alarm company and is the responsibility of the employee.

Title: OIS Service Request (Problem)	Supersedes: 2013-0080 July 19, 2013	Procedure #: 2013-0080
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure Bureau for Private Postsecondary (Bureau) information technologies needs are submitted to the Department of Consumer Affairs (DCA) Office of Information Services (OIS) in accordance with DCA policy and procedure.

Purpose: This procedure outlines the process for submitting an OIS service request when a Bureau manager reports a problem or service needed.

Definitions:

Hardware – The physical parts or components of a computer such as the monitor, mouse, and keyboard.

Software – The machine-readable instructions that directs a computer's processor to perform specific operations such as SAIL, Microsoft Windows and iTunes.

Productivity Benchmarks: The process for placing a service request will vary depending on the number of reported problems or requests; however, each individual request submission will take approximately 10 minutes to complete.

OIS Service Request (Problem) Procedures:

1. Upon experiencing a computer hardware or software problem or an identified need, the user shall notify his/her immediate supervisor of the problem/request
2. Upon notification of the problem/request, the supervisor shall send an email to the Bureau Information Technology (Liaison) with a cc to the Administration Manager. The email shall contain a detailed description of the problem/request, the name of the employee, the

IP address of the computer, employee's phone number and the employee's cubicle number.

3. Upon receipt of an email regarding a hardware or software problem, the Liaison shall log the request on the Tracking Log. The Tracking Log is located as follows: [\[REDACTED\]](#)
[ADMINISTRATIVE SERVICES - Mid Level Support - Telecommunications Requests](#).
4. The Bureau OIS Liaison shall submit an email service request to the DCA OIS at [\[REDACTED\]](#) requesting the applicable services. The email service request shall include a detailed description of the problem/request, the name of the employee, the IP address of the computer, employee's phone number and the employee's cubicle number.
5. Upon receipt of the service request, OIS will provide the Liaison with a service request number. The Liaison shall record the service request number on the tracking log.
6. The DCA OIS will provide periodic updates on the status of the service request. Updates shall be recorded on the Tracking Log.
7. If the Liaison has not been contacted by OIS indicating that they are working on the problem/request within 24 hours if a work stoppage, or 48 hours if a not work stoppage, then the Liaison shall contact OIS for a status. The Liaison shall continue following up at regular intervals until resolved/completed.
8. Upon resolution/completion of the service request, OIS will notify the Liaison. The Liaison shall notify the appropriate manager and user that the problem/request has been resolved/completed and confirm that they are satisfied with the outcome.
9. The line item on the Tracking Log can then be updated and shaded to indicate completion.

Title: Procedure for Generating a new Annual Fee Invoice	Supersedes: 2013-0081 July 19, 2013	Procedure #: 2013-0081
Procedure Owner: Administration Unit	Effective: July 19, 2013	Pages: 3
Issue Date: April 30, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that fees are invoiced and collected in accordance with Bureau for Private Postsecondary Education (Bureau) laws and regulations, State Administrative Manual procedures and Department of Consumer Affairs (DCA) policy.

Purpose: This procedure outlines the process for generating an annual fee invoice.

Definitions:

Schools Automated Information Link (SAIL) – The data base that stores information on private postsecondary schools operating in California.

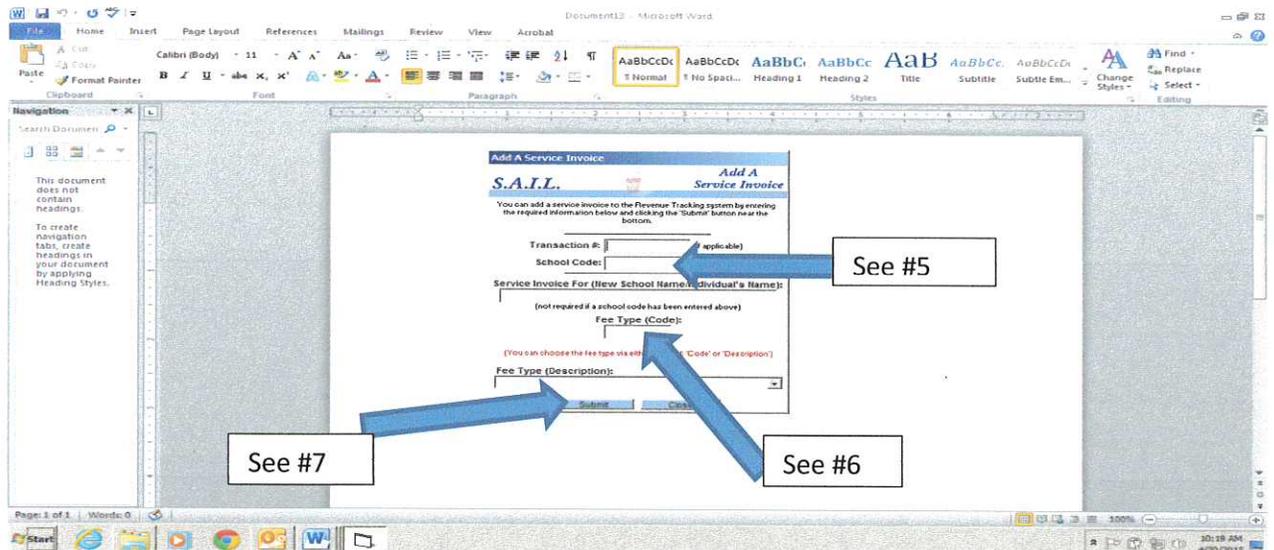
Productivity Benchmarks: Generating a new invoice will take five to 10 minutes per invoice.

Procedures for Generating a New Annual Fee Invoice:

1. If after generating the Annual Fee invoices it is discovered that an invoice didn't generate, or is incorrect, a new invoice must be generated.
2. To generate a new invoice the Bureau fiscal analyst will log into SAIL.
3. Click on "Revenue Tracking" towards the bottom of the blue box on the left side of the screen.
4. Click on "Add a Service Invoice" in the middle of the screen.
5. Input the school code. See Table 1.

6. Input the fee type. The annual fee type is ~~XXXXXXXXXX~~. See Table 1.
7. Click on "Submit." See Table 1.

Table: 1



8. A new invoice is created.
9. Fill in the "Due Date."
10. Fill in the "First Delinquent Date."
11. Fill in the "Annual Fee Information Month."
12. Fill in the "Annual Fee Information Year."
13. Click on "Save Work."
14. Return to the main SAIL screen.
15. Insert the school code in the box at the top left and click on "Go."
16. Click on the "Revenue Tracking" tab. See Table 2.
17. Find the invoice number. See Table 2.

Table 2:

The screenshot displays the 'S.A.I.L. Schools' General Information' web application. The top navigation bar includes 'Report Center', 'Add/View Comments', 'Save Work', 'Add School Item', 'A Glance', and 'Back To Main'. The main content area is divided into several sections: 'Institution's Program Types' with filters for Vocational, Degree, Registration, Title Job, Religious Exempt, Exempt, Residential, and Distance Learning; 'School Information' with fields for School Status (Active), Status Date, Site Type (Branch), School Code, and Institution Code; 'School/Institution Name'; 'Title IV Funding?' and 'ORE ID'; 'School Physical Address' and 'Addressing Preference'; 'School Mailing Address' with fields for CA Number, Phone Number, and Fax Number; and 'Web Address (URL Address)' and 'Assigned Nurses Staff'. A table at the bottom is titled 'All Financial Invoices Associated With School Code #99542506 Or Institution Code #500121'. The table has columns for Invoice #, Fee Description, Invoice Date, Amount Paid, Annual Fee Period, STR Period, and Train No. A blue arrow points to the first row of the table, and another blue arrow points to the 'Print Revenue History' button. Two callout boxes labeled 'See #16' and 'See #17' are present.

Invoice #	Fee Description	Invoice Date	Amount Paid	Annual Fee Period	STR Period	Train No.	Check Date
900304795							
90030302							
90030309							
900302144							

18. Click on the down arrow next to the invoice number to print the invoice.



Bureau for Private Postsecondary Education Procedure

Title: Procedures for Purchasing	Supersedes: None	Procedure #: 2013-0082
Procedure Owner: Administration Unit	Effective:	Pages: 3
Issue Date: July 19, 2013	Approved By: Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that all Bureau purchasing is done within the State mandated requirements.

Purpose: This procedure outlines the purchasing process.

Definitions:

SB – Small Business

DVBE – Disable Veterans Business Enterprise

PO – Purchase Order

BSO – Business Service Office

The Governor Created the Small Business/Disable Veterans Business Enterprise (SB/DVBE) program to assist SB/DVBE vendors by giving them first consideration in procurement and contract opportunities. The SB/DVBE Certification is required when doing Business with a certified SB/DVBE vendor.

Productivity Benchmarks: The overall process for purchasing and can take approximately 4 hours. The process involves selecting products, obtaining quotes from vendors, completing the required forms and providing the necessary supporting documentation.

Procedures for purchasing:

1. Determine the goods or products Bureau needs.
2. Requests for quotes based on the following procurement methods.

- **For Office Supplies**, first go through the DGS mandatory contract (#1-10-75-55) vendor such as National Office Solutions.
 - **For Office Supplies that we cannot find through the mandatory office supply catalog**, get 2 quotes from SB/DVBE vendors. Email Kevin Aria (kevin.aria@delaware.gov) for a list of SB/DVBE vendors.
 - **For IT Equipment (printers etc.)**, go through the DGS mandatory contracts (various) vendors. If you have questions, please contact Fredy Lemus (Fredy.Lemus@delaware.gov) from DCA/BSO office for guidance. IT purchased required OIS approval.
 - **For Toner (New)**, go through the DGS mandatory contracts (#1-10-74-60A) vendor such as ~~Multimedia Stationers Office Products~~.
 - **For Toner (Re-manufactured)**, go through the DGS mandatory contracts (#1-10-75-60A) vendor such as ~~PC Specialist~~, Inc. DBA Technology Integration Group (TIG).
 - **For Toner (New or Remanufactured not found in the mandatory contracts)**, get 2 quotes from a SB/DVBE vendors. In addition, the Bureau must have an exemption from the mandatory vendors stating they do not have or carry the specific toner we need. Email ~~Kevin Aria~~ (kevin.aria@delaware.gov) for list of SB/DVBE vendors.
 - **For paper**, if the purchase is a minimum of 40 cases (1 pallet), go through the DGS mandatory contract (#1-09-75-41B) vendor ~~Stay Safe Supply~~.
 - **For paper**, if the purchase is not to exceed 39 cases, then go through the DGS mandatory contract (#1-10-75-55) vendor ~~National Office Solutions~~.
3. Submit the completed Purchase Request Package (BSO-47) to ~~BSO~~ for processing. Please note that only supplies and paper purchase less than 40 cases can be purchase using Cal-Card. As for the rest of the acquisitions, they must be procured through completing the ~~BSO-47~~ form.
 4. Fill out the Purchase Request Log – to track all requisitions (when sent to BSO, what analyst it was assigned to, REQ number, etc) ~~G. [REDACTED] BPPE~~
~~ADMINISTRATIVE SUPPORT SERVICES~~
 5. BSO will complete PO/Contracts and submits to the vendors for processing.
 6. BSO will provide BPPE with a copy of the PO with property tags.
 7. BPPE received goods or products from vendors.

8. Once the goods or products are received, BPPE returns the stock received certificate back the BSO.

Figure 1 below is a summary of the different procurement methods discussed in #2.

Type	Method	Vendors	Mandatory State Contracts	Approval Required	Acquisition Method
Office Supplies	Mandatory Contract	National Office Solutions	1-10-75-55		Acquisition Request BSO-47 or CAL-Card
Office Supplies (not in mandatory office supply catalog)	2 quotes from SB/DVBE vendors	Email Kevin Aria for listing of SB/DVBE kevin.aria@dca.ca.gov			Acquisition Request BSO-47 or CAL-Card
IT – Equipment (printers, etc.)	Mandatory Contracts	Contact Fredy Lemus from DCA/BSO office for guidance Fredy.lemus@dca.ca.gov	Various	OIS (Send IT Justification form and Requisition BSO3045 together to OIS)	Acquisition Request BSO-47 only
Toner (New)	Mandatory Contract	Midtown Stationers Office Products	1-11-75-60B		Acquisition Request BSO-47 only
Toner (remanufactured)	Mandatory Contract	PC Specialist, Inc. DBA Technology Integration Group (TIG)	1-10-75-60A		Acquisition Request BSO-47 only
Toner (new or remanufactured not found in the mandatory contracts)	2 quotes from SB/DVBE – must have an exemption from the mandatory vendors stating they do not have or carry the specific toner you want	Email Kevin Aria for listing of SB/DVBE kevin.aria@dca.ca.gov		Written exemptions from mandatory contract State Contract Administrators (see each contract for the specific contact person or call BSO)	Acquisition Request BSO-47
Paper	Mandatory Contract	Stay Safe Supply	1-09-75-41B	Minimum of 40 cases (1 Pallet)	Acquisition Request BSO-47
Paper	Mandatory Contract	National Office Solutions	1-10-75-55	Not too exceed 39 cases	Acquisition Request BSO-47 or CAL-Card



Bureau for Private Postsecondary Education Procedure

Title: Procedures for Generating an Annual Fee Invoice for a New School	Supersedes: 2013-0083 July 19, 2013	Procedure #: 2013-0083
Procedure Owner: Administration Unit	Effective: July 19, 2013	Pages: 6 7
Issue Date: April 30, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that annual fees are invoiced and collected in accordance with Bureau for Private Postsecondary Education laws and regulations, State Administrative Manual procedures and Department of Consumer Affairs (DCA) policy.

Purpose: This procedure outlines the procedures for collecting annual fees from a newly approved private postsecondary education school.

Definitions:

Schools Automated Information Link (SAIL) – The data base that stores information on private postsecondary schools operating in California.

Productivity Benchmarks: Generating a new invoice will take from five to 10 minutes.

Procedures for Generating Annual Fee Invoice for newly approved school:

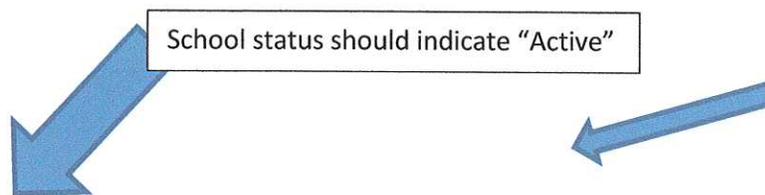
Pursuant to the California Code of Regulation section 74006 (a) An institution's annual fee is due within 30 days of the date on which the institution originally receives its approval to operate and each year thereafter on the anniversary of the date of the original approval.

The procedure is divided into two categories, Full Approval and Accredited Institution Approval.

Schools with Full Approval:

1. Within 30 days of the school received it's approval to operate, the Bureau will generate annual fee invoice and set up the school for future annual fee billing. The Bureau fiscal analyst shall log into SAIL.
2. Click on "Revenue Tracking" towards the bottom of the blue box on the left side of the screen.
3. Click on "Revenue Report Center" in the middle of the screen.
4. Refer to the middle column titled "Management Reports." Click on "Institutions Newly Approved (By Date).
5. Enter the range of dates (generally the first to the last day of a month).
6. Click on "Print Report."
7. Retrieve the report from the printer.
8. The computer screen will revert back to the "Revenue Tracking Report Center Screen."
9. Click on "Close" to return to the "Revenue Tracking" screen.
10. Click on "School Information" in the blue box at the left of the screen.
11. Enter the school code in the box at the top left of the screen and click "Go."
12. Verify the school status is appropriate to generate an annual fee invoice. See Table 1. Note: a school status of "Active-94905" refers to regional accreditation and as such are exempt from paying annual fees invoice.

Table: 1



General School Information For School Code #4303371
File - Schedule A Site Visit

S. A. I. L. *Schools' General Information*

Report Center | Add/View Comments | Save Work | Add School Item | @ A Glance | Back To Main

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: Status Date: Site Type: Main School Code:
(When the current status changes) **AUDIT** Institution Code: **AUDIT**

School/Institution Name:

Title IV Funding? OPE ID: Addressing Preference:

School Physical Address: **AUDIT** School Mailing Address:

County: Santa Clara CA Phone Number: Fax Number:

Accreditation Body/Agency (s): Web Address (URL Address): Assign Bureau Staff: Date Assigned:

Contact Info | Ownership | Custodian | Agent for Process | Branches/Satellites | Site Visits
Approval | Registrations | Religious Exemption | Other Exemptions | Programs | Enforcement | Revenue Tracking | Applications

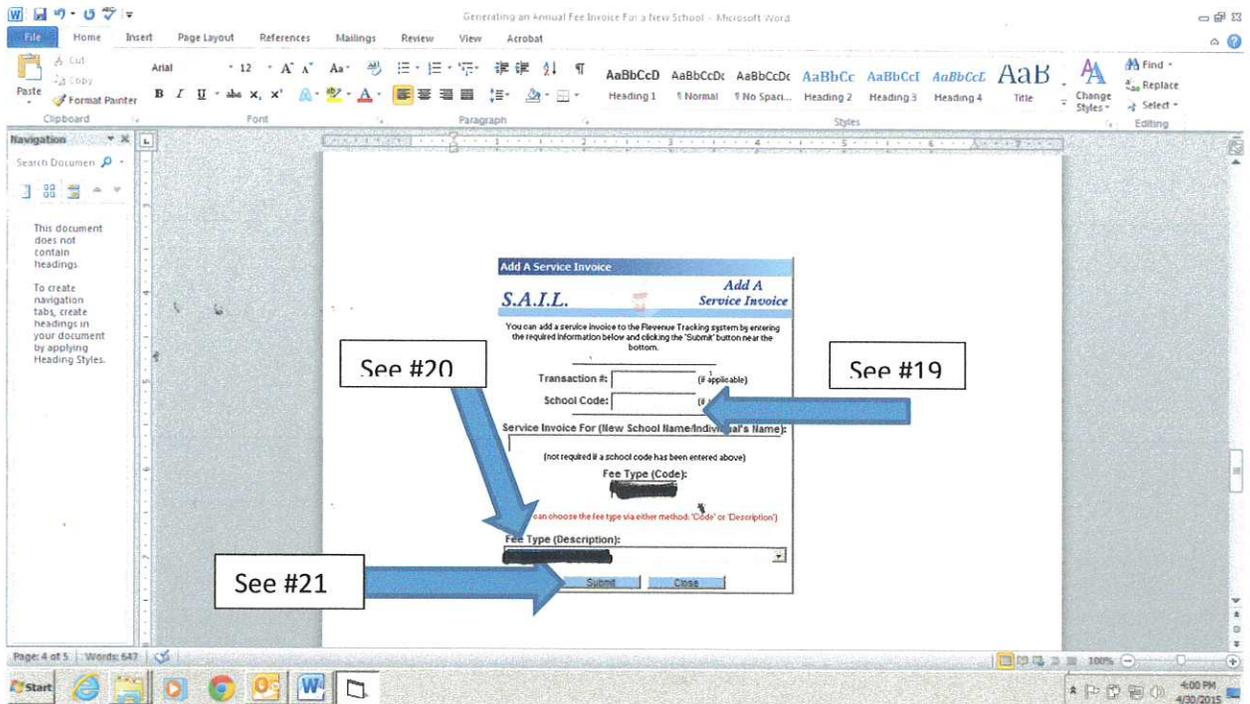
Institutional Approvals (past and present) for Institution Code # 4303371						
Approval ID	Approval Status	Approval Date	Expiration Date	Temp Expiration Date	Associated App	Active?
72332						

* Temp Expiration Date* only valid if the Approval Status is Temporary Approval

Windows taskbar: Start | Internet Explorer | Firefox | Chrome | Word | 3:37 PM 4/30/2015

See # 16

13. Click on "Return to Main." See Table 1.
14. Click on "Revenue Tracking" towards the bottom of the blue box on the left side of the screen.
15. Click on "Add Service Invoice" found in the middle of the page.
16. Enter the school code in the box titled "School Code." See Table 2.
17. Go to the drop down box titled "Fee Type (Description)" and choose "Annual 94930.5c(2.d.A) Inst." See Table 2.
18. Click "Submit." See Table 2.



19. Fill in the following information:
 - a. Due Date (1st day of the following month).
 - b. Delinquent Date (30 days from the due date).
 - c. Annual Fee Information (select the month the school was approved).
20. Click on “Save Work.”
21. Go to “Print Invoices” and click on “Print this AF Bill (Newly Approved).”
22. Process the invoice in accordance with procedure #2013-0087.
23. In order for this new school’s annual fee invoice to generate automatically in future years, the school must be added in SAIL.
24. Go to the Revenue Tracking Screen. Click on the word “Revenue Tracking” at the top left hand corner. There will be a Revenue Tracking –Set AF Billing Month dialog box appearing on the screen. In the dialog box, please enter the school code and also select the appropriate annual fee month. Once that is done, click on the “Save Billing Month” icon to save the annual fee month.

Revenue Tracking - Main

File Annual Reports Application Processing Cert of Authorization Enforcement Revenue Tracking School Information STRF Title38 Help

Revenue Tracking

1. Enter Transaction #:
(Example: 5614 or L45612)

2. Enter Invoice #:
(Example: 100002514)

- ▶ School Information
- ▶ Enforcement/Complaint
- ▶ Application Processing
- ▶ Annual Report
- ▶ S.T.R.F.
- ▶ COAFS / Agent Permits
- ▶ S.A.I.L. Net Main Site

S.A.I.L. NET
Schools Automated Information Link
Revenue Tracking Main Site

The Revenue Tracking Site welcomes Jessica Liu to the system.

Add Revenue 'Batch'

Close Revenue 'Batch'

Add Revenue 'Transaction'

Add 'Service Invoice'

Revenue Report Center

Single Click To Perform Action!

There is no current Revenue 'Batch' open.

Revenue Tracking - Set AF Billing Month

Enter School Code Here:

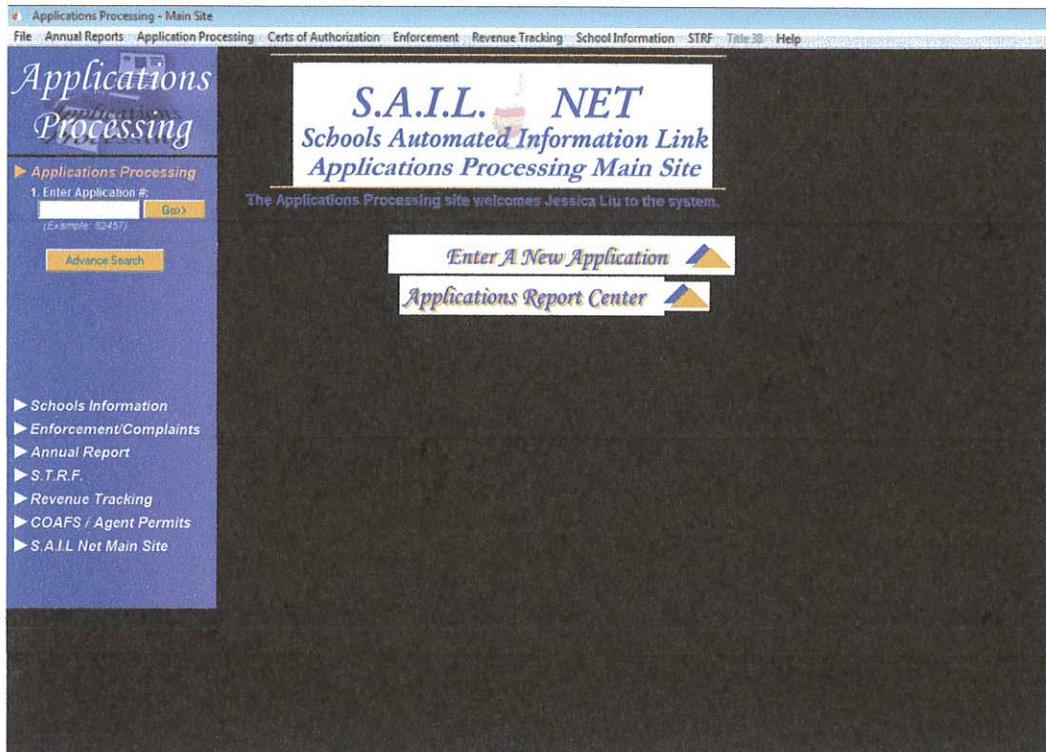
AF Billing Month:

25. Once the future annual fee month is set up, the process for setting up a new school for annual fee is completed.

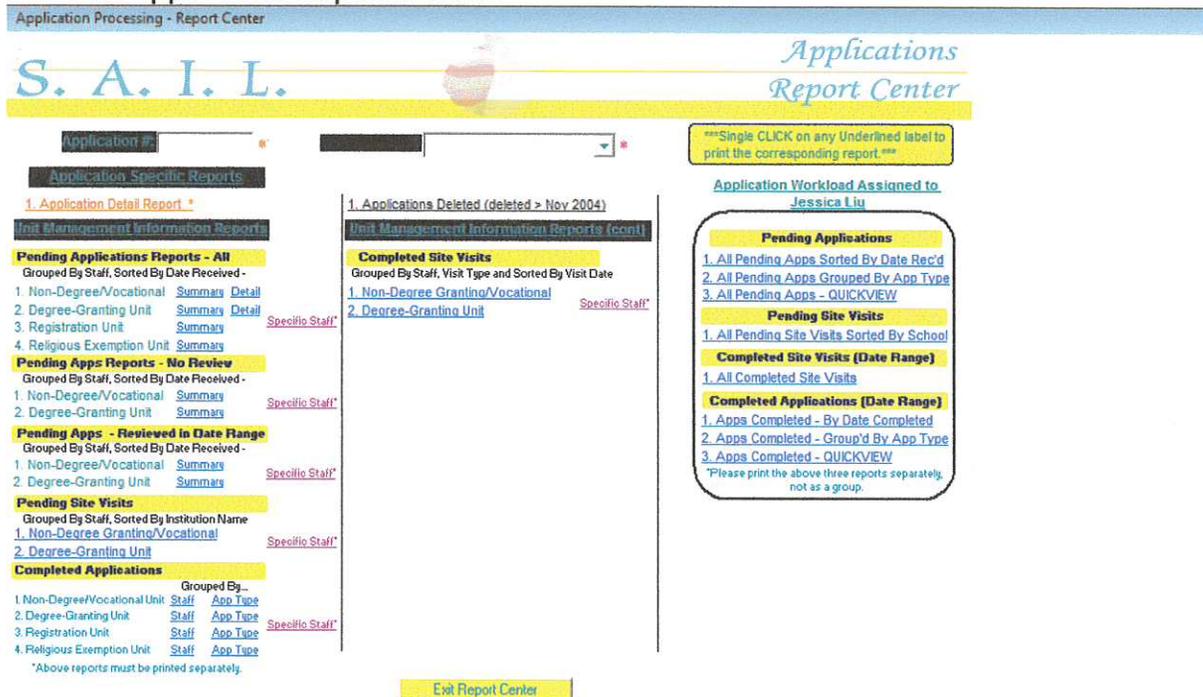
Schools with Accredited Institution Approval:

Schools with Accredited approval usually do not show up on the Newly Approved School List Report generated using the above method. To find the newly approved schools with Accredited Institution approval, please follow the below steps:

1. Go to the Application Processing screen.



2. Click on Application Report Center.



3. Go to "Completed Applications" on the lower left hand corner.

4. Click on Non-Degree/Vocational Unit group by [App Type](#). This will generate the completed applications for Non-Degree/Vocational Unit.
5. Also Click on Degree Granting Unit group by [App Type](#). This will generate the completed applications for Degree Granting Unit.
6. Once the reports are printed. They are organized by Analyst Names. Look at all completed application types that are label under: "Approval to Operate an Accredited Institution". Please note that not all applications approved under this category are newly approved schools. Look for the ones that are newly approved in SAIL.
7. Once the a newly approved schools are identified using this method, then follow the above procedures under Full Approval schools # 8-24 to create annual fee invoice and add future annual fee month in SAIL.
8. Mailed the newly approved annual fee invoices to schools (identified under both approval types) and keep copies for the Bureau.
9. Lastly give a copy of the newly approved schools lists of both types (Full Approval and Accredited Institution Approval) to the Enforcement Chief.

Title: Procedures for Posting Dishonored Checks in SAIL	Supersedes: 2013-0084 July 19, 2013	Procedure #: 2013-0084
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 25, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that checks that have been dishonored by a school's bank and returned to the Bureau for Private Postsecondary Education (Bureau) unpaid are posted in SAIL so that accounting processes are consistent with the State Administrative Manual and Department of Consumer Affairs (DCA) policy.

Purpose: This procedure outlines the process for posting returned checks to the schools revenue information in SAIL.

Definitions:

Dishonored check – A check that the payer's bank will not honor. Dishonored checks are most often due to insufficient funds in the payer's account or the account has been closed.

Bureau accounting liaison – The Bureau staff person responsible for all accounting related transactions and processes.

SAIL – An acronym for Schools Automated Information Link. SAIL is a data base that stores information on private postsecondary schools operating in California.

Productivity Benchmarks: Posting a returned check to the SAIL database will take the Bureau accounting liaison 5 minutes per check received.

Procedures for Posting a Dishonored Check to SAIL:

1. When a check is returned to the Bureau by the bank as unpaid, the Bureau accounting liaison shall immediately post the returned check to the school's revenue tracking file in SAIL.

2. The Bureau accounting liaison shall log into SAIL.
3. Enter the school's code in the box titled "School Code" at the top of the screen and click on "Go."
4. Click on the "Revenue Tracking" tab located towards the bottom right of the screen. Determine the invoice that is associated with the returned check and notate the transaction number. The transaction number can be located in the second to last column titled "Trans No."
5. Return to the Main Menu and click on "Revenue Tracking" found on the left side of the screen, fifth item down in the blue box.
6. Insert the transaction number in the box at the top left of the screen titled "Enter Transaction #" and click "Go."
7. On the Detail for Transaction screen (Table 1):
 - Click on the box titled "Dishonored."
 - Enter the date the check was dishonored in the box titled "Date Check Dishonored." This date can be obtained on the notice generated by the DCA Accounting Office that was attached to the returned check.
8. Click on the tab at the bottom of the screen titled "Save Work."

Table 1:

Detail for Transaction #188408 (All Access)

S.A.I.L. Revenue Tracking Transaction Detail

Transaction #: [redacted] Legacy Ledger #: [redacted] Batch #: [redacted]

Date Check Received: [redacted]
Check Logged In SAIL: [redacted]

Check Logged By: Mar Kyan Check Cash

Check From: Existing School Other School Code: [redacted]

Check Date: [redacted]
Check #: [redacted]
Check Amount: [redacted] DOLLARS

Make Payable To: Bureau For Private Postsecondary Education (BPPE)

Amount Allocated to the '305' Fund \$: [redacted]
Amount Allocated to the 'STRF' Fund \$: [redacted]

Memo: [redacted]

Dishonored: **See Step 7**
Date Check Dishonored: [redacted]

Link An Existing Transaction Create A Service Invoice

Transaction Balanced - 1 Invoice(s) for \$301.71

Invoice Date	Fee Description	Net Amount	School/Person Name (if diff than above)	AF Month	AF Year	STRF Quarter	STRF Year
[redacted]	[redacted]	[redacted]	[redacted]	September	2014		

Buttons: Back To Main, Save Work, Report Center, Add/View Comments, Add New Transaction, Print Transaction Detail

Title: Dishonored Check Processing Procedures	Supersedes: 2013-0085 July 19, 2013	Procedure #: 2013-0085
Procedure Owner: Administration Unit	Effective: July 19, 2013	Pages: 3
Issue Date: March 25, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that checks returned to the Bureau for Private Postsecondary Education (Bureau) by a school’s bank unpaid are processed in accordance with the State Administrative Manual and Department of Consumer Affairs (DCA) policy.

Purpose: This procedure outlines the process for collecting funds owed the Bureau, but payment was rejected by the school’s financial institution.

Definitions:

SAIL – an acronym for Schools Automated Information Link. SAIL is a data base that stores information on private postsecondary schools operating in California.

Productivity Benchmarks: Because this procedure can spread over a 90-day or longer period, it is not possible to accurately assess a productivity benchmark; however, each letter should take ten to 15 minutes to process. If the debt rolls over into the the debt collection process the time spent on collection efforts will be anywhere from two hours to eight hours before the collection effort is abandon.

Dishonored Check Processing Procedures:

1. All dishonored checks shall be processed in accordance with Procedure #2013-0084.
2. When the DCA Cashiering Unit receives notice of a returned check, the cashier assigned to the Bureau shall immediately take action to collect the funds.

3. The Bureau fiscal analyst shall immediately determine if the school has a pending application. If so, the Licensing Unit must be alerted to the dishonored check so that approval of the application does not occur until the debt is settled.
4. The DCA cashier shall send the first collection letter to the payer. The letter can be accessed by following this path: ~~C:\DPT\EDDPE ADMINISTRATIVE SUPPORT\Jessica Lira\Dishonored Check Notices.~~
5. Choose the applicable letter format and personalize it for the situation. Send the letter to the school and place a copy of the letter in suspense for a 30-day follow up. Send a copy of the letter to the Bureau fiscal analyst for Bureau records.
6. If after 30 days the school has not responded, a second letter is sent to the school. The letter can be accessed by following this path: ~~C:\DPT\EDDPE ADMINISTRATIVE SUPPORT\Jessica Lira\Dishonored Check Notices.~~
7. Choose the applicable letter format and personalize it for the situation. Send the letter to the school and place a copy of the letter in suspense for a 30-day follow up. Send a copy of the letter to the Bureau fiscal analyst for Bureau records.
8. If after 30 days the school has not responded, a third letter is sent to the school. The letter can be accessed by following this path: ~~C:\DPT\EDDPE ADMINISTRATIVE SUPPORT\Jessica Lira\Dishonored Check Notices.~~
9. Choose the applicable letter format and personalize it for the situation. Send the letter to the school and place a copy of the letter in suspense for a 30-day follow up. Send a copy of the letter to the Bureau fiscal analyst for Bureau records.
10. If after 30 days the school still has not settled the account, action shall be taken.
11. If the school has an Employer Identification Number (EIN) on file with the Bureau, DCA will attempt to collect the debt through the California Franchise Tax Board (FTB). The Cashiering Unit will forward the documentation to the DCA Accounts Receivable-Revenue Unit for referral to FTB.
12. If the school does not have an EIN, the Bureau will attempt to collect on the debt in-house.
13. Throughout the collection process, the Bureau fiscal analyst shall document in SAIL the current status of the collection efforts. To do so, the Bureau fiscal analyst shall log into SAIL.
14. Enter the school's code in the box titled "School Code" at the top of the screen and click on "Go."
15. At the top of the school's information page click on "Add/View Comments" then click "Add Comment" in the box that pops up. (Table 1).

Table 1:

S. A. I. L. Schools' General Information

Report Center Add/View Comments Add School Item @ A Glance Back To Main

Institution's Program Types: Vocational Degree Registered Title 38 Religious Exempt Exempt Residential Distance Learning

School Status: Active Status Date: Site Type: Main School Code: Institution Code: **AUDIT**

School/Institution Name: Title IV Funding? OPE ID: Addressing Preference: School Mailing Address: School Physical Address: County: Stanislaus Accrediting Body/Agency: Web Address (URL Address):

2411 School Co. tory

Schools/Institution - Comment History

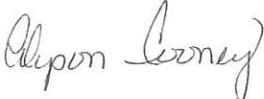
Add Comment OR View Comment History

For the Below School Code

Approval	Registrations	Religious Exemption	Other Exemptions	Programs	Et
Approval	Approval Status	Institutional Approvals (past and present) for Institution Co	Approval Date	Expiration Date	Te

* Temp Expiration Date* only valid if the Approval Status is Temporary Approval

16. The Bureau fiscal analyst shall update the comment box and then click "Close."

Title: Procedures for Clearing an Annual Fee Billed in Error	Supersedes: 2013-0086 July 19, 2013	Procedure #: 2013-0086
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that billing errors are efficiently and appropriately handled. To ensure that billing errors are processed in accordance with the State Administrative manual and Department of Consumer Affairs (DCA) policy.

Purpose: This procedure outlines the process for clearing an annual fee charge that was billed in error.

Definitions:

SAIL – acronym standing for Schools Automated Information Link. SAIL is the Bureau’s database that contains information on California private postsecondary schools.

Productivity Benchmarks: Clearing an annual fee billed in error will take 15 minutes to process.

Clearing Annual Fees Billed in Error Procedures:

1. Annual fee billing errors most typically occur when an exempt school is inadvertently bill an annual fee. The California Private Postsecondary Act of 2009 does not require schools that meet the criteria for exemption from licensure by the Bureau to submit an annual fee.
2. If a school claiming to be exempt contacts the Bureau and indicates that they were inadvertently billed an annual fee, the issue shall be researched and appropriate action taken.

3. To determine if a school is exempt, log onto SAIL and under the "Schools Information" enter the school's code in the appropriate box to access their school information.
4. At the top of the screen to the left is a box that indicates "School Status." If the box indicates that the school is "Exempt," then the school should not have been billed for an annual fee and correction is necessary.
5. Staying on this same SAIL page, click on the Revenue Tracking tab towards the bottom of the screen. This will bring up the invoice and payment history for the school.
6. In the column title "Invoice #" locate the invoice billed in error. Click on the arrow next to the invoice number and the invoice will print.
7. Return to the main SAIL screen. On the left side of the screen click on "Revenue Tracking."
8. Once on the Revenue Tracking screen, enter the invoice number in box #2.
9. On the far right of the screen check the box labeled "Bill in Error."
10. Click on the "Save Work" tab at the bottom of the screen.
11. Click on the "Add/View Comments" tab at the bottom of the screen. Notate here that the school is accredited and billed in error. Click on "Add Comment" to complete.
12. Print the Invoice Detail.
13. File the Invoice Detail by invoice number in the Billed in Error binder.

Title: Procedures for Generating Annual Fee Invoices	Supersedes: 2013-0087 July 19, 2013	Procedure #: 2013-0087
Procedure Owner: Administration Unit	Effective: July 19, 2013	Pages: 2
Issue Date: April 21, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that annual fees are invoiced and collected in accordance with Bureau for Private Postsecondary Education laws and regulations, State Administrative Manual procedures and Department of Consumer Affairs (DCA) policy.

Purpose: This procedure outlines the procedures for collecting annual fees from private postsecondary education schools.

Definitions:

Schools Automated Information Link (SAIL) – The data base that stores information on private postsecondary schools operating in California.

Productivity Benchmarks: The overall process will take approximately one week each quarter from beginning to end although Bureau staff will not be working on the project for much of that time. The Bureau fiscal analyst will spend approximately two hours each quarter coordinating the invoice process.

Procedures for Generating STRF Invoices:

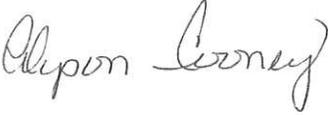
1. Each year, during the anniversary month of a school's initial approval to operate, the school is required to pay an annual fee. The annual fee is calculated at three-quarters of one percent of the school's annual revenues, but not to exceed \$25,000.00 annually. Additionally, a school shall submit \$1,000.00 for each branch it is approved to operate if applicable.
2. Payment is due on the 1st day of the month that the school received its original approval to operate.

3. Payments received after the 30th calendar day from the due date are subject to a 25% penalty fee. Payments received after the 90th calendar day from the due date are subject to a 35% penalty fee.
4. Before an annual fee is sent to the DCA Cashiering Unit for processing, it shall be reviewed by the fiscal analyst to ensure that the school completed the invoice properly and submitted the correct amount.
5. The school shall insert their fiscal month/year beginning and ending on the lines titled "Fiscal Year Begin" and "Fiscal Year End." This shall consist of 12 consecutive months. The fiscal year ending month shall not be after the annual fee month. For example, if a school's anniversary month/year is July 2015, then the fiscal year ending month shall be before July 1, 2015. If any of the following occur, the payment shall be returned to the school for correction:
 - The fiscal year section is left blank.
 - The fiscal year is incorrectly notated.
 - The fiscal year is shorter or longer than one year.
6. The school shall insert their annual gross revenue for the reporting year from their financial statement on the line titled "Annual Gross Revenue." This figure cannot be estimation, but shall be the actual annual gross revenue.
7. The annual gross revenue is multiplied by .0075 and the amount is inserted on the line titled "Institution Total".
8. If the school has one or more branch locations, then the total number of branch locations is inserted on the line titled "Number of Branch Locations." The number of branch locations is multiplied by \$1,000.00 and the resulting amount is inserted on the line titled "Branch Total." If the school does not have any branch locations, then this section is left blank. If the school inadvertently pays for branch locations, but does not have any branches, then the payment shall be returned for correction.
9. The number of branch locations can be found in SAIL. The fiscal analyst will log into SAIL. Enter the school code in the box titled "Enter School Code" at the top left. Click on "Go."
10. Click on the tab titled "Branches and Satellites." See Table 1 below.

Table 1:

11. The amount on the line titled "Institution Total" is added to the amount (if any) on the line titled "Branch Total" and entered on the line titled "TOTAL AMOUNT DUE."
12. Verify all of the calculations are correct.
13. If the school added a penalty fee it shall be calculated by multiplying the percentage (either 25% or 35%, whichever is applicable) by the sum of the Institution Total and Branch Total (Institution Total + Branch Total X .25 = Penalty Due). If the school failed to submit the requisite penalty or calculated the penalty incorrectly, a delinquent notice shall be generated. A sample delinquent notice can be accessed by following this path: [\[REDACTED\]](#)
[SUPPORT - Issuing a Delinquent Payment Notice](#)
14. Upon completion of the invoice review, the payments shall be provided to the Bureau Office Technician responsible for preparing checks for submission to the DCA Cashiering Unit.
15. The Office Technician will prepare the checks for submission to the DCA Cashiering Unit in accordance with Procedure # 2013-0064, Mail Processing Procedures.

Bureau for Private Postsecondary Education Procedure

Title: Revenue Transfer Procedures	Supersedes: 2013-0088 July 19, 2013	Procedure #: 2013-0088
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that revenue transfers are processed in accordance with the State Administrative manual and Department of Consumer Affairs (DCA) policy.

Purpose: This procedure outlines the process for transferring funds.

Definitions:

Revenue transfer – an internal process to move funds from one account to another.

SAIL – acronym standing for Schools Automated Information Link. SAIL is the Bureau’s database that contains information on California private postsecondary schools.

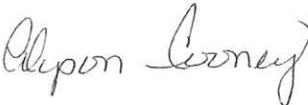
Productivity Benchmarks: A revenue transfer will take 30 minutes to one hour to process.

Revenue Refund Procedures:

1. Gather all of the necessary documents to support the transfer.
 - Download the Revenue Transfer Request form by following or clicking on this link: http://link.dca.ca.gov/office/accouting/revenue_trans.pdf
 - Print a copy of the SAIL payment history report. Go to SAIL, click on the Revenue Tracking tab. To the left of the revenue table is a button labeled “Print Revenue History,” click on this button.
 - Collect any other applicable information to support the revenue transfer.

2. Complete the Revenue Transfer Request as follows:
 - a. From: Enter Bureau for Private Postsecondary Education.
 - b. Date: Enter the date the form is prepared.

- c. Contact Person's Information: Enter the name, telephone number, and email address of the person completing the revenue transfer form.
 - d. Transfer From: Enter the index, PCA, account number, suffix, and amount you want to transfer from.
 - e. Transfer To: Enter the index, PCA, account number, suffix, and amount you want to transfer to.
 - f. Reason for Transfer: Provide an explanation to justify the request. Specify the name of the school, transaction number, and invoice number that the transfer affects.
 - g. RC Number: Enter the number from the Report of Collection (RC) that the funds were cashiered.
 - h. Deposit Date: Enter the deposit date listed on the RC.
 - i. Signature of Authorized Person: Submit the completed form and accompanying documents to the Administration Unit manager for approval.
3. Upon approval of the request, make two copies.
 4. Submit the original Revenue Transfer Request and one additional copy to the DCA Accounts Receivable/Revenue Unit.
 5. Place the remaining copy in the pending file until the completed Revenue Transfer Request is returned from DCA.
 6. When the completed document is returned from DCA, it can be filed. If a completed copy is not received within 30 days, follow up with DCA.

Title: Dishonored Check Reimbursement Procedures	Supersedes: 2013-0089 July 19, 2013	Procedure #: 2013-0089
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 25, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that reimbursement for checks that have been dishonored by a school's bank and returned to the Bureau for Private Postsecondary Education (Bureau) unpaid are processed in accordance with the State Administrative Manual and Department of Consumer Affairs (DCA) policy.

Purpose: This procedure outlines the process for preparing the reimbursement funds for cashiering to ensure the funds are linked with the appropriate fund.

Definitions:

Dishonored check – A check that the payer's bank will not honor. Dishonored checks are most often due to insufficient funds in the payer's account or the account has been closed.

Bureau accounting liaison – The Bureau staff person responsible for all accounting related transactions and processes.

SAIL – An acronym for Schools Automated Information Link. SAIL is a data base that stores information on private postsecondary schools operating in California.

Productivity Benchmarks: Processing a returned check fee will take the Bureau accounting liaison 10 minutes per fee received.

Procedures to Process a Dishonored Check Reimbursement:

1. At the time a check is returned to the Bureau by the bank as unpaid, the Bureau accounting liaison will post the information in SAIL in accordance with Procedure

#2013-0084. In addition to the original amount of the check, a processing/penalty fee will be charged to the school for the dishonored check.

2. Upon receipt of the processing/penalty fee from the school, the Bureau accounting liaison shall stamp the payment with a transaction number, then post to SAIL. The transaction number is issued by the Bureau's accounting liaison.
3. To post, go to SAIL and click on "Revenue Tracking" found on the left side of the screen, fifth item down in the blue box.
4. Click on "Add Revenue Transaction" found center screen, third item down and enter the transaction number.
5. Enter the payer and the payment information.
6. Click "Link an Existing Invoice."
7. Click on the applicable invoice pertaining to the dishonored check.
8. Click "Yes" in the pop up box to open up the detailed screen.
9. Fill in the amount of the payment.
10. Click on "Save" and exit from SAIL.
11. As a double check to ensure the dishonored check has been correctly cleared, once again go to SAIL and click on "Revenue Tracking" found on the left side of the screen, fifth item down in the blue box.
12. Then enter the transaction number from step #2 above issued by the Bureau's accounting liaison, and click on "Go".
13. If the transaction has been correctly cleared, the screen will indicate the following:
 - The box titled "Dishonored Check" is marked.
 - The date the check was dishonored is populated.
 - The screen indicates "Cleared by Transaction #XXX, 0 Invoices(s) for \$0.00 Dishonored**Dishonored."

Title: Procedure to Return a Check to Sender	Supersedes: 2013-0090 July 19, 2013	Procedure #: 2013-0090
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that checks submitted in error or received erroneously are returned to the sender in accordance with the State Administrative Manual and Department of Consumer Affairs (DCA) policy.

Purpose: This procedure outlines the process for returning checks to the sender.

Definitions:

Productivity Benchmarks: Returning a check to the sender will take 15 minutes per check.

Procedures to Return a Check to the Sender:

1. Checks are often received from schools that are unable to be cashiered for various reasons. The most common reasons necessitating a check to be returned are:
 - A check was submitted indicating that it was for STRF fees, but the invoice was not included.
 - A check was submitted for STRF fees; however the fees were incorrectly calculated.
 - A fee was not required.
 - A duplicate payment received.
2. Review the checks received in the mail each day to determine which, if any, need to be returned to the sender.
3. Retrieve the binder labeled Returned Check Log from the desk of the fiscal analyst.

4. Complete a Returned Payment Notice (Form 99J-370) as depicted on the sample below. A supply of this form is maintained in the binder and can be reordered from the DCA Business Service Office.

The image shows a sample of a "RETURNED PAYMENT NOTICE" form from the State of California, Department of Consumer Affairs. The form is titled "STATE OF CALIFORNIA RETURNED PAYMENT NOTICE" and includes a reference number "No. 220688". It contains several fields for user input, including a date field, a reason for return field, a field for the school's name and address, and a section for check details such as "Remittance attached", "Business Check", "Personal check", "Money order", "Other", "Dated", and "Amount". The form also includes a signature line for the Bureau staff person processing the returned check.

5. Draft a letter to the school explaining the reason for returning the check. The letter template can be accessed by following this path: [SUPPORT > Training > Returned Checks](#).
6. Complete a U.S. Postal Service Certified Mail post card and receipt. These can be obtained from the mail station in the Administration Unit.
7. Make a photo copy of the check and the letter.
8. Attach the letter to the white copy of the Returned Payment Notice and the original check. Mail all three documents to the school by Certified Mail.
9. Accessing the Returned Check Log maintained in the binder, record the following:
 - The date the check was received.
 - The name of the school that submitted the check.
 - The amount of the check.
 - The check number.
 - The initials of the Bureau staff person processing the returned check.
 - The date the check was returned.
10. Assemble the copy of the letter, yellow and pink copy of the Returned Payment Notice, and certified mail receipt and place them in the binder.
11. Within a few days the U.S. Postal Service return receipt will arrive in the mail. Attach the receipt to the appropriate documentation in the binder.

Title: Procedures for Travel	Supersedes: None	Procedure #: 2013-0094
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: September 3, 2013	Approved By: Joanne Wenzel, Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that all State DCA travel adheres to the DCA State guidelines and make sure BPPE has proper documentation and posting of funds.

Purpose: The purpose of this procedure is to outline the DCA Travel guidelines and ensure that BPPE processes are followed consistently and accurately.

Definitions:

CalATERS Global Account – CalATERS Global is a web-based application that allows State employees and non-State employees to process travel advances and expense reimbursements online.

Caltravelstore – The Statewide Travel Program provides the most economical rates available through the use of contracted travel-related services for airfare, car rentals, travel, and fuel payment system. It is the only authorized Travel Management Service Provider for all State of California Government Travel.

Productivity Benchmarks: The time a staff traveler spends on planning the trip and making recommendation to his/her manager varies depending on the reason for travel. The time a staff traveler spends on booking airfare, car rentals and hotels on the Caltravelstore can take up to 2 hours. As for the time a staff travel spends on requesting travel advance and expense reimbursement on CalATERS can take up to 45 minutes.

Procedures for Travel:

1. Prior to any travel the staff traveler needs to recommend to a manager his/her travel plans including dates, times and estimate of costs.

2. Once approval is obtained from the manager, the staff traveler scheduled the travel with the school. Then make all travel arrangements such as airfare, car rental and hotel through the Cal Travel store at [http://www.caltravelstore.com/](#). Contact the Bureau's Travel Liaison for User ID and temporary Password.
3. The prior to travel, the staff traveler can request for a travel advance cover the cost or wait until after the trip to file an expense reimbursement.
4. Travel advances and reimbursements are both requested through the CalATERS Global system. Therefore, all staff travelers should have a CalATERS Global account set up with the travel unit.
5. To establish a CalATERS Global account the staff traveler completes a CalATERS Global Training Request form available on the DCA intranet [http://www.dca.gov/officeoftravel/](#) and scan e-mail it to the Travel Unit at [CalATERS@dc.gov](#) to request a CalATERS Global User ID.
6. With the CalATERS Global ID, the staff traveler signs on to the CalATERS Global system through the following website [http://www.dca.gov/officeoftravel/](#).
7. Please note that on the DCA intranet, under the Travel/CalATERS tab it has a lot of useful information regarding travel and the required forms. [http://www.dca.gov/officeoftravel/](#)
8. Upon 3-5 business days of returning from a trip, the staff traveler should go on to the CalATERS Global system to clear their travel advance or file for expense reimbursement.
9. Print the transmittal sheets and attached original receipts. Then route then entire package to the approver for signature.
10. Make 2 copies of the signed transmittal sheets and receipts. One copy is submitted to the fiscal analyst for review and the one for the staff traveler to keep.
11. Once the Fiscal Analyst has reviewed transmittal sheets and receipts, the Office Technician will then file the entire package in the Bureau's travel binder.

Bureau for Private Postsecondary Education Procedure

Title: Employment Application Processing Procedures	Supersedes: 2014-0001 July 1, 2014	Procedure #: 2014-0001
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 4
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: Bureau for Private Postsecondary Education (Bureau) support staff assigned the task of opening incoming mail, are responsible for ensuring that Employment Applications (STD 678) and accompanying documentations submitted in response to vacant position recruitment efforts are processed in accordance with Department of Consumer Affairs' (DCA) policy and procedure and State of California Law.

Purpose: Opening, collating and logging incoming employment applications and attachments in an organized and systematic manner will ensure that the Bureau is in compliance with applicable policy, laws and rules. Should there be an appeal to the hiring process; the Bureau will have the necessary documentation to defend its position upon request by the DCA Office of Human Resources or the California Department of Human Resources.

Definitions:

Employment application – The standard form used by all State of California departments to solicit interest in vacant positions and examinations.

VPOS – The recruitment document resulting from an advertisement placed on the California Department of Human Resources' data base announcing an available position.

Office of Human Resources – The office within the DCA charged with ensuring Bureau employees' personnel and human resources needs are administered in accordance with policy, laws and rules.

Certification list – The official "list" that indicates eligibility on an employment list for the classification being recruited.

Bureau Human Resources Liaison – The Bureau analyst responsible for interacting with the DCA human resources staff on all human resources matters pertaining to Bureau employees.

Productivity Benchmarks: Although the total time spent each month may vary depending on the overall number of vacancies the Bureau experiences in a given month, once fully trained on this task, support staff should spend no more than 30 minutes per day (11 to 12 hours per month) opening applications received via United States mail and interoffice mail, organizing the documents, and logging the applications on to a standardized spreadsheet.

Procedures for Processing Incoming Employment Applications:

1. Using an expandable folder, create a file for each vacant position that the Bureau is accepting applications.
2. Collect the Employment Applications (STD 678) and attachments received in the mail.
3. Organize the applications into groups by position being advertised.
4. Within each group, complete the following:
 - a) Remove any unneeded/unnecessary documents submitted by the applicant. See Attachment A.
 - b) Organize the documents in the prescribed order. See Attachment A.
 - c) Arrange the applications in alphabetical order.
 - d) On your computer, locate the standardized spreadsheet by following this path:
[G:\Admin\Recruitment\Hiring File\Applications\Application Spreadsheet](#)
 - e) Save the spreadsheet in the appropriate folder by following this path:
[G:\Admin\Recruitment\Hiring File\Applications\Units](#). Click on the current fiscal year. Click on the appropriate Unit. Save the spreadsheet using the position number.
 - f) For each application received, insert the name of the applicant and the day the application was date stamped. The name should be last name, first name. The names are to be organized on the spreadsheet in alphabetical order.
5. Within approximately one week after the final filing date of the VPOS, the DCA Office of Human Resources will forward a copy of the examination certification list and the applications of those that responded interested in the position. If these documents are not received within one week, contact the DCA Office of Human Resources, Examination Unit, to inquire the status.
6. Upon receipt of these additional applications, follow the steps in number four above.
7. Approximately one week after the final filing date, the folder containing all of the applications shall then be turned over to the hiring manager.

8. Should any additional applications come in, the application, along with the envelope, shall immediately be given to the hiring manager.
9. Occasionally, a hiring manager may request to see the applications prior to the final filing date. It is permissible for the manager to "borrow" the folder containing the applications under the condition that the entire folder is returned prior to the end of the day or sooner. The hiring manager may make copies of any applications, but may not remove any applications from the folder. If the hiring manager is requesting an exception to this procedure, then he/she shall be directed to the Deputy Bureau Chief to seek approval.

ATTACHMENT A

Applications (STD 678) and accompanying documents received for vacant positions shall be collated in the following order:

1. Application
2. Resume
3. References
4. Statement of Qualifications
5. Diploma(s)/transcripts
6. Exam results
7. Cover letter
8. Letter(s) of reference/recommendation
9. Probation Reports/Performance Evaluations
10. Training certificates
11. Any additional documents not mentioned above.
12. Envelope (only keep if the date stamp is after the final filing date)

Note: the above documents may or may not be included within an applicant's application package.

The following documents, if included with an application package, shall be removed and appropriately (recycled, discarded, shred, etc.) disposed of:

- Envelopes (only keep if received after the final filing date).
- Ethnicity Questionnaire
- Instruction page from the application
- Employment History pages that the applicant left blank
- Copy of the VPOS/job announcement
- Blank sheets of paper

Bureau for Private Postsecondary Education Procedure

Title: Closing Recruitment and Hiring Files Procedures	Supersedes: 2014-0002 May 15, 2014	Procedure #: 2014-0002
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 3
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Administration Unit is responsible for ensuring that recruitment and hiring documents are compiled and retained in accordance with Department of Consumer Affairs' (DCA) policy and State of California Law.

Purpose: Collecting, organizing and logging all of the pertinent recruitment and hiring documents for each recruitment effort will ensure that the Bureau for Private Postsecondary Education (Bureau) is in compliance with applicable policy, laws and rules. Should there be an appeal to the hiring process; the Bureau will have the necessary documentation to defend its position upon request by the DCA Office of Human Resources or the California Department of Human Resources.

Definitions:

Bureau Human Resources Liaison – The Bureau analyst responsible for interacting with the DCA human resources staff on all human resources matters pertaining to Bureau employees.

VPOS – The recruitment document resulting from an advertisement placed on the California Department of Human Resources' data base announcing an available position.

Certification – The official documentation that indicates eligibility on an employment list for the classification being recruited.

Productivity Benchmarks: Although the total time spent may vary depending on the overall number of vacancies the Bureau experiences in a given month, once fully trained on this task, the Bureau Human Resources Liaison (Liaison) should spend no more than one hour collecting, organizing and documenting a single closed recruitment file.

Procedures for Closing a Recruitment/Hiring File:

1. Within ten business days of the completion of the hiring process, the hiring manager shall submit all recruitment and hiring documents to the Liaison for processing and final disposition.
2. The Liaison shall compile the following documents, in this order, into an expandable file folder:
 - a. Cover sheet, placing a check mark in the space next to the included documents and if applicable, an explanation why any pertinent documents are not included. The cover sheet can be found using the following path: [\[REDACTED\]](#)
 - b. Completed Request for Personnel Action form (HR-01). It is not necessary to include the attachments.
 - c. VPOS.
 - d. Certification information received from DCA Selection Services.
 - e. The Screening Criteria created by the hiring manager. Although formats may vary, ensure the document contains a minimum of the following:
 - i Classification.
 - ii Candidate listing.
 - iii Date application was received.
 - iv Screening categories that include rating scores.
 - v Screening criteria that explains how those that were invited for an interview were selected, for example, "Interview candidates with a final score of seven (7) or above and have a background in social media and outreach."
If the document submitted by the manager does not meet the criteria above, return the document to the manager along with this procedure memo for correction.
 - f. Compile all of the applications (do not include the applications from the candidates that were interviewed, they will be addressed in Step 2h below) received into one batch.
 - i Ensure that all of the unnecessary documents submitted by the applicant have been removed from the applications. Such items include, but are not limited to, blank sheets of paper, ethnicity questionnaires, unused experience pages, copies of the VPOS, and envelopes. Envelopes should ONLY be saved if the application is date stamped AFTER the final filing date and the candidate was disqualified from interview due to the late application.

- ii Ensure that the applications have been alphabetized.
 - g. Interview Schedule that includes the names of those selected for an interview and the date and time of their interview.
 - h. Applications of interviewees using the same process as Step 2f above. Also attach the signed Release of Personnel/Attendance Information form (HR-49), interview notes of the panel, reference check responses, personnel file review results, other documentation submitted by the candidates at the time of his/her interview (letters of reference, writing samples, etc.), and any other documents pertinent to the selection process.
 - i. Interview questions and evaluation criteria used to assess each candidate.
 - j. Notice of Appointment (HR-03).
3. Label the expandable file folder with the fiscal year, classification, position number, and Request for Personnel Action number. The label should read and appear as follows:
- FY XX/XX
 - Classification Title
 - 644-XXX-XXXX-XXX
 - RPA # 644-XXX
4. File the entire recruitment folder(s) by fiscal year, then alphabetically by classification, in the designated file cabinet.
5. These files must remain locked at all times as the applications contain confidential applicant information. In addition, interview questions are confidential because they are often reused, so in order to keep them as confidential as possible to ensure a competitive process, they shall remain in a locked cabinet.

Bureau for Private Postsecondary Education Procedure

Title: Position Control Procedures	Supersedes: 2014-0003 May 15, 2014	Procedure #: 2014-0003
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 3
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that Bureau for Private Postsecondary Education (Bureau) position years (an authorized and funded position) are reconciled with the State Controller's report each month.

Purpose: To ensure that personnel transactions have been correctly keyed as well as safeguard positions from being abolished in accordance with Government Code Section 12439.

Definitions:

Position Year – A position that is authorized and fully funded in the Governor's budget. A position year is commonly referred to as a PY.

Personnel Transaction – The process of electronically keying employee and/or position information into the State Controller's Office automated system.

Government Code Section 12439 – The law requiring the State Controller to abolish positions that are vacant six consecutive pay periods.

Bureau Personnel Liaison – The Bureau analyst responsible for interacting with the Department of Consumer Affairs' (DCA) personnel staff on all personnel matters pertaining to Bureau employees and positions.

Management Information Report System (MIRS) – A monthly report from the State Controller's Office that identifies each PY assigned to the Bureau and its current status.

DCA Budget Analyst – A DCA staff person within DCA Fiscal Operations responsible for budget issues related to the Bureau.

Office of Human Resources – The office within DCA charged with ensuring the human resources needs of Bureau employees are administered in accordance with policy, laws and rules.

Position Control Analyst – A DCA staff person in the DCA Office of Human Resources responsible for issues related to PYs.

Classification and Pay Analyst – A DCA staff person in the DCA Office of Human Resources responsible for classification issues related to the Bureau.

Productivity Benchmarks: Once fully trained on this task, the Bureau Personnel Liaison (Liaison) should spend no more than two hours per month on the reconciliation of Position Years (PYs). On occasion, it may take an additional three to five hours depending on the severity of any discrepancies. In addition, the addition of new PYs or deletion of expiring PYs may require an additional one to two hours annually.

Procedures for Monthly Reconciliation of Positions:

During the first week of each month, the Liaison will receive a MIRS Report from the DCA Office of Human Resources MIRS Coordinator. The MIRS Report lists all Bureau PYs and associated information. The Bureau Personnel Liaison shall reconcile the current Bureau organization chart with the MIRS Report within five working days of receipt of the report.

To reconcile:

1. Print the current organization chart. Cross off all of the positions that are not PYs i.e., 907 blanket positions, 999 blanket positions, new positions, etc. Count the positions remaining on the organization chart. The number of remaining positions should match the number of authorized positions, which currently stands at 76. The DCA Budget Analyst assigned to the Bureau can confirm the current number of authorized positions at any time.
2. If the number of positions remaining on the organization chart does not equal the current PY count, further research must be conducted to determine where the discrepancy originated. Once determined, take appropriate steps to correct the discrepancy. If applicable, correct the master organization chart located on the shared drive.
3. Utilizing the MIRS Report received from DCA Office of Human Resources, match each position on the report to the corresponding position on the organization chart. Merely placing a check mark next to each position number on the organization chart and another check mark on the corresponding position number on the MIRS Report is sufficient.

4. Continue this process until you have worked your way through the entire MIRS Report. Highlight any discrepancies on the raw data report as you go, but don't stop to research them. Discrepancies may resolve themselves as you work your way through the process.
5. Highlight any positions on the organization chart that do not have a checkmark next to the position number.
6. All of the highlighted position numbers on both documents are discrepancies and need to be researched and corrected. You will find that most of the discrepancies are the result of changes we have sent forward to the DCA Office of Human Resources and they have not yet keyed the personnel transaction. These are not true discrepancies unless they remain a discrepancy through two cycles of this process. If that happens, it is possible that the DCA Office of Human Resources has not keyed the transaction correctly or not keyed it at all. As you work your way through both documents, make notes on the documents that may later be helpful in reconciling the discrepancies.
7. Consult the previous month's MIRS Report reconciliation documents to see the status of the position the previous month. Sometimes the previous report will hold a clue (here's where your notes may prove useful) to why there is a discrepancy this month. Previous reports can be located in a binder on the Liaison's desk titled "Position Control."
8. Any discrepancies that cannot be explained and corrected from our end need to be immediately brought to the attention of the DCA Classification and Pay Analyst. Together the Liaison and DCA Classification and Pay Analyst must determine the discrepancy and correct it.
9. Upon reconciliation of the MIRS Report, the Liaison shall review the column on the report titled "MONTHS VACANT." In order to avoid losing positions to Government Code 12439, no positions in this column shall show being vacant six or more months. If there is a position that appears to be nearing, at, or past six months, immediately consult the DCA Classification and Pay Analyst for assistance. There are exceptions to the "six month vacancy rule," but only the Classification and Pay Analyst can determine with certainty if the vacancy is exempt from Government Code 12439.

Title: New Employee Orientation Procedures	Supersedes: 2014-0004 May 15, 2014	Procedure #: 2014-0004
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 3
Revision Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that Bureau for Private Postsecondary Education (Bureau) employees are provide the information, tools and resources pertaining to their employment status and necessary for successful performance in their new position.

Purpose: To guide the Bureau Human Resources Liaison as he/she goes through the hiring process with new employees, ensuring that every new employee is provided accurate and consistent information in a timely manner.

Definitions:

Bureau Human Resources Liaison (Liaison) – The Bureau analyst responsible for interacting with the Department of Consumer Affairs’ (DCA) Human Resources staff on all human resources/personnel matters pertaining to Bureau employees.

Office of Human Resources – The office within the DCAs charged with ensuring Bureau employees’ personnel and human resources needs are administered in accordance with policy, laws and rules.

Personnel Services Specialist – A staff person in the DCA Office of Human Resources assigned to process all Bureau employees’ personnel documents.

Productivity Benchmarks: The time spent performing this task will vary depending on the number of new employees appointed each month. Each new employee orientation will take from one to two hours to complete. In addition, the Liaison is responsible for assembling an ample supply of new employee information packets. This can be done on a quarterly basis and will take approximately four hours.

Procedures for Conducting a New Employee Orientation:

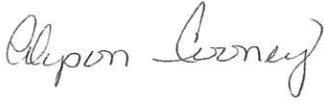
1. New Bureau employees shall be directed to report to his/her immediate supervisor on his/her first day. Prior to the new employee's first day, the Liaison will provide the new employee's supervisor with a current duty statement and an Essential Functions Health Questionnaire, STD 910. The Liaison will instruct the supervisor to review the duty statement with the employee and then have them complete the STD 910. The supervisor shall return both documents to the Liaison for processing.
2. Following a brief introduction and orientation by the supervisor, the new employee shall be introduced and turned over to the Liaison in order to complete the critical and time sensitive personnel documents.
3. In a quiet and confidential room, the Liaison will provide the new employee with a folder containing the required informational and personnel documents related to their employment. The Liaison will review all of the documents with the new employee, explaining their purpose. These documents should be completed during this orientation; but no later than within two working days.
4. The Liaison shall retain a copy of the documents from Part 2 of the 17 or 17A and forward the originals to the DCA Office of Human Resources assigned DCA Personnel Services Specialist.
5. Also included within the folder are three additional forms (Annual Leave – Sick Leave/Vacation Election, HR-38; Verification of Hiring Relatives, HR-04; and Military Service Declaration, STD 912). These three documents must be completed and submitted within five working days. It is advisable that the new employee complete these three documents during orientation if possible. If completed during the orientation, then retain a copy and forward the originals to the DCA Personnel Services Specialist along with the forms from Part 2 of the HR 17 or HR 17A.
6. Advise the new employee to review the policies listed in their handbook on line and then print, complete, and return the acknowledgements only (there is no need to print the policies as they can be accessed at any time on line) to the Liaison within five working days. A listing of these policies can be found on page 7 and 8 of the handbook.
7. Upon completion of the personnel forms, the Liaison shall accompany the new employee back to their supervisor.
8. The Liaison shall create a Bureau personnel file for the new employee. A copy of the collected documents shall be placed in the file. The originals of these documents shall be delivered to assigned DCA Personnel Services Specialist within two working days of the employee's start date.
9. If the new employee has not turned in their final paperwork on or about the third working day after their start date, the Liaison shall contact the new employee to

see how he/she is coming along completing the required documents and ask if he/she needs any assistance. Remind him/her of the required due dates.

10. Upon receipt of the remaining documents from the employee, the Liaison shall place a copy in the Bureau personnel file and prepare the originals for submission to the assigned DCA Personnel Services Specialist.
11. By the end of the new employees fifth working day, the Liaison shall have completed Part 1, Part 2, Part 3, Part 4, Part 5, and Part 6 of the HR-17 or HR-17A.
12. By the end of the new employee's fifth working day, the Liaison will meet with the new employee's supervisor and review Part 7 and Part 8 to ensure completion of the items.
13. If the new employee is supervisory, the Liaison, in conjunction with the Deputy Bureau Chief, will complete Part 9 and Part 10 of the HR 17 or HR 17A.
14. The Liaison and the new employee's supervisor will meet with the new employee in a quiet and confidential place and review the HR 17 or HR-17A.
15. Both the new employee and the supervisor shall sign and date the HR-17 or HR-17A.
16. The Liaison will retain a copy of the HR-17 or HR-17A in the employee's Bureau personnel file and then send the completed form along with the remaining documents to the DCA Office of Human Resources.
17. The Liaison is responsible for ensuring an adequate supply of new employee folders and booklets are on hand at all times. New employee orientation information and documents are located at [REDACTED]



Bureau for Private Postsecondary Education Procedure

Title: Requesting Changes to the Bureau Web Site Procedures	Supersedes: 2014-0005 June 1, 2014	Procedure #: 2013-0005
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure updates to the Bureau’s web site are in accordance with Department of Consumer Affairs (DCA) policy and State requirements. To insure that information contained on the Bureau web site is accurate and current.

Purpose: This procedure outlines the process for requesting changes to the Bureau’s web site.

Definitions:

DCA Internet Team – The staff of the DCA Office of Information Services (OIS) charged with the responsibility of maintain the DCA web site.

Outreach analyst – The Bureau analyst charged with the responsibility for ensuring the web site is up-to-date and accurate at all times.

Productivity Benchmarks: The time spent by the Outreach analyst on this task will vary greatly depending on the complexity of the request. A simple change will take no more than a total of 30 minutes, where a complicated change may take up to two days (16 hours) to research and implement.

Procedures for Requesting Changes to the Bureau’s Web Site:

1. All requests for additions, deletions, updates, or changes to the Bureau’s web site shall be approved by the Chief of the unit responsible for the information.

2. Staff shall submit their request via email to their supervisor for approval. If approved, the supervisor shall forward the request to the Chief for final approval.
3. If approved, the Chief will forward the request to the Administration Unit, Outreach analyst. The request shall contain:
 - a. A brief description of the change(s) being requested.
 - b. Proposed language shall be in red with current language struck out where applicable.
 - c. Date the change needs to be made (allow at least 10 working days).
 - d. Web address where the change is to be made.
 - e. Any attachment(s) to be uploaded (if applicable).
4. The Outreach analyst will review the request and if he/she has any concerns, comments, or questions, will work with the requestor to resolve.
5. The Outreach analyst shall submit the documentation regarding the change(s) to the Administration Unit manager for approval.
6. Upon approval, the Outreach analyst will email the approved change to the DCA Internet Team for implementation.
7. The DCA Internet Team will notify the Outreach analyst when the request has been completed.
8. The Outreach analyst will ensure the request has been properly posted to the web site and then notify the requestor that the request has been implemented.

Title: FasTrak Procedures	Supersedes: 2014-0006 October 28, 2014	Procedure #: 2014-0006
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 3
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that all Bureau for Private Postsecondary Education (Bureau) employees using FasTrak, are using it in accordance with FasTrak and State mandated requirements.

Purpose: This procedure outlines the FasTrak process.

Definitions:

FasTrak – An electronic toll collection system that allows drivers to electronically pay tolls on California’s bridges and toll roads without stopping.

Transponder – A device attached to the inside front window of a vehicle that electronically bills the user when using a toll road or bridge so that the vehicle does not have to stop at the toll booth.

Productivity Benchmarks: The process for checking out a FasTrak transponder will take the user approximately five minutes.

The process for replenishing the transponder will take approximately 15 minutes on an as needed basis.

The process for auditing the monthly FasTrak statement will take 15 to 30 minutes each month depending on the accuracy of the statement.

Procedures When Using FasTrak:

1. The Administration Unit manager (manager) is responsible for maintaining the FasTrak transponders and the record keeping associated with FasTrak usage.
2. The manager will provide the Bureau user with the FasTrak Disclaimer/Acknowledgement form (copy attached).
3. The user will complete and sign the acknowledgement document. The acknowledgement document describes the unauthorized use, permitted use, and violations.
4. The manager will verify the information on the form is complete.
5. The manager will note on the FasTrak Check In/Out Log the user's name, check out date, FasTrak transponder number, and have the employee sign the log.
6. The manager will provide the FasTrak transponder to the user.
7. Upon return to the office, the user will immediately return the FasTrak transponder to the manager.
8. The manager will verify the correct FasTrak transponder is being turned in and note the check in date on the log.
9. The FasTrak transponder will be immediately secured in a locked cabinet.
10. Each month the manager will receive a FasTrak statement in the mail. The manager will review the statement and compare the charges to the Bureau's FasTrak Check In/Out Log to ensure the charges are accurate. If accurate, the statement is filed in the FasTrak file maintained in the manager's desk.
11. If the statement is not accurate, the manager will contact FasTrak Customer Service Department to dispute the charge.
12. When a FasTrak transponder reaches a remaining balance of \$25.00, the manager must initiate increasing the balance. The manager will complete a Department of Consumer Affairs' (DCA) Requisition (99J-27) and submit it to the DCA Accounting Office to request a revolving fund check. The check should be made payable to Bay Area Toll Authority and sent to 475 The Embarcadero, San Francisco, CA 94111. Each time the transponder is replenished, it should be in the amount of \$150.00 and charged to Index 6801, PCA 30500.

FasTrak Disclaimer/Acknowledgment

Terms of Use

The following are the Terms of Use that govern use of the FasTrak. By using the FasTrak, you expressly agree to be bound by these terms and to follow these terms and all applicable laws and regulations governing these terms. Bureau for Private Postsecondary Education (BPPE) reserves the right to change these terms at any time. If you violate these terms, BPPE may terminate your use of the FasTrak and/or take appropriate disciplinary action against you.

- **Unauthorized Use**

Illegal and/or unauthorized use of this FasTrak, including, but not limited to, unauthorized ticket sales, unauthorized linking to the Site, or unauthorized use of automated device, is forbidden and will be investigated and appropriate action will be taken.

- **Violation of Terms**

You understand and agree that at FasTrak's discretion, they may without prior notice, terminate your access, cancel your ticket(s) or exercise any other remedy available; if FasTrak believes that your conduct violates or is inconsistent with these terms.

- **Permitted Use**

You agree that you are only authorized to use this FasTrak transponder for BPPE use.

Employee's Signature _____ Date _____

Employee's Printed Name _____ Transponder # _____



Bureau for Private Postsecondary Education Procedure

Title: File Room Operations and Maintenance Procedures	Supersedes: 2014-0009 October 28, 2014	Procedure #: 2014-0009
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Administration Office Assistant (OA) is responsible for the Bureau for Private Postsecondary Education (Bureau) file room maintenance as well as retrieval and return of all files.

Purpose: To ensure all files are accounted for and to ensure Bureau staff has access to information contained in the school file.

Definitions:

MS Outlook email – The Micro Soft email service utilized by the Department of Consumer Affairs.

Productivity Benchmarks: The OA will spend seven hours per day completing tasks related to file room organization and maintenance.

Procedures for File Room Operations and Maintenance:

1. Bureau employees in need of a file shall send a file request through MS Outlook e-mail to the OA.
2. Once the request is received the OA will retrieve and deliver the file within one-hour of receipt of request.
3. An out card shall be used for every file leaving the file room. The out card shall indicate the name of the file, requestor and date removed from the file room.

4. If the file cannot be located, the requestor will receive a response stating the file is either checked out or file cannot be found.
5. The OA will then send out a Bureau-wide request attempting to locate the file.
6. If the file is located it will be immediately delivered to the requestor.
7. If the file is still unable to be located, the OA will report the missing file to the manager of the Administration Unit.
8. All files shall be placed in the file return basket located at the OA's desk.
9. In the event that the OA is out of the office, Bureau employees shall seek approval from the manager of the Administration Unit before attempting to personally retrieve the file.
10. If permission is granted, upon retrieval of the file, an out card shall be used and an email sent to the OA, with a cc to the Administration Manager, indicating the file retrieved.

Title: Procedures for Processing STRF Assessment Forms Received Without Payment	Supersedes: 2013-0010 October 28, 2014	Procedure #: 2014-0010
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 4
Issue Date: April 20, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Student Tuition Recovery Fund (STRF) is funded by a mandatory fee imposed by the State in accordance with the California Education Code. Qualified California students are subject to a STRF fee and subsequently may be eligible for a reimbursement through STRF should their school close prior to their graduation.

Purpose: The STRF fund exists to relieve or mitigate economic losses suffered by a qualifying student in a qualifying educational program in accordance with California Education Code §94837.

Definitions:

SAIL – The data base that stores information on private postsecondary schools operating in California.

Productivity Benchmarks: The Bureau fiscal analyst may spend up to a total of two days (16 hours) per quarter reconciling STRF Assessment Reporting Forms received from private postsecondary schools without a payment included.

Procedures for Processing the STRF Assessment Reporting Form:

1. STRF Assessment Reporting Forms (Form/STRF-7/10) are submitted by each school on a quarterly basis. The completed forms are received in the mail and provided to the fiscal analyst for processing.

2. The fiscal analyst shall separate out the forms received that do not include a payment and sort them into three categories: schools reporting zero students, schools using STRF credits, and schools failing to submit a payment.
3. The first batch to be processed is the schools reporting zero students.
4. The fiscal analyst will log into SAIL.
5. Enter the Invoice number in the box titled "invoice Number" at the top left of the screen and click "Go."
6. The screen in Table 1 below will appear. Insert the zeros as demonstrated below.

Table 1:

The screenshot displays the S.A.I.L. Revenue Tracking Invoice Detail interface. Key sections include:

- Invoice Information:** Invoice #, Fee Type, Fee Description, CALSTARS Account, BPPVE Fund, Account Index, and Account PC.
- Transaction Information:** Invoice Date, Invoice Created By (JoAnne Allen), Associated Transaction Information (Trans #, Batch #, Ch Recd, Trans Amount, # of Invoices Allocated, Amount of Invoices, Amount of Refunds), and Inactive Invoice Information (Reason for Inactive Status).
- Check For:** New School, Existing School, Other.
- Delinquency Notice Tracking:** First Notice Sent, Second Notice Sent, Intent to Revoke Sent.
- Annual Fee Information:** Month, Year.
- Student Tuition Recovery Fund Assessment Information:** Total Students (A), STRF Students (B), Tuition Charged (C), Tuition PAID (D), STRF Assessment (E), STRF Credits Used, and Actual Calculation.

Blue arrows point to the following fields, all containing zero values:

- Total Students (A)
- STRF Students (B)
- Tuition Charged (C)
- Tuition PAID (D)
- STRF Assessment (E)

The bottom of the screen shows a Windows taskbar with the Start button and system tray icons, including the time 11:27 AM and date 4/20/2015.

7. Click on "Save Work" at the bottom left of the screen.
8. The second batch to be processed is the schools utilizing credits instead of cash payment.
9. Enter the invoice number in the box titled "Invoice Number" at the top left of the screen and click "Go."
10. The screen in Table 2 below will appear. Insert the information as demonstrated below.

11. The total students reported from line A of the STRF Assessment Form is inserted into Line A on the SAIL screen.
12. The total STRF students reported from line B of the STRF Assessment Form is inserted into line B on the SAIL screen.
13. The total tuition charged from line C of the STRF Assessment Form is inserted into line B on the SAIL screen.
14. The total tuition paid from line D of the STRF Assessment Form is inserted into line D on the SAIL screen.
15. The total STRF Assessment from line E of the STRF Assessment Form is inserted into line E of the SAIL screen.
16. The total STRF Assessment from line E of the STRF Assessment Form is also inserted into the box titled "STRF Credits Used" on the SAIL screen.

Table 2:

The screenshot shows the S.A.I.L. Revenue Tracking Invoice Detail interface. The page title is "Revenue Tracking - Detail For Invoice #900268765 (All Access)". The S.A.I.L. logo is visible in the top left. The main content area is divided into several sections:

- Invoice Information:** Includes fields for Invoice #, Fee Type, Invoice Date, Invoice Created By, Fee Description, CALSTARS Account, BPPVE Fund, Account Index, and Account PCA.
- Associated Transaction Information:** Includes fields for Trans #, Batch #, Ck Recd, Trans Amount, # of Invoices Allocated, Amount of Invoices, and Amount of Refunds.
- Check For:** Radio buttons for New School, Existing School, and Other.
- School Name and Address From Current SAIL Profile:** Includes School Code and a dropdown menu.
- Delinquency Notice Tracking:** Includes fields for First Notice Sent, Second Notice Sent, and Intent to Revoke Sent.
- Annual Fee Information:** Includes Month and Year dropdowns.
- Student Tuition Recovery Fund Assessment Information:** This section contains the key data points for steps 11-16:
 - Total Students (A): [Redacted]
 - STRF Students (B): [Redacted]
 - Tuition Charged (C): \$0.00
 - Tuition PAD (D): [Redacted]
 - STRF Assessment (E): [Redacted]
 - STRF From 2002 (F): [Redacted]
 - STRF Credits Used: [Redacted]
 - Actual Calculation: \$479.63
- Inactive Invoice Information:** Includes Reason for Inactive Invoice (School Closure, Duplicate Entry) and a checkbox for "Duplicate Entry".

Blue arrows point from callout boxes to specific fields in the "Student Tuition Recovery Fund Assessment Information" section:

- Callout "See #11" points to "Total Students (A)".
- Callout "See #12" points to "STRF Students (B)".
- Callout "See #13" points to "Tuition Charged (C)".
- Callout "See #14" points to "Tuition PAD (D)".
- Callout "See #15" points to "STRF Assessment (E)".
- Callout "See #16" points to "STRF Credits Used".

At the bottom of the screen, there is a taskbar with various application icons and a system tray showing the time as 11:40 AM on 4/20/2015.

17. Click on "Save Work" at the bottom left of the screen.

Title: STRF Delinquent Fee Notices Procedures	Supersedes: 2014-0011 October 24, 2014	Procedure #: 2014-0011
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Student Tuition Recovery Fund (STRF) is funded by a mandatory fee imposed by the State in accordance with the California Education Code. Qualified California students are subject to a STRF fee and subsequently may be eligible for a reimbursement through STRF should their school close prior to their graduation.

Purpose: The STRF fund exists to relieve or mitigate economic losses suffered by a qualifying student in a qualifying educational program in accordance with California Education Code §94837.

Definitions:

SAIL – The data base that stores information on private postsecondary schools operating in California.

Productivity Benchmarks: The total time spent completing this task can vary depending on the number of schools delinquent in a particular quarter. The Bureau STRF analyst may spend up to five days (40 hours) per quarter researching and preparing delinquency notices as well as completing enforcement referrals for schools that do not comply. Bureau support staff may spend one day (8 hours) per quarter preparing the notices for mailing.

Procedures for STRF Delinquent Fee Notices:

1. A delinquent notice shall be sent to schools that do not submitting timely STRF payments.
2. By the 30th calendar day following the due date of a STRF billing invoice, the STRF analyst will request a Schools Automated Information Link (SAIL) report from the Office of Information Services (OIS) SAIL liaison. This report identifies all of the

schools that have not submitted timely STRF fees. The report contains the school name (main location), school code, address, and the STRF non-payment information.

3. Upon receipt of the report, schools that have reported zero students will need to be manually filtered from the report. The SAIL system is unable to distinguish schools that reported a zero student population from the non-payment schools. Filtering these schools from the report requires manually reviewing each school's STRF information under the Revenue Tracking tab in SAIL. Those schools that reported a zero population are crossed off of the report and no further action need be taken with them.
4. The delinquent letter template is updated to reflect the current date and any corrections/changes made. The letter template can be accessed by following this path: 
5. The delinquent STRF invoices are printed. To print an invoice, access the school information in SAIL. Click on the Revenue Tracking tab. Scroll down to the table at the bottom of the page. Click on the number of the delinquent invoice, then click on the down arrow beside the invoice number to print the invoice.
6. A mail merge is conducted to import the school specific information from the SAIL report to the delinquency letter.
7. The letter is folded so that the school name and address will appear in a #10 window envelope. Also included is a copy of the delinquent STRF invoice.
8. Schools that do not respond within 30 days of the date of the letter will be referred to the Enforcement Unit for appropriate action.

Title: STRF Overpayment Notice Procedures	Supersedes: 2014-0012 October 29, 2014	Procedure #: 2014-0012
Procedure Owner: Administration Unit	Effective: October 29, 2014	Pages: 2
Issue Date: March 25, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that State fiscal resources that are inadvertently paid in error are retrieved and returned to Bureau for Private Postsecondary Education's (Bureau) fund in accordance with the State Administrative Manual and Department of Consumer Affairs (DCA) policy.

Purpose: This procedure outlines the Bureau's fiduciary responsibility to collect STRF payments that were dispersed in error.

Definitions: N/A

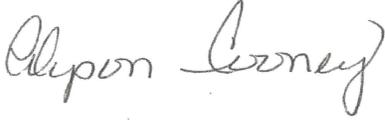
Productivity Benchmarks: The initial attempt (first letter) to collect the overpayment will take the Bureau fiscal analyst 30 minutes to one hour to research and prepare the documents. Each additional attempt will take 10 minutes to complete.

Procedures to Collect STRF Overpayments:

1. If the Bureau inadvertently overpays a STRF claim, the STRF analyst shall immediately initiate the process to collect a repayment from the student that received the overpayment.
2. A letter is generated to the student explaining the overpayment and requesting repayment. The letter template can be accessed by following this path:
~~C:\BPPE\BPPE STUDENT TUITION RECOVERY FUND\STRF Overpayment\first letter~~
 Customize the letter to reflect the specifics of this overpayment. Attach a copy of the original STRF claim. Make a copy for Bureau records and send the original letter (with a copy of the STRF claim attached) to the DCA Accounting Office. The Accounting Office will send the notice to the student.



Bureau for Private Postsecondary Education Procedure

Title: Procedures for Processing STRF Invoices	Supersedes: 2014-0013 October 30, 2014	Procedure #: 2014-0013
Procedure Owner: Administration Unit	Effective: July 15, 2013	Pages: 2
Issue Date: March 25, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that Student Tuition Recovery Fund (STRF) fees collected in accordance with Bureau for Private Postsecondary Education (Bureau) laws and regulations, State Administrative Manual procedures and Department of Consumer Affairs (DCA) policy.

Purpose: This procedure outlines the procedures for processing quarterly STRF fees.

Definitions:

Qualifying institution – A Bureau approved private postsecondary school.

Productivity Benchmarks: The overall process will take approximately one week each quarter from beginning to end although Bureau staff will not be working on the project for much of that time. The Bureau fiscal analyst will spend approximately two hours each quarter coordinating the invoice process.

Procedures for Processing STRF Invoices:

1. STRF invoices are generated and mailed each quarter. To order the quarterly STRF notices, the Bureau fiscal analyst sends a request to the DCA Office of Information Services, SAIL coordinator.
2. The schedule for STRF invoices is as follows:

STRF Quarters	Months	STRF Invoice Run Date
1 st Quarter	January, February, and March	April 1
2 nd Quarter	April, May, and June	July 1

Bureau for Private Postsecondary Education Procedure

Title: OIS Service Request (New Employee) Procedures	Supersedes: New	Procedure #: 2015-0001
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure Bureau for Private Postsecondary (Bureau) information technologies needs are submitted to the Department of Consumer Affairs (DCA) Office of Information Services (OIS) in accordance with DCA policy and procedure.

Purpose: This procedure outlines the process for submitting an OIS service request in anticipation of a new employee.

Definitions:

Bureau OIS Liaison – The Bureau analyst responsible for interacting with the DCA Office of Information Services staff on all information technology matters pertaining to Bureau employees and information technology equipment.

Hardware – The physical parts or components of a computer such as the monitor, mouse, and keyboard.

Software – The machine-readable instructions that directs a computer's processor to perform specific operations such as SAIL, Microsoft Windows and iTunes.

Productivity Benchmarks: The process for placing a service request will vary depending on the number of new employees hired during a month; however, each individual request submission will take approximately 10 minutes to complete.

OIS Service Request (New Employee) Procedures:

1. Upon the acceptance of an employment offer made to a prospective employee, the hiring manager shall notify the Bureau OIS Liaison (Liaison) of the impending start date and the specific information technology needs by completing and submitting a New Employee

Account Set Up form. The form is located as follows: [C:\BPP\BPP ADMINISTRATIVE SUPPORT\New Hire Procedures\OIS New Employee Account Set up Manager form](#)

2. Upon receipt of the form from the hiring manager, the Liaison shall log the request on the Tracking Log. The Tracking Log is located as follows: [C:\BPP\BPP ADMINISTRATIVE SUPPORT\Michael Ojedainformation Technology and Telecommunication Requests](#)
3. The Liaison shall submit an email service request to OIS at ois@wisconsin.gov requesting the applicable computer hardware and software services needed. The service request shall include a detailed description of computer needs of the new employee.
4. Upon receipt of the service request, OIS will provide the Liaison with a service request number.
5. The Liaison shall record the service request number on the tracking log.
6. If after three to five working days the Liaison has not received an installation date from OIS, then the Liaison shall contact OIS to inquire the status.
7. If the installation of the computer has not been completed within 10 working days, the Liaison shall notify the Administration Manager for further direction.
8. Upon completion of the service request, OIS will notify the Liaison. The Liaison shall notify the appropriate manager and user that the request has been completed and confirm that they are satisfied with the outcome.
9. The line item on the Tracking Log can then be updated and shaded to indicate completion. Do not indicate the service request as completed until the entire request has been fulfilled.

Title: Pay Warrant and Advice Notice Distribution Procedures	Supersedes: New	Procedure #: 2015-0002
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 2
Issue Date: March 10, 2015	Approved By: <i>Alyson Cooney</i> Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure Bureau for Private Postsecondary Education (Bureau) employees receive their pay warrant or direct deposit advice notice in a secure manner in order to safeguard against documents being inadvertently provided to the wrong employee or person.

Purpose: This procedure outlines the process for distributing employee pay warrants and direct deposit advice notices on payday.

Definitions:

Pay warrant – The check issued by the State Controller’s Office to an employee for hours worked during a pay period.

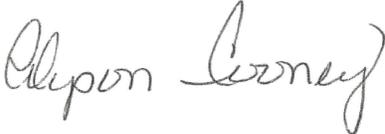
Advice Notice – The receipt issued by the State Controller’s Office to an employee who’s pay warrant was deposited into their bank utilizing direct deposit.

Productivity Benchmarks: The process for distributing pay warrants and advice notices will take the Office Assistant two hours per month to complete.

Pay Warrant and Advice Notice Distribution Procedures:

1. On payday the Department of Consumer Affairs will deliver the pay warrants and advice notices for every Bureau employee in the daily money bag.
2. The Bureau receptionist signs for the money bags.

3. The Bureau receptionist will give the pay warrants and advice notices to the Administration manager.
4. The Administration manager will provide the pay warrants and advice notices along with a current employee roster to the Office Assistant.
5. The Office Assistant will deliver the pay warrants and advice notices to the intended recipients.
6. Upon delivering each document to the intended recipient, the Office Assistant will have the recipient initial receipt on the employee roster.
7. Once all of the pay warrants and advice notices are delivered and signed for by those employees in the office, the Office Assistant will deliver any remaining pay warrants and advice notices and the employee roster to the Administration manager.
8. The Administration manager will ensure that the pay warrants and advice notices for employees whose home is their headquarters are sent via overnight mail to them. They shall be mailed on pay day.
9. The Administration manager will ensure any remaining pay warrants and advice notices are delivered and signed for by the intended recipient.
10. Until the remaining pay warrants and advice notices can be delivered, they will be secured in the locked cabinet in the supply room.
11. The initialed employee roster is to be placed in the monthly timesheet/LAB folder in the Human Resources liaison's cubicle.

Title: New Employee Training Plan Procedures	Supersedes: New	Procedure #: 2015-0003
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 3
Issue Date: March 25, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that new Bureau for Private Postsecondary Education (Bureau) employees are appropriately trained in accordance with the applicable Memorandum Of Understanding, State laws and regulations, and Department of Consumer Affairs (DCA) policy.

Purpose: To ensure employees are given all the tools and resources to reasonably expect successful performance.

Definitions:

Training Plan – A tool used by managers and employees to document training needed and completed.

Productivity Benchmarks: Depending on the complexity of the position, the hiring manager will spend approximately two hours developing a training plan for a subordinate employee and then approximately two to four additional hours per month meeting with the employee to review and sign off on accomplishments.

Procedures for Establishing a Training Plan for New Employees:

1. Upon appointment of an employee to a position they have not previously held (new hire, transfer, promotion, etc.) the hiring manager shall develop a training plan. A sample training plan can be accessed by following this path: ~~ENBPPE~~
~~Managers/Training/Training Plan~~
2. The Training Plan (see Table 1 below) shall be customized for each employee so that all job required and job related classroom training, as well as on-the-job-training, is identified for completion.

3. The hiring manager can identify available training by a number of methods such as, but not limited to:
 - Access the DCA SOLID Leadership Academy on-line calendar to determine internal training opportunities. The calendar can be found on the DCA intranet or by following this path: http://inside.dca.ca.gov/portal/class_calendar.html
 - Identify Bureau workshop opportunities by accessing the workshop calendar on the Bureau's website.
 - Identify State training opportunities by accessing other websites such as CPS, HR Consulting; California Department of Human Resources (CalHR); Department of General Services; and the Office of the Attorney General.
 - Schedule on-the-job/shadow training with tenured Bureau employees.

The training opportunity details are identified in column one of the Training Plan.

4. Once a comprehensive list of training opportunities is identified, the hiring manager must then develop an action plan to ensure the employee understands the purpose of the training and the desired outcome. The action plan is addressed in column two of the Training Plan.
5. The desired outcome/goal is identified in column three of the Training Plan.
6. The due date is listed in column four of the Training Plan. This date is typically the last day of the employee's probationary period; however, the manager may identify an alternate date if desired or necessary. For example, if a particular class is only offered one time and it is imperative that the employee attend on that day, then the date of the class can be entered in this column.
7. As the employee completes each training milestone, he/she shall place the date of completion in the box in column five.
8. As the employee completes each training milestone, he/she shall place his/her initials in the box in column six.
9. The original training plan is provided to the employee during his/her new employee orientation on the first day of employment. The hiring manager will explain the purpose of the Training Plan and go over the specific training exceptions and outcomes with the employee.
10. The original Training Plan is provided to the employee. A copy is provided to the Bureau personnel liaison for inclusion in the employee's file. The supervisor shall also maintain a copy for the supervisory file.
11. The manager shall regularly review the Training Plan and completed action items with the employee. Upon the manager's determination that the employee has

successfully completed the item, the manager shall then place his/her initials in the box in column nine.

12. During the first third of an employee's probationary period (or first two to three months if the new employee is not on probation), the manager shall meet weekly with the new employee to answer questions, assess training and development, make changes to the training plan, reinforce expectations, and provide feed-back.
13. It is during these meetings that the manager will review the completed training milestone and initial the Training Plan. The manager shall also have the employee date and initial the manager's copy of the Training Plan
14. At the point the employee is progressing at the expected level of competency, the manager may prolong the time between meetings with the employee, however, the manager shall meet with the employee at least two times per month, solely for the purpose of discussing training, through the remainder of the probationary period.
15. Upon completion of the Training Plan, a copy of the finalized document shall be provided to the Bureau's personnel liaison for inclusion in the employee's file.

Table 1:

#3 above	#4 above	#5 above	#6 above	#7 above	#8 above	#11 above
Training Opportunity	Action	Goal	Due Date	Completion Date	Employee's Initial Upon Completion	Manager's Initial Upon Completion
SOLID- Welcome to DCA	Attend this training. Upon your return to the office, draft a one page White Paper describing what you learned and how you will use it in your position.	To understand and familiarize you with the BPPE/DCA relationship.				
SOLID- Legislative Process	Attend this training. Upon your return to the office, draft a one page White Paper describing what you learned and how you will use it in your	To understand and familiarize you on the Legislative Process				

	position.					
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Bureau for Private Postsecondary Education Procedure

Title: Non-Sworn Enforcement Identification	Supersedes: New	Procedure #: 2015-0008
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 3
Issue Date: March 6, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Department of Consumer Affairs (DCA), Division of Investigation (DOI), is charged with the responsibility of ensuring the appropriate use of identification credentials (credential) and State of California emblems (emblem) in accordance with Penal Code § 538d, Business and Professions (B&P) Code §147 and 155.

Purpose: To ensure non-sworn enforcement identification and emblems are issued and surrendered in accordance with DCA policy.

Definitions:

Credential - A personalized photo identification card that identifies the holder as a non-sworn DCA employee.

Emblem – A circular State of California badge which identifies the holder as an enforcement representative of DCA.

Productivity Benchmarks: Enforcement managers and supervisors spend up to ten minutes each month sending emails to the Administration Unit requesting credentials and emblems. Upon receipt of the credential(s) and emblem(s), managers and supervisors will spend an additional 10 minutes reviewing DCA policy with employee(s).

The Administration Unit will spend up to one hour each month processing requests, maintaining the spreadsheet, and handling miscellaneous issues pertaining to credentials and emblems.

Procedures for Issuing and Surrendering Credentials and Emblems:

1. Employees who have inspection, compliance, investigation, or other field enforcement responsibilities may be issued an identification credential and emblem to represent their enforcement authority to the public.
2. The Administration Unit manager is responsible for securely maintaining the same number of wallets and emblems as there are appropriate enforcement positions assigned to the Bureau. Unassigned emblems and wallets shall be secured in a locked cabinet at all times.
3. Each emblem shall be affixed with a State Property Tag and the number recorded on a spreadsheet maintained by the Administration Unit manager.
4. Upon an employee's appointment to an appropriate enforcement position, the Enforcement Chief will request that a wallet containing an identification credential and emblem be issued to the employee.
5. The Enforcement Chief will submit the request via email to the Administration Unit manager. The request shall include the employee's name and Civil Service Classification (not working title).
6. Upon receipt, the Administration Unit manager shall complete a Non-Sworn Identification Credential Request (PDE14-012). The request shall include a full resolution current photo taken using the Bureau's digital camera and submitted along with the PDE14-012 on a flash drive or emailed to the DCA Office of Publications.
7. Upon receipt of the identification credential from the DCA Office of Publications, the Administration Unit manager shall retrieve a wallet and emblem from the locked cabinet and insert the identification picture in the wallet.
8. The spreadsheet shall be updated to show the State Property Tag number of the credential being assigned to a particular employee.
9. The employee receiving the credential and emblem shall be provided DCA Policy DOI 13-01, Field Enforcement Identification Credentials and Equipment for Non-Sworn Employees. The employee shall immediately read the policy and submit the attached acknowledgement which will be maintained in the employee's Official Personnel File and the Bureau supervisory file.
10. Upon completion of item nine above the employee will be issued a wallet containing their identification card and emblem.

11. Upon reassignment or separation of an employee that possess a credential and emblem the Enforcement Chief (or designee) shall collect the wallet, identification card and emblem from the employee and immediately surrender them to the Administration Unit manager to secure in the locked cabinet.
12. The Administration Unit manager shall ensure the appropriate emblem was surrendered and update the spreadsheet to reflect that the emblem was returned to inventory.
13. Lost, stolen, missing or damaged credentials and/or emblems shall be immediately reported to the Administration Unit manager.

Title: Inventory Procedures	Supersedes: New	Procedure #: 2015-0013
Procedure Owner: Administration Unit	Effective: Immediately	Pages: 4
Issue Date: April 22, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To ensure that all Bureau for Private Postsecondary Education (Bureau) property inventory is accounted for and documented in accordance with the State Administrative Manual (SAM) and Department of Consumer Affairs (DCA) policy and procedure.

Purpose: This procedure describes the processes for conducting inventory to safeguard against loss, theft, and misuse of State property and the procedure for reporting missing, broken and obsolete property inventory.

Definitions:

Inventory – An itemized list of property and items belonging to an entity.

Productivity Benchmarks: Completion of the annual inventory will take the Administration Unit Staff Services Analyst (SSA) and the Administration Unit Staff Services Manager (SSM) no more than two days to conduct the physical inventory of Bureau assets and prepare the appropriate documentation to close out the preceding fiscal year’s inventory. Throughout the year, the Administration Unit Associate Governmental Program Analyst (AGPA) and SSA will access and update the Inventory Record Log each time an asset is procured or moved within the Bureau. The total amount of time spent will vary depending on employee movement and procurement, but is not expected to take more than 8 hours on a monthly basis.

Procedures for Conducting and Maintaining Inventory:

1. An itemized listing of all Bureaus for Private Postsecondary Education (Bureau) property can be located by following this path: ~~State Inventory~~, then click on the desired fiscal year.
2. The Property Inventory Log shall be secured as a “read only” document. Only the Deputy Bureau Chief, SSM, AGPA, and SSA shall have “write” access.
3. In accordance with SAM 8652, the Bureau is responsible for developing and carrying out an inventory plan to include inventory taking, internal control of inventory, and report and approval of inventory adjustments.
4. In accordance with SAM 8650, all property owned by the Bureau are considered State assets and therefore shall be maintained in an inventory system that records the date acquired, property description, property identification number and the State property tag number.
5. Immediately upon receipt of new property, the Office Technician shall assign a property tag number to the item(s) and record the property tag number on the Property Transaction Form (AISD-034) in the requisition file.
6. In accordance with SAM 8651, property tags shall be placed in plain sight. To the extent possible, all property tags shall be placed on the assets’ front, left-hand corner.
7. The Office Technician shall immediately scan and email the Property Transaction Form (AISD-034) to the Associate Governmental Program Analyst (AGPA) responsible for Business Services duties. The SSM and DCA Business Services Office shall be cc’d on the email.
8. The AGPA shall access the Property Inventory Log (from #1) above and enter the newly acquired item(s) on the log.
9. Upon assigning a newly acquired item to a staff member the Property Inventory Log shall be updated by the SSA.
10. When a staff person leaves the Bureau, the SSA shall document the Property Inventory Log as “Unassigned” for each item that was assigned to the separating employee. This shall be completed no more than three working days following the separation of the employee.
11. Whenever inventoried property is moved or transferred to another staff person the SSA shall consult the Property Inventory Log to determine if an update is necessary. If needed the SSA shall immediately update the Property Inventory Log.

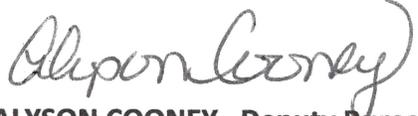
12. Items surveyed throughout the year shall not be removed from the Property Inventory Log at the time they are surveyed. Simply enter "To be surveyed" in the last column.
13. The SSA shall not delete any items from the Property Inventory Log at any time. Only the Deputy Bureau Chief or SSM are authorized to delete information from the Property Inventory Log. The AGPA may add new property to the Property Inventory Log. The SSA may update information pertaining to property, but shall not delete property.
14. Each June 1st a comprehensive inventory shall be conducted. The SSM will print out a copy of the current Property Inventory Log to use as a worksheet and the SSM or his/her designee and the SSA will conduct the annual inventory. Inventory shall be completed by two people working as a team.
15. Together the inventory team will conduct a systematic search for each item listed on the Property Inventory Log. An item that is located as indicated on the worksheet shall be initialed by both team members in the left margin of the Property Inventory Log to indicate the asset is in the Bureau inventory as listed on the Property Inventory Log.
16. Property assigned to field staff shall be inventoried. One member of the inventory team shall send an email to each field staff requesting a picture of the item that includes the affixed property tag for each item assigned to that person. Upon receipt of the pictures, they shall be attached to the appropriate Property Inventory Log sheet.
17. Should an item not be correctly listed on the Property Inventory Log, the inventory team will notate the correct information on the worksheet and both team members will place their initials in the left margin of the Property Inventory Log in the left margin.
18. If an item listed on the worksheet is not easily located, then the inventory team shall conduct a thorough search of the Bureau to attempt to locate the item. Once located, the correct information shall be notated on the worksheet and initialed by both members of the inventory team in the left margin of the Property Inventory Log.
19. Upon completion of #14, #15, #16, and #17 above, every item on the Property Inventory Log should be either accounted for or notated as being surveyed. If this is not the case, then the missing property shall be documented in accordance with SAM 8652.
20. To account for missing property the SSA shall certify by email to the SSM that the inventory team has made every effort to locate the item(s), but have been unsuccessful. In the email, the SSA shall list a description of each missing item, the last known location of the item, who it was last assigned, and a description of the efforts extended to locate the item(s).

21. Utilizing the information provided, the SSA shall complete a Property Inventory Listing Adjustment (STD 157). This form can be accessed by following this path: ~~http://www.documents.dgs.ca.gov/dgs/forms/pdf/std157.pdf~~. This form shall be submitted to the Deputy Bureau Chief for approval no later than June 15 each year.
22. Property determined to be lost, stolen, or destroyed, shall be reported on a Property Survey Report (STD 152). This form can be accessed by following this path: ~~http://www.documents.dgs.ca.gov/dgs/forms/pdf/std152.pdf~~. The SSM shall complete this report and submit it to the Deputy Bureau Chief for approval no later than June 15 each year.
23. The Deputy Bureau Chief shall investigate all of the reported items listed on the STD 157 and STD 152. In accordance with SAM 20080, if the losses are the result of actual or suspected fraud, theft, or other irregularities the Deputy Bureau Chief shall report the incident(s) involving the loss of state asset(s) to the appropriate oversight authority.
24. Upon completion of the annual inventory process the SSA and SSM (or his/her designee) shall place their signature and the current date at the bottom of the Property Inventory Log sheet used to conduct inventory.
25. The completed package is submitted to the Deputy Bureau Chief for review and final approval by June 25th. The completed package shall include, but not be limited to, the worksheet, STD 157, STD 152, email certification for missing items, misc. notes, and a copy of the Property Tag Log.
26. Utilizing the worksheet, the SSM shall update the working copy of the Property Inventory Log. The SSM shall access the Property Inventory Log and save it in the same format but using then new fiscal year.
27. The items that have been surveyed can now be deleted from the Property Inventory Log by the SSM and any approved changes or edits can be corrected.
28. In accordance with SAM 8652 the signed and dated copy of the Property Inventory Log and all of the supporting documents shall be retained for audit purposes for five years.
29. The Bureau's annual inventory process shall be completed by no later than June 30th each year.

**LICENSING
UNIT
PROCEDURES**



Bureau for Private Postsecondary Education Procedure

Title: Addition of a Separate Branch Application	Supersedes: July 3, 2013	Procedure #: 2013-0002
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 6
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Add A Branch application and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

Productivity Benchmarks: Approximately 2 hours of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
1. Verification of Correct Application Submitted <ul style="list-style-type: none"> ❖ If the school is an approved non-accredited institution, an Application for Addition of Separate Branch must be submitted with the \$3,000.00 non-refundable application fee. ❖ If the school is approved by means of accreditation an Application for Addition of Separate Branch must be submitted with the \$250.00 non- 	SSA/AGPA

<p>refundable application fee.</p> <ul style="list-style-type: none"> ❖ If the school is not an approved institution (by any means), the institution may not add a branch, the appropriate application for approval to operate must be submitted 	
<p>2. Routine Verification Audits</p> <p>Current Valid Approval</p> <ul style="list-style-type: none"> ○ In the “Schools’ General Information” screen, click on the “Approval” tab to check the school’s expiration date. An application for the addition of a branch will <u>not</u> be approved for an institution with an expired approval. <ul style="list-style-type: none"> ▪ If institution’s approval to operate has expired, notify institution that an application for renewal must be submitted (if eligible, refer to “Renewal Notification Process section of procedures). ▪ An application for the addition of a branch will <u>not</u> be approved for an institution with an expired approval. <p>Pending Complaints</p> <ul style="list-style-type: none"> ○ In the “Schools’ Information” screen in SAIL, click on “Enforcement”. ○ Open and closed complaints will be displayed; if the “Date Closed” field is empty, the complaint is open. ○ If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. <i>“Are there any violations that Licensing should be aware of prior to granting an approval?”</i> <p>Revenue Tracking</p> <ul style="list-style-type: none"> ○ Check for past due STRF assessments or Annual Fees <ul style="list-style-type: none"> ▪ In the “School’s General Information” screen enter the school code and press “Go” ▪ Click on “Revenue Tracking” ▪ If annual fees or STRF assessments are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices. To print invoices click on the “Invoice #” field, next to the invoice that is outstanding. This will prompt the invoice to print. <p>Pending Applications</p> <ul style="list-style-type: none"> ○ Check SAIL for other pending applications for the institution <ul style="list-style-type: none"> ▪ In the “School’s General Information” screen, click on the “applications” tab. ▪ Scroll down to determine if there are pending applications; check the “App Status” field. If applications are pending, this field will read “Receipt letter sent” or “Pending”. ▪ Pull pending application(s) and review if not already assigned to 	<p>SSA/AGPA</p>

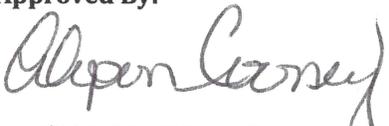
<p>an analyst.</p>	
<p>3. Application Review</p> <ul style="list-style-type: none"> ○ The application must be an original, not a reproduction (sometimes schools reproduce the application, changing the formatting, etc.). ○ Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application. ○ The application must have original signature(s); photocopied signatures are not acceptable. ○ Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicated on the application. Use the “Add a Branch” application review checklist to complete the application review. ○ If the application is incomplete, prepare a deficiency letter as follows: <ul style="list-style-type: none"> ▪ In the G drive, follow this path: BPPE/Licensing/Non-Accredited Approval/Add a Branch/Add a Branch Deficiency Letter ▪ Using the template, modify as applicable to the institution’s specific deficiencies. Save a copy of the letter in your directory, using the “save as” feature, so as to maintain the integrity of the template letter. ▪ Mail the deficiency letter with the original signature to the institution; maintain a copy with the application packet. ▪ The institution is given one opportunities to correct identified deficiencies. If the application does not demonstrate compliance after the deficiency letter has been forwarded, consult with the licensing manager and discuss possibility of issuing a denial. 	<p>SSA/AGPA</p>
<p>4. Update Access/Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> ○ Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> ▪ In the G drive, follow this path: BPPE/Licensing/Non-Accredited Approval/Add a Branch/Addition of a Separate Branch Memo ○ Update SAIL <ul style="list-style-type: none"> ▪ Enter the “Application Number” in the application query section of SAIL. ▪ Press add comment. ▪ Type: Application forwarded to Manager for Approval or Denial and the date. ▪ Submit complete package to Licensing Manager for review. • After the application is returned by the Licensing Manager Go back into the comments and type: Returned from Manager and enter the date. • If licensing manager determines additional information is required, prepare deficiency letter (refer to “Application 	<p>SSA/AGPA</p>

<p>Review" section). Update SAIL (refer to "Updating SAIL" section).</p>	
<p>5. Notification to Institution</p> <ul style="list-style-type: none"> ○ If application is approved prepare approval letter <ul style="list-style-type: none"> ▪ In the G drive, follow this path: BPPE/Licensing/Non-Accredited Approvals/Add a Branch/Add a Branch Approval Letter ▪ Using the template, change the information in the highlighted fields to reflect information specific to the institution. ▪ Forward to licensing manager for signature. ○ If application is denied prepare denial letter. <ul style="list-style-type: none"> ▪ In the G drive, follow this path: BPPE/Licensing/Denials/Denial Template ▪ Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution. ▪ Forward letter to Licensing Manager. ▪ The Licensing Manager will review the letter for accuracy and then forward to the Licensing Chief for signature. ▪ When denial letter is returned with signature of Licensing Chief, forward then entire file to the Denial Liaison. 	<p>SSA/AGPA</p>
<p>6. Updating the Applications Processing Database in SAIL</p> <ul style="list-style-type: none"> ○ In the "Applications Processing" screen, enter the application number and click on "Go". Verify the following: <ul style="list-style-type: none"> ▪ The institution code should be linked to the application; you can confirm this by making sure the "Institution Code" field is completed in the application detail screen ▪ Confirm that the address for the proposed branch campus has been correctly entered into SAIL; the address should be identical to that listed on the application. ○ Click on the "Application Specific Information" filed located in the bottom right corner of the screen <ul style="list-style-type: none"> ▪ Enter the "Site Approval Effective Date" ▪ Click on "Save Work" field located in the bottom left hand corner of the screen ○ Click on "General Information" to return to "Application Detail" screen ○ In the "Current Status" field, select "Approved" from the drop-down menu. ○ Click on "Status Date" field. A pop-up box will appear asking if you would like to approve. Click "OK". ○ A pop-up box with the school code will appear; click on "OK" ○ A pop-up box will appear asking if you would like to go to the Branch. Click "OK". 	<p>SSA/AGPA</p>
<p>7. If an approved institution adds a branch within 5 miles of a main or branch campus, or if the branch location is being added during the</p>	<p>SSA/AGPA</p>

<p>processing of an initial application for approval to operate, an “Add a Branch” application is <u>not</u> required. Perform the following steps to update the SAIL database:</p> <ul style="list-style-type: none"> ○ In SAIL click on the “Applications Processing” field. ○ Click on “Enter New Application”. <ul style="list-style-type: none"> ▪ Enter the date in the “Date Received” field. ▪ In the “Application Type” field, select “Degree” from the drop-down menu. ▪ In the “Application Category” field, select “Add a Branch”. ▪ In the “Staff Assignment” field, select assigned staff member’s name from the drop-down menu. ▪ In the “Institution Code” field, enter the school code for the main campus location. ▪ Enter the name of the school in the “School Name” field. ▪ Enter the branch location address in the “Physical Address” field. ▪ In the “Ledger” field, enter the six digit number that is stamped onto the application. ▪ Enter the date in the “Date Received” field; this is located in the top right corner of the application. Then click on “Submit New Application”. ○ A pop-up box will appear displaying the application number, click “OK”. ○ Enter address and other info as needed. ○ Click on “Application Specific Information” field in located in bottom right hand corner of screen and enter the “Site Approval Effective Date”. ○ Click on “Save Work” located in the bottom left corner of the screen. ○ Click on “General Information” to return to “Application Detail” screen. ○ In the ‘Current Status’ field, select ‘Approved’ from the drop-down menu. ○ Click on “Status Date” field. A pop-up box will appear asking if you would like to approve. Click “OK”. ○ A pop-up box with the school code will appear; click on “OK”. <p>A pop-up box will appear asking if you would like to go to the Branch. Click “OK”.</p>	
<p>8. Print Approved Programs and Locations</p> <ul style="list-style-type: none"> ○ In SAIL click on the “Report Center” tab <ul style="list-style-type: none"> ▪ Look under the “Official Bureau Documents” section ▪ Click on “Official Approved/Registered Programs List” box ▪ Click “Print” ▪ Using the method above, print the “Approved Branch/Satellite Location List” if applicable. 	<p>SSA/AGPA</p>

Bureau for Private Postsecondary Education Procedure

<p>Notification to Institution (perform ONE of the following)</p> <p>9. Prepare approval letter</p> <ul style="list-style-type: none"> ○ In the G drive, follow this path: <u>BPPE/Licensing/Non-Accredited Approval/Add a Branch/Add a Branch Approval Letter</u> ○ Using the template, change the information in the highlighted fields to reflect information specific to the institution. ○ Forward to licensing manager for signature. ○ Make a copy of the signed approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable). ○ Mail letter with original signature and Approved/Registered Programs List to school's mailing address. ○ Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school's file. ○ Proceed to "Completed Application" section. 	<p>SSA/AGPA</p>
<p>10. Prepare denial letter</p> <ul style="list-style-type: none"> ○ In the G drive, follow this path: <u>BPPE/Licensing/Non-Accredited Denial</u> ○ Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution. ○ Forward letter to Licensing Manager. ○ When denial letter is returned with the Bureau Chief's signature, forward the entire file to the Denial Liason. <p><i>Note: For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC), BPPE approval or denial letter must be forwarded to Christine Jones at BBC by email (Christine.Jones@dca.ca.gov), and a cc to the Licensing Manager is required. You may forward an unsigned version of the approval letter; it is not necessary to scan the document with the licensing manager's signature.</i></p>	<p>SSA/AGPA</p>
<p>11. Updating the Applications Processing Database in SAIL</p> <ul style="list-style-type: none"> ○ In the "Applications Processing" screen, enter the application number and click on "Go". ○ In the "Current Status" field, select "Approved", or "Denied" from the drop-down menu. ○ Click on "Save Work". ○ Click on "Save and Exit". 	<p>SSA/AGPA</p>
<p>12. File Completed Application</p> <ul style="list-style-type: none"> ○ Place application in institution's permanent file. <ul style="list-style-type: none"> ▪ Refer to "File Organization" section for instructions. 	<p>SSA/AGPA</p>

Title: 30-Day Application Review	Supersedes: July 3, 2013	Procedure #: 2013-0003
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 2
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the 30-day application review and how that application should be handled and reviewed. The purpose of the 30-day application review is to determine if the application is accompanied by all of the required supplemental documentation. Support staff will perform a brief review to determine if the institution has included the applicable attachments with the application. An in-depth application review will subsequently be performed by an analyst.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation

Productivity Benchmarks: Approximately 1 hour of staff time to complete the intake process per application.

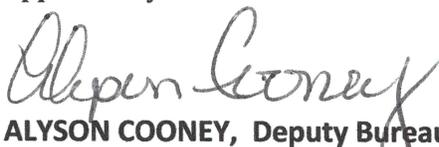
Procedures:

Task	Who is Responsible
1. Open the Review Checklist <ul style="list-style-type: none"> Follow this path to locate the checklist: BPPE/Licensing/30-Day Review Checklists 	OT

<ul style="list-style-type: none"> Choose the applicable application type and open document. <p>Enter the name of the institution, application number and your name (name of reviewer).</p>	
<p>2. Document Review</p> <ul style="list-style-type: none"> Pull the oldest application from the shelf at the Office Technician's desk. Using the customized checklist, review the application documents and indicate whether or not the required attachments are included with the application. 	OT
<p>3. Perform one of the following:</p> <ul style="list-style-type: none"> If all required documents/attachments are not included, indicate by completing the "Documents Incomplete" section. Print checklist on canary yellow paper and proceed as follows: 	OT
<p>4. Prepare Notification Letter for Identified Missing Documentation</p> <ul style="list-style-type: none"> Follow this path to locate the document: BPPE/Licensing/20 Day Review Checklists/20 Day Draft Letter Using the template letter: <ul style="list-style-type: none"> Change the date, mailing address, application type and application number. Specify the identified missing documentation according to the checklist that you prepared. Make a copy of the letter; one copy is mailed to the school, and the other is attached to the checklist and placed in the application packet. It is not necessary to sign the letter. File the application in the application section on the pending applications shelf by application type and in numerical order. If all required documents/attachments are included, indicate by completing the "All documents received" section by inserting the date. Print the checklist on canary yellow paper, attach to application packet. Prepare and mail "Receipt Letter" <ul style="list-style-type: none"> In the "Application Detail" screen, click on "Print Receipt Letter". Make a copy; forward one to the school and maintain the other with the application packet. File application on pending applications shelf (by application type and in numerical order) 	OT



Bureau for Private Postsecondary Education Procedure

Title: Application Entry	Supersedes: March 7, 2013	Procedure #: 2013-0004
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 3
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with entering applications and how they should differ depending on whether there is an existing school code or not.*

Definitions: *Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.*

Productivity Benchmarks: Approximately 30 minutes of staff time to complete the application entry.

Procedures:

Application Entry for School's with School Codes	Who is Responsible
<ol style="list-style-type: none"> 1. In SAIL click on "Applications Processing" <ul style="list-style-type: none"> • Click on "Enter a New Application" <ul style="list-style-type: none"> ○ Enter application type (always use Application Type "Degree"). ○ Choose the appropriate application category from the drop-down menu. ○ Choose analyst's name from staff assignment drop-down menu. If application is not being assigned to an analyst, choose staff assignment as "Central Records". ○ Enter school code (for the main location) in the institution code box. ○ Enter the school name and address. ○ Click on "Submit new application". ○ An application number will be assigned, write this number in 	OT

Bureau for Private Postsecondary Education Procedure

<p>the upper right hand section of the application in the designated area.</p>	
<p>2. The application details screen will appear</p> <ul style="list-style-type: none"> ○ Enter the school name, address, and the contact person's name and telephone number as they appear on the application. Pay careful attention, the institution's physical address and mailing address may differ. ○ Print a receipt letter, make a copy before mailing. ○ Stamp "COPY" on the Bureau's copy of the receipt letter and attach to the back of the application. 	OT
<p>3. The cashiering office will forward a copy of application page 1 with revenue tracking information (ledger number, payment amount and date payment was received).</p> <ul style="list-style-type: none"> ○ In the Application's Processing screen, in the "Revenue Tracking" box, enter the transaction/ledger # (the six digit number stamped onto the application by the cashiering office). ○ Enter the check number, date payment received and payment amount. ○ If the application has been assigned to an analyst, give the copy of the application page to the analyst. ○ If the application has not yet been assigned, place the application page with the application (on the application shelf). 	OT
<p>Application Entry for School's without School Codes</p>	
<p>Make sure to check <u>each</u> application to verify whether or not an institution has an existing school code. If a school code does not exist, proceed as follows:</p>	OT
<p>1. In SAIL click on "Applications Processing" Click on "Enter a New Application"</p> <ul style="list-style-type: none"> ○ Enter application type (always use Application Type "Degree"). ○ Choose the appropriate application category from the drop-down menu. ○ Choose analyst's name from staff assignment drop-down menu. If application is not being assigned to an analyst, choose staff assignment as "Central Records". ○ Enter the institution name and address. ○ Click on "Submit new application". ○ An application number will be assigned, write this number in the upper right hand section of the application in the designated area 	OT
<p>2. The application details screen will appear</p> <ul style="list-style-type: none"> ○ Enter the school name, address, and the contact person's name and telephone number as they appear on the application. Pay careful attention, the institution's physical address and mailing address may differ. 	OT



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<ul style="list-style-type: none">○ Print a receipt letter, make a copy before mailing.○ Stamp "COPY" on the Bureau's copy of the receipt letter and attach to the back of the application.	
<p>3. The Cashiering office will forward a copy of application page 1 with revenue tracking information (ledger number, payment amount and date payment was received).</p> <ul style="list-style-type: none">○ In the "Applications Processing" screen, in the "Revenue Tracking" box, enter the transaction/ledger # (the six digit number stamped onto the application by the cashiering office).○ Enter the check number, date payment received and payment amount.	OT



Bureau for Private Postsecondary Education Procedure

Title: Initial Application Intake	Supersedes: March 7, 2013	Procedure#: 2013-0005
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 4
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with the Initial Application Intake process and how that application should be handled and reviewed.*

Definitions: *(Define key words discussed in the procedure – see example below.)*

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Productivity Benchmark: Approximately 30 Minutes of staff time to complete the intake review.

Procedures:

Task	Who is Responsible
1. Verify the amount of applications received within the application packet; there are instances in which multiple applications are submitted at once.	OT
2. Verify that all applications are date stamped. If there is no date stamp on the application, stamp the front page of the document with the date.	OT
3. Verify that a photocopy of the check(s) for the application fee should be included with the application(s). If no photocopied check is included, the application may have a stamp from the Administrative Unit indicating that no fees were received.	OT

Bureau for Private Postsecondary Education Procedure

<p>4. If no fees were received, return the application to the institution with a 'no fees received' notification letter.</p> <ul style="list-style-type: none"> • In the G drive follow this path: BPPE\Licensing\Non-Accredited Approvals\No-Fee-Received-Notification\No-Fee-Notification-Letter • Using the template, change the information in the highlighted fields to reflect information specific to the institution. • Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter. • Mail the deficiency letter to the institution, maintaining a copy for the school's file 	<p>OT</p>
<p>5. If the original check is included with the application, return the check and application to the Office Technician (or other designated individual in the Administrative unit). The Administrative staff will give you a photocopy of the check. The Administrative staff will forward the check and a copy of the first page of the application to central cashing for processing.</p>	<p>OT</p>
<p>6. Verify that the correct application type has been submitted. An application for renewal cannot be submitted if the institution's approval to operate has been expired for more than six months. If the institution is not approved by means of accreditation they cannot submit a Renewal by accreditation.</p> <p>a. If the institution submitted a Renewal Application for a Non-Accredited Institution and the full approval has been expired for more than 6 months:</p> <ul style="list-style-type: none"> ○ In the G drive follow this path: BPPE\Licensing\30-Day-Review-Checklist\Wrong-Application-Received\30-Day-Letter-Wrong-Application-Received-(Renewal-Non-Accredited-Expired-over-6-months) ○ Using the template, change the information in the highlighted fields to reflect information specific to the institution. ○ Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter. ○ Obtain the Licensing Manager's signature, mail the deficiency letter to the institution, send copies to all cc's, and maintain a copy for the school's file. ○ If the institution has a full approval and submitted a Renewal Application for an Accredited Institution and the approval has been expired for more than 6 months: <ul style="list-style-type: none"> ○ In the G drive follow this path: BPPE\Licensing\30-Day-Review-Checklist\Wrong-Application-Received\30-Day 	<p>OT</p>

Bureau for Private Postsecondary Education Procedure

<p>Letter Wrong Application Received (Renewal Accredited Expired over 6 months)</p> <ul style="list-style-type: none"> ○ Using the template, change the information in the highlighted fields to reflect information specific to the institution. ○ Save a copy of the letter in your directory, using the “save as” feature, so as to maintain the integrity of the template letter. ○ Obtain the Licensing Manager’s signature, mail the deficiency letter to the institution, send copies to all cc’s, and maintain a copy for the school’s file. <p>○ If the institution has a full approval and submitted a Renewal Application for an Accredited Institution and the approval has been expired for less than 6 months:</p> <ul style="list-style-type: none"> ○ In the G drive follow this path: BPPE\Licensing\30 Day Review Checklist\Wrong Application Received\30 Day Letter Wrong Application Received (Renewal Accredited Expired under 6 months) ○ Using the template, change the information in the highlighted fields to reflect information specific to the institution. ○ Save a copy of the letter in your directory, using the “save as” feature, so as to maintain the integrity of the template letter. <p>○ Obtain the Licensing Manager’s signature, mail the deficiency letter to the institution, send copies to all cc’s, and maintain a copy for the school’s file.</p>	
<p>7. Check SAIL to see if the applicant (institution) has or previously obtained Bureau approval. If the institution has a school code, enter the application into SAIL with the correct institution code.</p>	OT
<p>8. Check SAIL for current analyst assignment to other applications submitted by the institution. Dependent upon the application type, assign to the analyst currently processing other applications for the institution. <i>(See Application Types Processed by Analysts section of procedures below)</i></p>	OT
<p>9. Check SAIL to confirm the application is signed by the current owner(s) of record. If the ownership is a corporation an additional check of the Secretary of State website is required to confirm the corporation is still in good standing. Print this confirmation and attach to the application. If not, include this section in the 30 day letter. (See 30-day letter procedures)</p>	OT
<p>10. For all Renewal and Substantive Change Applications, check the Bureau’s website to confirm the institution has submitted the most</p>	OT



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recent Annual Reports. If not, include this information in the 30 day letter. (See 30-day letter procedures)	
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Application Types Processed by Analysts

AGPA

- Approval to Operate an Institution Non-Accredited
- Approval to Operate an Accredited Institution
- Renewal of Approval to Operate (accredited and non-accredited)
- Addition of a Separate Branch
- Change of Name
- Change of Location
- Change of Business Organization/Control/Ownership
- Change in Method of Instructional Delivery
- Change of Educational Objectives (preliminary review only)
- Verification of Exempt Status

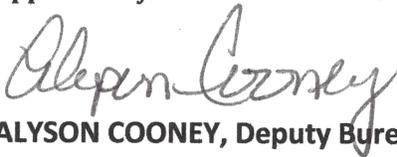
SSA

- Approval to Operate an Accredited Institution
- Renewal of Approval to Operate (accredited and non-accredited)
- Addition of a Separate Branch
- Change of Name
- Change of Location
- Change of Business Organization/Control/Ownership
- Change in Method of Instructional Delivery
- Change of Educational Objectives (preliminary review only)

(SSA's may process Approval to Operate Non-Accredited Institution or Verification of Exempt Status applications dependent on level of review required)



Bureau for Private Postsecondary Education Procedure

Title: Change in Method of Instructional Delivery Application	Supersedes: March 7, 2015	Procedure #: 2013-0006
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 6
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Significant Change in Method of Instructional Delivery Application and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation

Productivity Benchmarks: Approximately 8 hours of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
1. Routine Verification Audits Current Valid Approval <ul style="list-style-type: none"> ○ In the “Schools’ General Information” screen, click on the “Approval” tab to check the school’s expiration date. An application for change in method of instructional delivery will <u>not</u> be approved for an institution with an expired approval. 	SSA/AGPA/ED Spec

<ul style="list-style-type: none"> ○ If institution’s approval to operate has expired, notify institution that an application for renewal must be submitted (if eligible, refer to “Renewal Notification Process section”). <ul style="list-style-type: none"> ▪ If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status. ▪ If more than six months have passed since the institution’s approval to operate has expired, the institution must submit a new application (renewal is not an option). Call or forward written correspondence to inform school of the expired approval status. 	
<p>2. Pending Complaints</p> <ul style="list-style-type: none"> ○ In the “Schools’ General Information” screen in SAIL, click on “Enforcement” ○ Open and closed complaints will be displayed; if the “Date Closed” field is empty, the complaint is open. ○ If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. “Are there any violations that Licensing should be aware of prior to granting an approval?” 	SSA/AGPA/Ed Spec
<p>3. Revenue Tracking</p> <ul style="list-style-type: none"> ○ Check for past due STRF assessments or Annual Fees. <ul style="list-style-type: none"> ▪ In the “School’s General Information” screen click on “Revenue Tracking”. <p>If any of the above noted fees are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices. To print invoices click on the “Invoice #” field next to the invoice that is outstanding. This will prompt the invoice to print.</p>	SSA/AGPA/Ed Spec
<p>4. Pending Applications</p> <ul style="list-style-type: none"> ○ Check SAIL for other pending applications for the 	SSA/AGPA/Ed Spec

<p>institution.</p> <ul style="list-style-type: none"> ▪ In the 'School's General Information' screen, click on the "Applications" tab. ▪ Scroll down to determine if there are pending applications; check the "App Status" field. If applications are pending, this field will read "Receipt letter sent" or "Pending". ▪ If a pending application is unassigned, pull the application and review concurrently. 	
<p>5. Application Review</p> <ul style="list-style-type: none"> • The application must be an original, not a reproduction (sometimes schools reproduce the application, changing the formatting, etc.). • Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application. • The application must have original signatures; photocopied signatures are not acceptable. • Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicated on the application. Use the "Significant Change in Method of Instructional Delivery" application review checklist to complete the application review. • If the application is incomplete, prepare a deficiency letter as follows: <ul style="list-style-type: none"> ○ In the G drive, follow this path: BPPE/Licensing/Non Accredited Approval/Significant Change in Instructional Delivery ○ Using the template, modify as applicable to the institution's specific deficiencies. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter. ○ Mail the deficiency letter with the original signature to the institution; maintain a copy with the application packet. • The institution is given one opportunity to correct identified deficiencies. If the application does not demonstrate 	<p>SSA/AGPA/Ed Spec</p>

<p>compliance after the deficiency letter has been forwarded, consult with licensing manager and discuss possibility of issuing a denial.</p>	
<p>6. Update SAIL/Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> • Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> ○ In the G drive, follow this path: BPPE/Licensing/Non-Accredited Approval/Addl Branch/Additional for a Separate Branch Memo • Update SAIL <ul style="list-style-type: none"> ○ Enter the “Application Number” in the application query section of SAIL. ○ Press add comment. ○ Type : Application forwarded to Manager for Approval or Denial and the date. ○ Submit complete package to Licensing Manager for review. • After the application is returned by the Licensing Manager Go back into the comments and type: Returned from Manager and enter the date. • If licensing manager determines additional information is required, prepare deficiency letter (refer to “Application Review” section). Update SAIL (refer to “Updating SAIL” section). 	
<p>7. Notification to Institution (perform one of the following)</p> <p>Prepare approval letter</p> <ul style="list-style-type: none"> • In the G drive, follow this path: BPPE/Licensing/Non-Accredited Approval/Significant Change in Instructional Delivery/Significant Change in Instructional Delivery Approval Letter • Using the template, change the information in the highlighted fields to reflect information specific to the institution. • Forward to licensing manager for signature. <p>Prepare denial letter</p> <ul style="list-style-type: none"> • In the G drive, follow this path: BPPE/Licensing/Denials/Denial Template • Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution. 	

- Forward letter to Licensing Manager. The Licensing Manager will review for accuracy and then forward to the Licensing Chief for signature.
- When the denial letter is returned with the Licensing Chief's signature, forward the entire file to the Denial Liaison.

Note: For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC), BPPE approval or denial letter must be forwarded to Christine Jones at BBC by email (Christine.Jones@dca.ca.gov), and a cc to the Licensing Manager is required. You may forward an unsigned version of the approval letter; it is not necessary to scan the document with the licensing manager's signature.

8. Entering the Significant Change in Method of Instructional Delivery in SAIL (for approved applications)

- In the "School's Information" screen, enter the school code and click on "Go".
- Click on the "Programs" tab.
- Click on the right hand corner in the "Program Title" box.
 - Click on the "Residential/Traditional Setting box or the Distance Learning box to indicate the applicable type of instruction now offered by the institution.

Click on "Save Work".

9. Print Approved Programs and Locations

- In SAIL click on the "Report Center" tab.
 - Look under the "Official Bureau Documents" section.
 - Click on "Official Approved/Registered Programs List" box
 - Click "Print".

Using the method above, print the "Approved Branch/Satellite Location List" if applicable.

10. Mail Approval Letter

- Make a copy of the approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable).
- Mail letter with original signature and Approved/Registered Programs List to school's mailing address.

Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school's file.

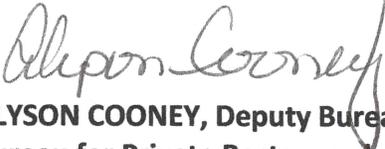
11. Updating the Applications Processing Database in SAIL

- In the "Applications Processing" screen, enter the application number and click on "Go".
- In the "Current Status" field, select "Approved" or

<p>“Denied” from the drop-down menu.</p> <ul style="list-style-type: none">• Click on “Save Work”.• “Status Modification” Box will appear; read and click ‘OK’. <p>Click on “Save and Exit”.</p>	
<p><u>12. File Completed Application</u></p> <ul style="list-style-type: none">• Place application in institution’s permanent file <p>Refer to “File Organization” section for instructions</p>	



Bureau for Private Postsecondary Education Procedure

Title: Application for Approval to Operate for a Non-Accredited Institution	Supersedes: November 5, 2015	Procedure #: 2013-0007
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 9
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Application for Approval to Operate for a non-accredited Institution and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

Productivity Benchmark: Approximately 24 hours of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
1. Routine Verification Audits Current Valid Approval	SSA/AGPA/

- In the “Schools’ General Information” screen, click on the “Approval” tab to check the school’s expiration date.
- If institution’s approval to operate has expired over 6 months and a Renewal application has not been submitted, the full approval application is required.

Ed Spec

Check SAIL to determine if institution’s approval to operate is valid

- In SAIL, click on the “Schools Information” tab
- Enter the institution’s school code
- The screen that is displayed will include the institution’s approval expiration date; check the date for validity of approval
 - If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status.

Pending Complaints

- In the “School’s General Information” screen in SAIL, click on “Enforcement”.
- Open and closed complaints will be displayed; if the “Date Closed” field is empty, the complaint is open.
- If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. Use the following language in the email to the Enforcement Analyst. “Are there any violations that Licensing should be aware of prior to granting an approval?”

Revenue Tracking

- Check for past due STRF assessments and Annual Fees.
 - In the “School’s General Information” screen click on “Revenue Tracking”.
 - If any of the above noted fees are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices.

Pending Applications

- Check SAIL for other pending applications for the institution.
 - In the “School’s General Information” screen, click on

the “Applications” tab.

- Scroll down to determine if there are pending applications; check the ‘App Status’ field. If applications are pending, this field will read ‘Receipt letter sent’ or ‘Pending’.

Compliance Desk Inspection (Prior Approval/Expired)

- Check SAIL comments for recent Compliance Inspections. If an inspection occurred within the prior 6 months obtain a copy of the compliance inspection.
- Review the compliance inspection to determine if there were any violations with the enrollment agreement and the catalog.
- If outstanding compliance issues the documents will need to undergo a complete review.
- If no outstanding compliance issues, there is no need to re-review the catalog and enrollment agreement.

2. Application Review

- The application must be an original, not a reproduction.
- Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application.
- The application must have original signatures; photocopied signatures are not acceptable.
- Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicated on the application. Use the “Approval to Operate an Institution Non Accredited” application review checklist to complete the application review. Make note if the information for each section was provided and if it meets the minimum operating standards.
- Verify the following when applicable
 - Corporation status - confirm that corporation is in good standing (active) on the CA Secretary of State website:
<http://www.sos.ca.gov/>
 - Using SAIL, perform an ownership check to determine if other institutions are owned by the proposed owner(s), and if so, if the institution is in good standing with the Bureau. If results are positive and there are identified problems with the institution(s) consult with licensing manager.
 - In “Schools Information” click on “Other Searches”
 - Click on the “Ownership Searches” field

SSA/AGPA/
Ed Spec

- Type the owner's last name in the field titled "Owner Name Search Parameter", then click on "Search"
- If the individual is owner of another institution, that information will be displayed
- Use the "Catalog Minimum Requirements" checklist to review the school's catalog. Do not delete anything from the checklist. Use the following standard language on the deficiency letter:

A checklist noting deficiencies within the catalog is included. Please return the signed checklist noting the page numbers on which the corrections have been made.

 - Items marked with page numbers represent information within the catalog that has been found to be in compliance. If the catalog is revised and this information is relocated, please indicate the new page numbers on which the information has been placed.
 - Items without page numbers represent information within the catalog that needs to be added or revised. Please refer to the checklist for detailed information regarding each deficient item.
- Use the "Enrollment Agreement Minimum Requirements" checklist to review the school's enrollment agreement. Do not delete anything from the checklist. Use the following standard language on the deficiency letter:

A checklist noting deficiencies within the enrollment agreement is included. Please return the signed checklist noting the page numbers on which the corrections have been made.

 - Items marked with page numbers represent information within the enrollment agreement that has been found to be in compliance. If the enrollment agreement is revised and this information is relocated, please indicate the new page numbers on which the information has been placed.
 - Items without page numbers represent information within the enrollment agreement that needs to be added or revised. Please refer to the checklist for detailed information regarding each deficient item.
- If the application is incomplete or not in compliance, prepare a deficiency letter as follows:
 - In the G drive, follow this path: [BPPE/Unlicensed/Non-Approved Applicants/Non-Approved Institutions/Deficiency Letters](#)
 - Using the template, modify as applicable to the institution's

<p>specific deficiencies. Each deficiency shall contain the following: 1. Acknowledge items submitted. 2. Explain what is missing and/or deficient and why it does not meet the minimum requirements. 3. Explain what is required to meet compliance. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter.</p> <ul style="list-style-type: none"> ○ Mail the deficiency letter with the original signature to the institution; send copies to the owner's home address and the contact person if different; maintain a copy with the application packet. ○ The institution is given one opportunity to correct identified deficiencies. If the application does not demonstrate compliance after the response to the deficiency letter, consult with licensing manager and discuss possibility of issuing a denial or provisional approval. 	
<p>3. Forward to Licensing Manager for Approval or Denial</p> <ul style="list-style-type: none"> ● Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> ○ In the G drive, follow this path: \\dca.ca.gov\files\HQSA\apps\GROUPS\BPPE\LICENSING\Application Documents\Non Accredited Approval\Approval Memo - Accredited Institution\Approval Memo - Forward to Ed Spec.doc ○ G:\BPPE\LICENSING\Application Documents\Non Accredited Approval\Approval Memo - Accredited Institution\Denial Memo - Degree.doc <p>The denial memo shall contain a brief reason for denial listing the sections of the application that are deficient.</p>	<p>SSA/AGPA/ Ed Spec</p>
<p>4. Notification to Institution (perform ONE of the following)</p> <p>Prepare approval letter</p> <ul style="list-style-type: none"> ● In the G drive, follow this path: G:\BPPE\Licensing\Non Accredited Approval\Non Accredited Institutions\Full Approval Letter ● Using the template, change the information in the highlighted fields to reflect information specific to the institution. ● Forward to licensing manager for signature. 	<p>SSA/AGPA/ Ed Spec</p>

- Make a copy of the signed approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable).

Prepare denial letter

- In the G drive, follow this path [BPPE/Licensing/Division/Denial Template](#)
- Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution. Licensing will draft the denial pending the Quality of Education review.
- Forward the draft letter to your Licensing Manager.
- The Licensing Manager will review for accuracy and then forward the Licensing Chief for signature and if applicable the application and denial letter will be sent to the Quality of Education Unit.
- The Quality of Education Unit will upon review of the application will send a deficiency letter and will include the remaining deficiencies outlined in the draft denial letter prepared by Licensing.
- If the application is still deficient after the applicant responds to the QEU deficiency letter, the QEU will add to the drafted denial letter.
- The application will then be forwarded to the Licensing Chief for signature.
- Once the denial is signed the Licensing Chief will forward to the Denial Liaison Analyst. See procedure for further.

Note: For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC): BPPE denial or approval letter must be forwarded to Christine Jones at BBC by email (Christine.Jones@dca.ca.gov), and a cc to the licensing manager is required.

5. Updating the Applications Processing Database in SAIL

- In the "Applications Processing" screen, enter the application number and click on "Go".
- If the institution has an existing institution code, change the application type to "Approval to Operate an Accredited Institution" (this will prevent a new institution code being issues)
- In the "Current Status" field, select "Approved" from the drop-down menu.
- Click on "Save Work".
- If you changed the application type to prevent an institution code being issued, change the application type back to the correct application.

SSA/AGPA/
Ed Spec

6. Entering Institutional Information in SAIL –

Field staff shall complete the SAIL Up-date form in the G drive, follow this path:

SSA/AGPA/
Ed Spec

~~S:\DPPE\LICENSING\Application Documents\Non-Accredited
Approval\Approval Non-Accredited Institution\SALE Update Request.docx~~

Ownership

- In the “School’s General Information” screen, enter the institution code and click on “go”.
- Click on “Add a School Item”
- Click on “Add an Owner”
- A box will appear asking “Would you like to replace all current owners with this new owner?” Click “yes”.
- Enter the new owner(s) name(s), corporation name if applicable, address, telephone number, date ownership began and percentage of ownership. Click “Submit”.
- Enter as applicable: parent company, business type, state of incorporation, date of incorporation, FEIN or SSN.
- Click on “Save Work”.
- The “Active Ownership” field must read “True”; this indicates the name(s) of the current owner(s). The word “False” in this field indicates the name(s) of the previous owner(s).

Add Approved Programs

- Click on the “Add a School Item” field.
- Click on “Add a Program”. Enter the following:
 - Program name/course title
 - Date program approved
 - Application number
 - Program type – select from drop-down menu (degree or non-degree)
 - Click “Submit”
 - If the institution was previously exempt or registered with the prior bureau change the registered programs to non-degree if applicable and discontinue programs as applicable.
- A new screen will open; enter information into or place a check mark in the following fields:
 - “Residential/Traditional Setting” (this indicates instructional delivery takes place in a classroom)
 - “Distance Learning” – if institution has distance learning programs check the box in this field
 - “Length of instruction” – indicate program length in hours or credits/units
 - “Concurrent approval required by” – if concurrent approval is required by another agency, enter the agency’s information in this field
 - “Description” – use the drop down box to choose the appropriate program type

<ul style="list-style-type: none"> ○ Click "Save Work" ● Repeat process for each additional program <p>Add Branch/Satellite Locations (if applicable)</p> <ul style="list-style-type: none"> ● In SAIL click on the "Applications Processing" field. ● Click on "Enter New Application". <ul style="list-style-type: none"> ○ Enter the date in the "Date Received" field. ○ In the "Application Type" field, select "Degree" from the drop-down menu ○ In the "Application Category" field, select "Add a Branch". ○ In the "Staff Assignment" field, select assigned staff member's name from the drop-down menu. ○ In the "Institution Code" field, enter the school code for the main campus location. ○ Enter the name of the school in the "School Name" field. ○ Enter the branch location address in the "Physical Address" field. ○ In the "Ledger" field, enter the six digit number that is stamped onto the application. ○ Enter the date in the "Date Received" field; this is located in the top right corner of the application. Then click on "Submit New Application". ● A pop-up box will appear displaying the application number, click "OK". ● Enter address and other info as needed. ● Click on "Application Specific Information" field in located in bottom right hand corner of screen and enter the "Site Approval Effective Date". ● Click on "Save Work" located in the bottom left corner of the screen. ● Click on "General Information" to return to "Application Detail" screen. ● In the "Current Status" field, select "Approved" from the drop-down menu. ● Click on "Status Date" field. A pop-up box will appear asking if you would like to approve. Click "OK". ● A pop-up box with the school code will appear; click on "OK". ● A pop-up box will appear asking if you would like to go to the Branch. Click "OK". <p>Miscellaneous Entries</p> <ul style="list-style-type: none"> ● The "Contact Info", "Custodian of Records" and "Agent for Process" information is completed in the "School's General Information" screen. <ul style="list-style-type: none"> ○ Retrieve this information from the application. <p>Click on applicable tab, enter information and save work.</p>	
<p>7. Print Approved Programs and Locations</p>	<p>SSA/AGPA/</p>

Bureau for Private Postsecondary Education Procedure

<ul style="list-style-type: none"> ● In SAIL click on the “Report Center” tab <ul style="list-style-type: none"> ○ Look under the “Official Bureau Documents” section ○ Click on “Official Approved/Registered Programs List” box ○ Click “Print” ○ Using the method above, print the “Approved Branch/Satellite Location List” if applicable. 	Ed Spec
<p>8. Mail Approval Letter</p> <ul style="list-style-type: none"> ● Make a copy of the approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable). ● Mail letter with original signature and Approved/Registered Programs List to school’s mailing address. ● Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school’s file. 	SSA/AGPA/ Ed Spec
<p>9. Completed Application</p> <ul style="list-style-type: none"> ● Place application in institution’s permanent file. <ul style="list-style-type: none"> ○ Refer to “File Organization” section of procedures manual for instructions. 	SSA/AGPA/ Ed Spec



Bureau for Private Postsecondary Education Procedure

Title: Application for Verification of Exempt Status	Supersedes: July 3, 2013	Procedure#: 2013-0008
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 4
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Application for Verification of Exempt Status and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

Productivity Benchmark: Approximately 2 hours of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
1. Application Review <ul style="list-style-type: none"> The application must be an original, not a reproduction (sometimes schools reproduce the application, changing the formatting, etc.). 	AGPA

Bureau for Private Postsecondary Education Procedure

<ul style="list-style-type: none"> ● Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application. ● The application must have original signature(s); photocopied signatures are not acceptable. ● Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicated on the application. Use the “Application for Verification of Exempt Status” application review checklist to complete the application review. ● If the application is incomplete, prepare a deficiency letter as follows: <ul style="list-style-type: none"> ○ In the G drive, follow this path: BPPE/Licensing/Verification of Exemption/Verification of Exemption Deficiency Letter ○ Using the template, modify as applicable to the institution’s specific deficiencies. Save a copy of the letter in your directory, using the “save as” feature, so as to maintain the integrity of the template letter. ○ Mail the deficiency letter with the original signature to the institution; maintain a copy with the application packet. 	
<p>2. Update SAIL/Forward to Licensing Manager for Review</p> <ul style="list-style-type: none"> ● Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> ○ In the G drive, follow this path: BPPE/Licensing/Verification of Exemption/Verification of Exemption Deficiency Letter ○ Update SAIL with the current status of the application. ○ If licensing manager determines additional information is required, prepare deficiency letter (refer to “Application Review” section). 	AGPA
<p>3. Notification to Institution (perform ONE of the following) <u>Prepare “Verification of Exempt Status” letter</u></p> <ul style="list-style-type: none"> ● In the G drive, follow this path BPPE/Licensing/Verification of Exemption/Verification of Exemption Deficiency Letter 	AGPA

<p><u>Exemption/Verification of Exempt Letters</u></p> <ul style="list-style-type: none"> Using the template, change the information in the highlighted fields to reflect information specific to the institution. Forward to licensing manager for signature. Make a copy of the signed letter. <p>Prepare "Unable to Verify" letter.</p> <ul style="list-style-type: none"> In the G drive, follow this path: <u>DPE/Licensing/Verification of Exemption/Unable to Verify Exemption</u> Using the template, modify the letter according to the denial reason specific to the institution. Forward letter to Licensing Manager. Make a copy of the signed letter. 	
<p>4. Entering status Change in SAIL (for previously approved institutions)</p> <ul style="list-style-type: none"> In the "Schools' General Information" screen, enter the school code and click on "Go". Click on the "School Status" field. Choose "Exempt" from the drop-down menu when the exemption is verified. Choose "Active CEC-94905" for exemptions verified under 94874.1 (Non-WASC Regional Accreditation) 	AGPA
<p>5. Updating the Applications Processing Database in SAIL</p> <ul style="list-style-type: none"> In the "Applications Processing" screen, enter the application number and click on "Go". In the "Current Status" field, select "Exempt" from the drop-down menu. Click on "Save Work". "Status Modification" Box will appear; read and click "OK". <p>Click on "Save and Exit".</p>	AGPA
<p>6. Mail Letter</p> <ul style="list-style-type: none"> Make a copy of the Verification of Exempt Status or Unable to Verify letter. <p>Mail letter with original signature to institution.</p>	AGPA
<p>7. File Completed Application</p> <ul style="list-style-type: none"> There is a designated area in the file room for verification of exempt and unable to verify exemption applications. There is separate shelf space for verified exemptions and unable to verify applications. The applications are filed in alphabetical order within each folder. 	AGPA

<ul style="list-style-type: none"> • If verification of exemption was granted to an institution that was previously granted an approval to operate, pull the file from the shelf and place on the verification of exempt status shelf in alphabetical order. 	
<p>8. Institution's Non-Agreement with Unable to Verify</p> <ul style="list-style-type: none"> • If the institution has documented a means of adjusting their organization to meet the exemption, the application may be changed to verified. <p>If the institution still does not meet the requirements for exemption: Telephone the institution and explain to them why they do not meet the exemption. Follow-up with a formal letter. At this time there is not an appeal process for this type of application.</p>	<p>AGPA</p>



Bureau for Private Postsecondary Education Procedure

Title: Application for Renewal of Approval to Operate and offer Educational Programs for Non-Accredited Institutions	Supersedes: July 3, 2013	Procedure #: 2013-0009
Policy Owner: Licensing Unit	Effective: Immediately	Page: 1 of 6
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Application for Renewal of Approval to Operate and offer Educational Programs for Non-Accredited Institutions and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

Productivity Benchmark: Approximately 12 hours of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
1. Routine Verification Audits	SSA/AGPA

Pending Complaints

- In the “School’s General Information” screen in SAIL, click on “Enforcement”.
- Open and closed complaints will be displayed; if the “Date Closed” field is empty, the complaint is open.
- If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. “Are there any violations that Licensing should be aware of prior to granting an approval?”

Revenue Tracking

- Check for past due STRF assessments or Annual Fees.
- In the “School’s General Information” screen click on “Revenue Tracking”.
- If any of the above noted fees are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices.

Pending Applications

- Check SAIL for other pending applications for the institution.
- In the “School’s General Information” screen, click on the “applications” tab.
- Scroll down to determine if there are pending applications; check the ‘App Status’ field. If applications are pending, this field will read ‘Receipt letter sent’ or ‘Pending’.
- Pull pending application(s) and review if not already assigned to an analyst.

Compliance Desk Inspection

- Check SAIL comments for recent Compliance Inspections. If an inspection occurred within the prior 6 months obtain a copy of the compliance inspection.
- Review the compliance inspection to determine if there were any violations with the enrollment agreement and the catalog.
- If outstanding compliance issues the documents will need to undergo a complete review.
- If no outstanding compliance issues, there is no need to re-review the catalog and enrollment agreement.

2. Application Review

SSA/AGPA

- The application must be an original, not a reproduction.
- Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application.
- The application must have original signatures; photocopied signatures are not acceptable.
- Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicated on the application. Use the "Approval to Operate an Institution Non Accredited" application review checklist to complete the application review.
- If the application is incomplete, prepare a deficiency letter as follows:
 - In the G drive, follow this path: [BBPE/Licensing/Non Accredited Applications/Non Accredited Institutions/Deficiency Letters](#)
 - Using the template, modify as applicable to the institution's specific deficiencies. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter.
 - Mail the deficiency letter with the original signature to the institution; maintain a copy with the application packet.
 - The institution is given one opportunity to correct identified deficiencies. If the application does not demonstrate compliance after the deficiency letter has been forwarded, consult with licensing manager and discuss possibility of issuing a denial.
 - Verify the following when applicable
 - Corporation status - confirm that corporation is in good standing (active) on the CA Secretary of State website: [http://keplersos.ca.gov/](#)
 - Using SAIL, perform an ownership check to determine if other institutions are owned by the proposed owner(s), and if so, if the institution is in good standing with the Bureau. If results are positive and there are identified problems with the institution(s) consult with licensing manager.
 - In "Schools Information" click on "Other

- Using the template, change the information in the highlighted fields to reflect information specific to the institution.
- Forward to licensing manager for signature.
- Make a copy of the signed approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable).

Prepare denial letter

- In the G drive, follow this path: [BPPE/Licensing/Denials/Denial Template](#)
- Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution.
- Forward letter to Licensing Manager. The Licensing Manager will review for accuracy and the forward to the Licensing Chief for signature.
- When denial letter is returned with the Licensing Chief's signature, forward the entire file to the Denial Liaison.

Note: For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC): BPPE approval letter must be forwarded to Christine Jones at BBC by email ([\[redacted\]](#)) and a cc to the licensing manager is required.

5. Updating the Applications Processing Database in SAIL

- In the "Applications Processing" screen, enter the application number and click on "Go".
- In the "Current Status" field, select "Approved" from the drop-down menu.
- Click on "Save Work".
- **A message will display directing you to another screen.**
- In the "Approval Detail" box
 - Enter the associated application number
 - Enter the approval date (current date)
 - Enter the expiration date (five years from the approval date)

Choose approval status from the drop-down menu

6. Entering Institutional Information in SAIL

Add an Institutional Approval

- In the "School's General Information" screen, enter the school code and click on "go".
- Click on "Add an Institutional Approval"
- The "Add and Institutional Approval" box will appear; complete the following fields:

SSA/AGPA

SSA/AGPA

Bureau for Private Postsecondary Education Procedure

<ul style="list-style-type: none"> ○ Qualifying Application Number – enter the application number ○ Institutional Approval Status – enter “full approval” ○ Institutional Approval Date – enter date renewal of approval is effective ○ Institutional Approval Expiration Date – enter date that is five years from effective date above <p>Miscellaneous Entries</p> <p>The following information may be updated during the renewal process without the submission of additional applications:</p> <ul style="list-style-type: none"> ● The “Contact Info”, “Custodian of Records” and “Agent for Process” information is completed in the “School’s General Information” screen. <ul style="list-style-type: none"> ○ Retrieve this information from the application. ○ Click on applicable tab, enter the updated information and save work. ○ Check the educational programs for any “registered” programs. If the institution is still offering these programs change them to Non-Degree programs. 	
<p>7. Print Approved Programs and Locations</p> <ul style="list-style-type: none"> ● In SAIL click on the “Report Center” tab <ul style="list-style-type: none"> ○ Look under the “Official Bureau Documents” section ○ Click on “Official Approved/Registered Programs List” box ○ Click “Print” ○ Using the method above, print the “Approved Branch/Satellite Location List” if applicable. 	SSA/AGPA
<p>8. Mail Approval Letter</p> <ul style="list-style-type: none"> ● Make a copy of the approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable). ● Mail letter with original signature and Approved/Registered Programs List to school’s mailing address. ● Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school’s file. 	SSA/AGPA
<p>9. Completed Application</p> <ul style="list-style-type: none"> ● Place application in institution’s permanent file. <p>Refer to “File Organization” section of procedures manual for instructions.</p>	SSA/AGPA

Bureau for Private Postsecondary Education Procedure

Title: Application for Approval to Operate by Means of Accreditation	Supersedes: July 3, 2013	Procedure #: 2013-0010
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 6
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Application for Approval to Operate by Means of Accreditation and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation

Productivity Benchmark: Approximately 1 hour of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
<p><u>Routine Verification Audits</u></p> <p>1. Pending Complaints</p> <ul style="list-style-type: none"> ○ In the "School's General Information" screen in SAIL, click on "Enforcement". ○ Open and closed complaints will be displayed; if the "Date Closed" field is empty, the complaint is open. ○ If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. "Are there any violations that Licensing should be aware of prior to granting an approval?" 	<p>SSA/AGPA</p>
<p>2. Revenue Tracking</p> <ul style="list-style-type: none"> ○ Check for past due STRF assessments or Annual Fees <ul style="list-style-type: none"> ▪ In the "School's Information" screen enter the school code and press "Go". ▪ Click on "Revenue Tracking". <p>If annual fees or STRF assessments are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices. To print invoices click on the "Invoice #" field, next to the invoice that is outstanding. The will prompt the invoice to print.</p>	<p>SSA/AGPA</p>
<p>3. Pending Applications</p> <ul style="list-style-type: none"> ○ Check SAIL for other pending applications for the institution. <ul style="list-style-type: none"> ▪ In the "School's General Information" screen, click on the "Applications" tab. ▪ Scroll down to determine if there are pending applications; check the "App Status" field. If applications are pending, this field will read "Receipt letter Sent" or "Pending". <p>If a pending application is unassigned, pull the application and review it along with the approval by means of accreditation application. If assigned, communicate with the analyst to determine if the application(s) should be re-assigned so that only one analyst is working with the institution.</p>	<p>SSA/AGPA</p>

<p>4. Application Review</p> <ul style="list-style-type: none"> • The application must be an original, not a reproduction (sometimes schools reproduce the application, changing the formatting, etc.). • Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application. • The application must have original signatures; photocopied signatures are not acceptable. • Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicted on the application. 	<p>SSA/AGPA</p>
<p>5. Accrediting Agency Verification</p> <ul style="list-style-type: none"> • Verify that accrediting agency is recognized by the United States Department of Education using the following link: [Redacted Link] • The letter from the accrediting agency must be current and include: <ul style="list-style-type: none"> ○ Address for approved main, branch and satellite campuses ○ Current ownership information with percentages ○ Approved programs with hours/credits for main, branch and satellite campuses ○ Term of accreditation- mm/dd/year (If letter includes only month and year, approve until last day of month) <p>If the accrediting agency is <u>not</u> recognized by the United States Department of Education the application must be denied. (proceed to application denial section- #11)</p>	<p>SSA/AGPA</p>
<p>6. Incomplete Application</p> <ul style="list-style-type: none"> • If the application is incomplete, prepare a deficiency letter as follows: <ul style="list-style-type: none"> ○ In the G drive, follow this path: [Redacted Path] ○ Using the template, modify as applicable to the institution's specific deficiencies. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter. ○ Mail the deficiency letter with the original signature to the institution contact person and owner(s). Maintain a copy for the Bureau's records. 	<p>SSA/AGPA</p>
<p>7. Updating the Applications Processing Database for Approved Applications</p> <ul style="list-style-type: none"> • In SAIL in the "Applications Processing" screen, enter the application number and click on "Go". 	<p>SSA/AGPA</p>

- Verify application detail screen is filled out completely including the revenue tracking information.
- In the “Current Status” field, select “Approved” from the drop-down menu.
- Click in “Status Date” box and pop up will appear. Read and accept changes.
- Click on “Save Work”.
 - “Status Modification” Box will appear; read and click ‘OK’.
 - Click on “Save and Exit”.

8. Updating SAIL

Add institutional approval

- In the “Schools Information” screen, enter the school code.
- Click on “Add School Item”.
- Click on “Add Institutional Approval”.
- Enter the Institutional Approval type as “Accredited Institutional Approval”.
- Enter the Institutional Approval date as noted on the accreditor’s letter.
- Enter the institutional approval expiration (use earliest expiration if multiple terms of accreditation are listed).

Add Ownership Information

Ownership information may already be in SAIL if school was previously approved; but if the institution was granted accreditation during the Bureau’s sunset, SAIL may not have this information. To add proceed as follows:

- Click on the “Ownership” field and enter the ownership information.
- Enter the owner(s) name(s), corporation name if applicable, address, telephone number, date ownership began and percentage of ownership. Click “Submit”.
- Enter as applicable: parent company, business type, state of incorporation, date of incorporation, FEIN or SSN.
- Click on “Save Work”.
- The “Active Ownership” field must read “True”; this indicates the name(s) of the current owner(s). The word “False” in this field indicates the name(s) of the previous owner(s).

Add Approved Programs

Program information may already be in SAIL if school was previously approved; but if the institution was granted accreditation during the Bureau’s sunset, SAIL may not have this information. To add proceed as follows:

- Verify if any of the programs require another agencies approval by checking the “Concurrent Approvals List” in the G Drive at the following path:

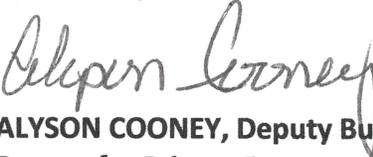
SSA/AGPA

<p>..\.\LICENSING\Licensing Reference Binder\Concurrent Approvals.xls</p> <ul style="list-style-type: none"> ○ Click on the "Add a School Item" field. ○ Click on "Add a Program". Enter the following: <ul style="list-style-type: none"> ○ Program name/course title ○ Date program approved ○ Application number ○ Program type – select from drop-down menu (degree or non-degree). ○ Click "Submit". ○ A new screen will open; enter information into or place a check mark in the following fields: <ul style="list-style-type: none"> ○ "Residential/Traditional Setting" (this indicates instructional delivery takes place in a classroom) ○ "Distance Learning" – if institution has distance learning programs check the box in this field. ○ "Length of instruction" – indicate program length in hours or credits/units. ○ "Concurrent approval required by" – if concurrent approval is required by another agency, enter the agency's information in this field. ○ "Description" – use the drop-down menu to choose the appropriate program type. ○ Click "Save Work". ○ Repeat process for each additional program. <p>Add Accrediting Body/Agency</p> <ul style="list-style-type: none"> ○ In the "Schools' General Information" screen, click on the "Accrediting Body/Agency field, choose the applicable accrediting agency from the drop-down menu. ○ Click on "Save Work". 	
<p>9. Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> ● Prepare memorandum to Licensing Manager with your recommendation ● In the G drive, follow this path: \G:\licensing\Accredited Institutions\Approvals\Memo Approval to Operate an Accredited Institution\Recommendation template <p>Prepare approval letter</p> <ul style="list-style-type: none"> ○ In the G drive, follow this path: \G:\licensing\Accredited Institutions\Approvals\Approval to Operate Accredited Institution\Approval Template Letter ○ Using the template, change the information in the highlighted fields to reflect information specific to the institution. 	<p>SSA/AGPA</p>

<p>Print Approved Programs and Locations</p> <ul style="list-style-type: none"> ○ In the SAIL “Schools’ General Information” screen click on the “Report Center” tab. ○ Look under the “Official Bureau Documents” section. ○ Click on “Official Approved/Registered Programs List” box. ○ Click “Print”. <p>Using the method above, print the “Approved Branch/Satellite Location List” if applicable.</p> <ul style="list-style-type: none"> ● Update SAIL <ul style="list-style-type: none"> ○ Enter the “Application Number” in the application query section of SAIL. ○ Press add comment. ○ Type: Submitted to next level of review for Approval or Denial. ○ Submit complete package to Licensing Manager for review. ● After the application is returned by the Licensing Manager Go back into the comments and type: Returned from Manager. 	
<p>10. Notification to Institution</p> <p>Once Approved:</p> <ul style="list-style-type: none"> ● Make a copy of the signed approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable). 	SSA/AGPA
<p>11. Prepare denial letter.</p> <ul style="list-style-type: none"> ● In the G drive, follow this path: BPPE/Institutional/Institutional Denial Letter Template ● Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution. ● Forward letter to Licensing Manager. The Licensing Manager will review for accuracy and then forward to the Licensing Chief for signature. ● When denial letter is returned with signature of Licensing Chief, forward the entire file to the Denial Liaison. <p><i>Note: For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC), BPPE approval or denial letter must be forwarded to Christine Jones at BBC by email (Christine.Jones@dca.ca.gov), and a cc to the Licensing Manager is required. You may forward an unsigned version of the approval letter; it is not necessary to scan the document with the licensing manager’s signature.</i></p>	SSA/AGPA
<p>12. File Completed Application</p> <ul style="list-style-type: none"> ● Place application in institution’s permanent file. <ul style="list-style-type: none"> ○ Refer to “File Organization” for instructions. 	SSA/AGPA



Bureau for Private Postsecondary Education Procedure

Title: Change of Name Application for Institutions Approved by Means of Accreditation	Supersedes: July 3, 2015	Procedure #: 2013-0011
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 5
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Change of Name Application for Institutions Approved by Means of Accreditation and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

Productivity Benchmark: Approximately 1 hour of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
1. Routine Verification Audits Current Valid Approval	SSA/AGPA

- In the “Schools’ General Information” screen, click on the “Approval” tab to check the school’s expiration date. An application for change of name will not be approved for an institution with an expired approval.
- If institution’s approval to operate has expired, notify institution that an application for renewal must be submitted (if eligible, refer to “Renewal Notification Process”).
 - If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status.
 - If more than six months have passed since the institution’s approval to operate has expired, the institution must submit a new application (renewal is not an option). Call or forward written correspondence to inform school of the expired approval status.

Pending Complaints

- In the “Schools’ General Information” screen in SAIL, click on “Enforcement”.
- Open and closed complaints will be displayed; if the “Date Closed” field is empty, the complaint is open.
- If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. “Are there any violations that Licensing should be aware of prior to granting an approval?”

Revenue Tracking

- Check for past due STRF assessments or Annual Fees
 - In the “School’s Information” screen enter the school code and press “Go”.
 - Click on “Revenue Tracking”.
 - If annual fees or STRF assessments are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices. To print invoices click on the “Invoice #” field, next to the invoice that is outstanding. This will prompt the invoice to print.

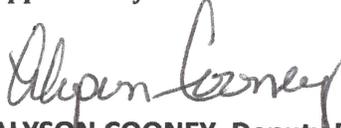
<p>Pending Applications</p> <ul style="list-style-type: none"> ○ Check SAIL for other pending applications for the institution. <ul style="list-style-type: none"> ▪ In the “Schools’ General Information” screen, click on the “Applications” tab. ▪ Scroll down to determine if there are pending applications; check the “App Status” field. If applications are pending, this field will read “Receipt letter Sent” or “Pending”. ▪ If a pending application is unassigned, pull the application and review it concurrently. 	
<p>2. Application Review</p> <ul style="list-style-type: none"> ● The application must be an original, not a reproduction (sometimes schools reproduce the application, changing the formatting, etc.). ● Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application. ● The application must have original signature(s); photocopied signatures are not acceptable. ● Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicated on the application. ● The application must include a copy of the current verification of accreditation granted by the accrediting agency; document must reflect the change of name. ● If the application is incomplete, prepare a deficiency letter as follows: <ul style="list-style-type: none"> ○ In the G drive, follow this path: B:\PE\LICENSING\Accredited Approval\Change of Name\Deficiency Change of Name Accrediting List _____ _____ _____ ○ Using the template, modify as applicable to the institution’s specific deficiencies. Save a copy of the letter in your directory, using the “save as” feature, so as to maintain the integrity of the template letter. ○ Mail the deficiency letter with the original signature to the institution contact person and owner(s); maintain a copy with the application packet. 	<p>SSA/AGPA</p>

<ul style="list-style-type: none"> The institution is given one opportunity to correct identified deficiencies. If the application does not demonstrate compliance after the deficiency letter has been forwarded, consult with the licensing manager and discuss possibility of issuing a denial. 	
<p>3. Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> In the G drive, follow this path: [Redacted Path] Prepare approval letter <ul style="list-style-type: none"> In the G drive, follow this path: [Redacted Path] Using the template, change the information in the highlighted fields to reflect information specific to the institution. <p>Updating the Applications Processing Database in SAIL</p> <ul style="list-style-type: none"> In the "Applications Processing" screen, enter the application number and click on "Go". In the "Current Status" field, select "Approved" or "Denied" from the drop down box. Click on "Save Work". "Status Modification" Box will appear; read and click "OK". Click on "Save and Exit". <p>Entering the Change of Name in SAIL (for approved applications)</p> <ul style="list-style-type: none"> In the "School's General Information" screen, enter the school code and click on "Go". Click on the "School Institution Name" field. Enter the new name of the institution and click on "Save Work". "Audit Tracking" box pops up. Select "Yes" to confirm name change. "Reason for Manual Change" box pops up. Enter application number and then select "OK". <p>Print Approved Programs and Locations</p> <ul style="list-style-type: none"> In SAIL click on the "Report Center" tab <ul style="list-style-type: none"> Look under the "Official Bureau Documents" section Click on "Official Approved/Registered Programs List" box Click "Print" <p>Using the method above, print the "Approved</p>	<p>SSA/AGPA</p>

<p>Branch/Satellite Location List” if applicable.</p> <ul style="list-style-type: none"> • Press add comment. • Type: Application forwarded to next level of review for Approval or Denial and the date. • Submit complete package to Licensing Manager for review. • After the application is returned by the Licensing Manager Go back into the comments and type: Returned from Manager and enter the date. • If licensing manager determines additional information is required, prepare deficiency letter (refer to “Application Review” section). Update SAIL (refer to “Updating SAIL” section). 	
<p>6. Notification to Institution (perform ONE of the following)</p> <p><u>Mail Approval Letter</u></p> <ul style="list-style-type: none"> • Make a copy of the approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable). • Mail letter with original signature and Approved/Registered Programs List to school’s mailing address. <p>Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school’s file.</p> <p><u>Prepare denial letter.</u></p> <ul style="list-style-type: none"> • In the G drive, follow this path: [REDACTED] <u>Template</u> • Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution. • Forward letter to Licensing Manager. The Licensing Manager will review for accuracy and the forward to the Licensing Chief for signature. • When denial letter is returned with signature of Licensing Chief, forward the entire file to the Denial Liaison. <p><i>Note: For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC), BPPE approval or denial letter must be forwarded to Christine Jones at BBC by email (Christine.Jones@dca.ca.gov), and a cc to the Licensing Manager is required. You may forward an unsigned version of the approval letter; it is not necessary to scan the document with the licensing manager’s signature.</i></p>	<p>SSA/AGPA</p>
<p>9. File Completed Application</p> <ul style="list-style-type: none"> • Place application in institution’s permanent file. <ul style="list-style-type: none"> ○ Refer to “File Organization” section for instructions. 	<p>SSA/AGPA</p>



Bureau for Private Postsecondary Education Procedure

Title: Addition of a Separate Branch Application for Institutions Approved by Means of Accreditation	Supersedes: July 3, 2013	Procedure #: 2013-0012
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 6
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Add a Branch Application for Institutions Approved by Means of Accreditation and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

Productivity Benchmark: Approximately 1 hour of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.



Bureau for Private Postsecondary Education Procedure

Procedures:

Task	Who is Responsible
<p>1. Verification of Correct Application Submitted</p> <ul style="list-style-type: none"> ❖ If the school is an approved non-accredited institution, an Application for Addition of Separate Branch must be submitted with the \$3,000.000 non-refundable application fee. ❖ If the school is approved by means of accreditation an Application for Addition of Separate Branch must be submitted with the \$250.00 non-refundable application fee. ❖ If the school is not an approved institution (by any means), the institution may not add a branch, the appropriate application for approval to operate must be submitted. 	SSA/AGPA
<p>2. Routine Verification Audits</p> <p>Current Valid Approval</p> <ul style="list-style-type: none"> ○ In the "School's General Information" screen, click on the "Approval" tab to check the school's expiration date. An application for addition of a branch will <u>not</u> be approved for an institution with an expired approval. ○ If institution's approval to operate has expired, notify institution that an application for renewal must be submitted. <ul style="list-style-type: none"> ▪ If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status. ▪ If more than six months have passed since the institution's approval to operate has expired, the institution must submit a new application (renewal is not an option). Call or forward written correspondence to inform school of the expired approval status. <p>Pending Complaints</p> <ul style="list-style-type: none"> ○ In the "Schools' General Information" screen in SAIL, click on "Enforcement". ○ Open and closed complaints will be displayed; if the "Date Closed" field is empty, the complaint is open. ○ If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. "Are there any violations that Licensing should be aware of prior to granting an approval?" 	SSA/AGPA

Revenue Tracking

- Check for past due STRF assessments or Annual Fees
 - In the "School's General Information" screen enter the school code and press "Go"
 - Click on "Revenue Tracking"
 - If annual fees or STRF assessments are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices. To print invoices click on the "Invoice #" field, next to the invoice that is outstanding. This will prompt the invoice to print.

Pending Applications

- Check SAIL for other pending applications for the institution
 - In the "Schools' General Information" screen, click on the "Applications" tab.
 - Scroll down to determine if there are pending applications; check the "App Status" field. If applications are pending, this field will read "Receipt letter sent" or "Pending".
 - Pull pending application(s) and review if not already assigned to an analyst.

3. Application Review

- The application must be an original, not a reproduction (sometimes schools reproduce the application, changing the formatting, etc.).
- Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application.
- The application must have original signature(s); photocopied signatures are not acceptable.
- Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicated on the application. The application must include a copy of the current verification of accreditation granted by the accrediting agency; document must reflect the addition of branch/satellite campuses.
- If the application is incomplete, prepare a deficiency letter as follows:
 - In the G drive, follow this path:
[BPP\LICENSING\Accredited Approvals\Addition of a Separate Branch\Deficiency A-11-Branch Template.docx](#)
 - Using the template, modify as applicable to the

SSA/AGPA

<p>institution's specific deficiencies. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter.</p> <ul style="list-style-type: none"> ○ Mail the deficiency letter with the original signature to the institutions contact person and owner(s); maintain a copy with the application packet. <p>The institution is given one opportunity to correct identified deficiencies. If the application does not demonstrate compliance after the deficiency letter has been forwarded, consult with the licensing manager and discuss possibility of issuing a denial..</p>	
<p>4. Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> ● Prepare memorandum to Licensing Manager; <ul style="list-style-type: none"> ○ In the G drive, follow this path: G:\PE\LICENSING\Accredited Approvals\Addition of a Separate Branch\Manual Addition of a Separate Branch.doc ● Prepare approval letter <ul style="list-style-type: none"> ○ In the G drive, follow this path: G:\PE\LICENSING\Accredited Approvals\Addition of a Separate Branch\Manual Addition of a Separate Branch.doc ○ Using the template, change the information in the highlighted fields to reflect information specific to the institution. <p>Updating the Applications Processing Database in SAIL</p> <ul style="list-style-type: none"> ● In the "Applications Processing" screen, enter the application number and click on "Go". Verify the following: <ul style="list-style-type: none"> ○ The institution code should be linked to the application; you can confirm this by making sure the "Institution Code" field is completed in the application detail screen ○ Confirm that the address for the proposed branch campus has been correctly entered into SAIL; the address should be identical to that listed on the letter from the accrediting agency. ● Click on the "Application Specific Information" filed located in the bottom right corner of the screen <ul style="list-style-type: none"> ○ Enter the "Site Approval Effective Date" ○ Click on "Save Work" field located in the bottom left hand corner of the screen ● Click on "General Information" to return to "Application Detail" screen ● In the "Current Status" field, select "Approved" from the drop-down menu. 	<p>SSA/AGPA</p>

- Click on “Status Date” field. A pop-up box will appear asking if you would like to approve. Click “OK”.
- A pop-up box with the school code will appear; click on “OK”
- A pop-up box will appear asking if you would like to go to the Branch. Click “OK”.

Print Approved Programs and Locations

- In SAIL click on the “Report Center” tab
 - Look under the “Official Bureau Documents” section
 - Click on “Official Approved/Registered Programs List” box
 - Click “Print”
 - Using the method above, print the “Approved Branch/Satellite Location List”.

5. Notification to Institution (perform ONE of the following)

Mail Approval Letter

- Make a copy of the signed approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable).
- Mail letter with original signature and Approved/Registered Programs List to school’s mailing address.
- Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school’s file.

Prepare Denial Letter

- If application is denied prepare denial letter.
 - In the G drive, follow this path: [BPPE/Licensing/Denial/Denial Template](#)
- Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution.
- Forward letter to Licensing Manager. The Licensing Manager will review for accuracy and the forward to the Licensing Chief for signature.
- When denial letter is returned with signature of Licensing Chief, forward the entire file to the Denial Liaison.

Proceed to “Completed Application” section.

SSA/AGPA

Note:

For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC), BPPE approval or denial letter must be forwarded to Christine Jones at BBC by email (Christine.Jones@dca.ca.gov), and a cc to the Licensing Manager is required. You may forward an unsigned version of the approval letter; it is not necessary to scan the document with the licensing manager’s signature.

SSA/AGPA



Bureau for Private Postsecondary Education Procedure

If an approved institution adds a branch within 5 miles of a main or branch campus, or if the branch location is being added during the processing of an initial application for approval to operate, an "Add a Branch" application is <u>not</u> required.	
6. File Completed Application <ul style="list-style-type: none">• Place application in institution's permanent file. Refer to "File Organization" section for instructions.	SSA/AGPA



Bureau for Private Postsecondary Education Procedure

Title: Change Educational Objectives Application by Means of Accreditation	Supersedes: July 3, 2013	Procedure #: 2013-0013
Policy Owner: Licensing Unit	Effective: Immediately	Page: 1 of 6
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Change Educational Objectives Application and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

Productivity Benchmark: Approximately 1 hours of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
1. Routine Verification Audits ❖ Current Valid Approval ○ In the “Schools’ General Information” screen, click on the	SSA/AGPA

“Approval” tab to check the school’s expiration date. An application for change in educational objectives will not be approved for an institution with an expired approval.

- If institution’s approval to operate has expired, notify institution that an application for renewal must be submitted (if eligible, refer to “Renewal Notification Process section”).
 - If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status.
 - If more than six months have passed since the institution’s approval to operate has expired, the institution must submit a new application (renewal is not an option). Call or forward written correspondence to inform school of the expired approval status.

❖ Pending Complaints

- In the ‘Schools’ General Information’ screen in SAIL, click on “Enforcement”
- Open and closed complaints will be displayed; if the “Date Closed” field is empty, the complaint is open.
- If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. “Are there any violations that Licensing should be aware of prior to granting an approval?”

❖ Revenue Tracking

- Check for past due STRF assessments or Annual Fees.
 - In the “Schools’ General Information” screen click on “Revenue Tracking”.
- If any of the above noted fees are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices. To print invoices click on the “Invoice #” field next to the invoice that is outstanding. This will prompt the invoice to print.

<p>❖ Pending Applications</p> <ul style="list-style-type: none"> ○ Check SAIL for other pending applications for the institution. <ul style="list-style-type: none"> ▪ In the 'School's General Information' screen, click on the "Applications" tab. ▪ Scroll down to determine if there are pending applications; check the "App Status" field. If applications are pending, this field will read "Receipt letter sent" or "Pending". ▪ If a pending application is unassigned, pull the application and review concurrently. 	
<p>2. Application Review</p> <ul style="list-style-type: none"> ● The application must be an original, not a reproduction (sometimes schools reproduce the application, changing the formatting, etc.). ● Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application. ● The application must have original signatures; photocopied signatures are not acceptable. ● Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicted on the application. The application must include a copy of the current verification of accreditation granted by the accrediting agency; document must reflect approval for the program(s) including clock hours or units. ● Verify if any of the programs require another agencies approval by checking the "Concurrent Approvals List" in the G Drive at the following path: <ul style="list-style-type: none"> ○ \\OPPE\LICENSING\Accredited Approvals\Concurrent Approvals.xls ● If the application is incomplete, prepare a deficiency letter as follows: <ul style="list-style-type: none"> ○ In the G drive, follow this path: \\OPPE\LICENSING\Accredited Approvals\Change in Educational Objectives\Deficiency, Change.edu obj.docx ○ Using the template, modify as applicable to the institution's specific deficiencies. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter. ○ Mail the deficiency letter with the original signature to the institution contact person and owner(s); maintain a copy with 	<p>SSA/AGPA</p>

<p>the application packet.</p> <p>The institution is given two opportunities to correct identified deficiencies. If the application does not demonstrate compliance after the second deficiency letter has been forwarded, consult with licensing manager and discuss possibility of issuing a denial.</p>	
<p>3. Forward to Licensing Manager for Review</p> <ul style="list-style-type: none"> • Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> • In the G drive, follow this path: [REDACTED] [REDACTED] [REDACTED] • Prepare approval letter • In the G drive, follow this path: [REDACTED] [REDACTED] • Using the template, change the information in the highlighted fields to reflect information specific to the institution. • Forward to licensing manager for signature. • Updating the Applications Processing Database in SAIL <ul style="list-style-type: none"> • In the 'Applications Processing' screen, enter the application number and click on "Go". • Click "Application Specific Information". • Enter information for each field with **. • "Date Program Approved" is day approving application; cannot be backdated. • Click "Save Work!" • Click "General Information". • In the "Current Status" field, select "Approved" or "Denied" from the drop-down menu. • Click in "Status Date" box. • "Modification Confirmation" Box will appear; read and select 'Yes'. • "Schools Automated Information Link" box will appear; read and click 'OK'. • "Where Would You Like to Go" box will appear; read and click 'Yes'. • Check to see if program was approved by selecting "Programs". Click on program title entered by clicking in box. Arrow will appear in right side of program title box. Click on 	<p>SSA/AGPA</p>

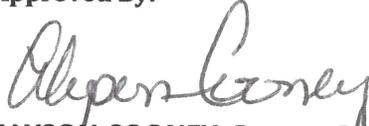
arrow to see specifics on program.

- SAIL will auto-approve as “Degree”. If non-degree you must update. If updating - change to “Non-Degree” then hit “Save Work”.
- “Update Program Type” box will appear. Read and click “Yes”.
- “Reason for Modification” box will appear. Enter “Input error” as reason, then click ok.
- Click “Save Work” and close program window.
- If additional programs need to be added, follow Step #6.
- If no additional programs are approved, skip Step 6 and in the “Schools Information” screen, proceed with Step #7.
- **Entering the Change in Educational Objectives in SAIL (for approved applications)**
- In the “School’s Information” screen, enter the school code and click on “Go”.
- Click on the “Add a School Item” field.
- Click on “Add a Program”. Enter the following:
 - Program name/course title
 - Date program approved
 - Application number
 - Program type – select from drop down box (degree, exempt or non-degree)
 - Click “Submit”
- A new screen will open; enter information into or place a check mark in the following fields:
 - “Residential/Traditional Setting” (this indicates instructional delivery takes place in a classroom)
 - “Distance Learning” – if institution has distance learning programs check the box in this field
 - “Length of instruction” – indicate program length in hours or credits/units
 - “Concurrent approval required by” – if concurrent approval is required by another agency, enter the agency’s information in this field
 - “Description” – use the drop down box to choose the appropriate program type
 - Click “Save Work”
- Repeat process for each additional program
- **Print Approved Programs and Locations**
- In SAIL click on the “Report Center” tab
 - Look under the “Official Bureau Documents” section
 - Click on “Official Approved/Registered Programs List” box
 - Click “Print”

<ul style="list-style-type: none"> • Using the method above, print the “Approved Branch/Satellite Location List” if applicable • Update SAIL • Enter the “Application Number” in the application query section of SAIL. • Press “add comment”. • Type: Application forwarded to next level of review for Approval or Denial and the date. • Submit complete package to Licensing Manager for review. • After the application is returned by the Licensing Manager Go back into the comments and type: Returned from Manager and enter the date. • If licensing manager determines additional information is required, prepare deficiency letter (refer to “Application Review” section). Update SAIL (refer to “Updating SAIL” section). 	
<p>4. Notification to Institution (perform one of the following)</p> <ul style="list-style-type: none"> ○ After signed letter is returned by licensing manager, forward copy with original signature to institution and maintain a copy for the institution’s file. <p>Prepare denial letter</p> <ul style="list-style-type: none"> • In the G drive, follow this path: BPPE/Licensing/Denial/Denial Template • Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution. • Forward letter to Licensing Manager. The Licensing Manager will review for accuracy and the forward to the Licensing Chief for signature. • When denial letter is returned with signature of Licensing Chief, forward the entire file to the Denial Liaison. <p><i>Note: For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC), BPPE approval or denial letter must be forwarded to Christine Jones at BBC by email (Christine.Jones@dca.ca.gov), and a cc to the Licensing Manager is required. You may forward an unsigned version of the approval letter; it is not necessary to scan the document with the licensing manager’s signature.</i></p>	SSA/AGPA
<p>5. File Completed Application</p> <ul style="list-style-type: none"> • Place application in institution’s permanent file <p>Refer to “File Organization” section for instructions</p>	SSA/AGPA



Bureau for Private Postsecondary Education Procedure

Title: Change of Ownership Application Processing for Institutions Approved by Means of Accreditation	Supersedes: July 3, 2013	Procedure #: 2013-0014
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 6
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.

Purpose: Describes the tasks associated with processing the Change of Ownership Application for Institutions Approved by Means of Accreditation and how that application should be handled and reviewed.

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

Productivity Benchmark: Approximately 1 hour of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
1. Routine Verification Audits <ul style="list-style-type: none"> • Current Valid Approval <ul style="list-style-type: none"> ○ In the “Schools’ General Information” screen, click on the 	SSA/AGPA

“Approval” tab to check the school’s expiration date.

- If institution’s approval to operate has expired, notify institution that an application for renewal must be submitted. New applications will not be approved for institutions with an expired approval.
- **Check SAIL to determine if institution’s approval to operate is valid**
 - In SAIL, click on the “Schools Information” tab
 - Enter the institution’s school code
 - The screen that is displayed will include the institution’s approval expiration date; check the date for validity of approval
 - If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status.
 - If more than six months have passed since the institution’s approval to operate has expired, there institution must submit a new application (renewal is not an option). Call or forward written correspondence to inform school of the expired approval status.
- **Pending Complaints**
 - In the “Schools’ General Information” screen in SAIL, click on “Enforcement”.
 - Open and closed complaints will be displayed; if the “Date Closed” field is empty, the complaint is open.
 - If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. “Are there any violations that Licensing should be aware of prior to granting an approval?”
- **Revenue Tracking**
 - Check for past due STRF assessments or Annual Fees.
 - In the “School’s General Information” screen click on “Revenue Tracking”.
 - If any of the above noted fees are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and

<p>include copies of applicable invoices.</p> <ul style="list-style-type: none"> ● Pending Applications <ul style="list-style-type: none"> ○ Check SAIL for other pending applications for the institution. <ul style="list-style-type: none"> ▪ In the “School’s General Information” screen, click on the “applications” tab. ▪ Scroll down to determine if there are pending applications; check the ‘App Status’ field. If applications are pending, this field will read ‘Receipt letter sent’ or ‘Pending’. ▪ Pull pending application(s) and review if not already assigned to an analyst. 	
<p>2. Application Review</p> <ul style="list-style-type: none"> ● The application must be an original, not a reproduction (sometimes schools reproduce the application, changing the formatting, etc.). ● Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application. ● The application must have original signatures; photocopied signatures are not acceptable. ● Each section of the application must be filled out completely as applicable, and accompanied by the applicable attachments as indicated on the application. The application must include a copy of the current verification of accreditation granted by the accrediting agency; document must reflect the change in ownership. ● Verify the following when applicable <ul style="list-style-type: none"> ○ Corporation status - confirm that corporation is in good standing (active) on the CA Secretary of State website: [REDACTED] ○ Using SAIL, perform an ownership check to determine if other institutions are owned by the proposed owner(s), and if so, if the institution is in good standing with the Bureau. If results are positive and there are identified problems with the institution(s) consult with licensing manager. <ul style="list-style-type: none"> ▪ In “Schools Information” click on “Other Searches” ▪ Click on the “Ownership Searches” field. 	<p>SSA/AGPA</p>

Bureau for Private Postsecondary Education Procedure

<ul style="list-style-type: none"> ▪ Type the owner's last name in the field titled "Owner Name Search Parameter", then click on "search". <p>If the individual is owner of another institution, that information will be displayed.</p> <p>For the deficiency letter:</p> <ul style="list-style-type: none"> • If the application is incomplete, prepare a deficiency letter as follows: <ul style="list-style-type: none"> ○ In the G drive, follow this path: <ul style="list-style-type: none"> [Redacted Path] [Redacted Path] [Redacted Path] ○ Using the template, modify as applicable to the institution's specific deficiencies. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter. ○ Mail the deficiency letter with the original signature to the institution contact person and owner(s); maintain a copy with the application packet. • The institution is given one opportunity to correct identified deficiencies. If the application does not demonstrate compliance after the deficiency letter has been forwarded, consult with the licensing manager and discuss possibility of issuing a denial. 	
<p>3. Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> • Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> • In the G drive, follow this path: <ul style="list-style-type: none"> [Redacted Path] [Redacted Path] [Redacted Path] [Redacted Path] <p>Prepare approval letter</p> <ul style="list-style-type: none"> • In the G drive, follow this path: <ul style="list-style-type: none"> [Redacted Path] [Redacted Path] [Redacted Path] ○ Using the template, change the information in the highlighted fields to reflect information specific to the institution. 	<p>SSA/AGPA</p>

<p>Entering the Change of Ownership in SAIL</p> <ul style="list-style-type: none"> • In the “Schools’ General Information” screen, enter the school code and click on “Go”. • Click on “Add a School Item”. • Click on “Add an Owner”. • A box will appear asking “Would you like to replace all current owners with this new owner?” Click “yes”. • Enter the new owner(s) name(s), corporation name if applicable, address, telephone number, date ownership began and percentage of ownership. Click “Submit”. • Enter as applicable: parent company, business type, state of incorporation, date of incorporation, FEIN or SSN. • Click on “Save Work”. <p>The “Active Ownership” field must read “True”; this indicates the name(s) of the <u>current</u> owner(s). The word “False” in this field indicates the name(s) of the previous owner(s).</p>	
<p>4. Update SAIL</p> <ul style="list-style-type: none"> • Enter the “Application Number” in the application query section of SAIL. • Press add comment. • Type : Application forwarded to next level of review for Approval or Denial and the date. • Submit complete package to Licensing Manager for review. • After the application is returned by the Licensing Manager Go back into the comments and type: Returned from Manager and enter the date. • If licensing manager determines additional information is required, prepare deficiency letter (refer to “Application Review” section). Update SAIL (refer to “Updating SAIL” section). 	<p>SSA/AGPA</p>
<p>5. Mail Approval Letter</p> <ul style="list-style-type: none"> • Make a copy of the approval letter and the Approved/Registered Programs List (and the “Approved Branch/Satellite Location List” if applicable). • Mail letter with original signature and Approved/Registered Programs List to school’s mailing address. • Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school’s file. 	<p>SSA/AGPA</p>



Bureau for Private Postsecondary Education Procedure

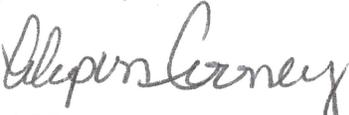
6. Completed Application

- Place application in institution's permanent file.
 - Refer to "File Organization" for instructions.

SSA/AGPA



Bureau for Private Postsecondary Education Procedure

Title: Renewal Application for Approval to Operate for an Accredited Institution	Supersedes: July 3, 2013	Procedure #: 2013-0015
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 6
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Renewal Application for Approval to Operate for an Accredited Institution and how that application should be handled and reviewed.*

An institution that is accredited by an accrediting body recognized by the United States Department of Education that has not previously obtained approval by means of accreditation cannot submit an application for renewal as an accredited institution.

If the institution has approval to operate as a non-accredited institution, and requests to operate as an accredited institution, an Application for Approval to Operate an Accredited Institution must be submitted.

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

Productivity Benchmark: Approximately 2 hours of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.



Bureau for Private Postsecondary Education Procedure

Procedures:

Task	Who is Responsible
<p>1. Routine Verification Audits</p> <p>Pending Complaints</p> <ul style="list-style-type: none"> ○ In the “Schools’ General Information” screen in SAIL, click on “Enforcement”. ○ Open and closed complaints will be displayed; if the “Date Closed” field is empty, the complaint is open. ○ If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. “Are there any violations that Licensing should be aware of prior to granting an approval?” <p>Revenue Tracking</p> <ul style="list-style-type: none"> ○ Check for past due STRF assessments or Annual Fees <ul style="list-style-type: none"> ▪ In the “School’s Information” screen enter the school code and press “Go”. ▪ Click on “Revenue Tracking”. ▪ If annual fees or STRF assessments are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices. To print invoices click on the “Invoice #” field, next to the invoice that is outstanding. This will prompt the invoice to print. <p>Pending Applications</p> <ul style="list-style-type: none"> ○ Check SAIL for other pending applications for the institution. <ul style="list-style-type: none"> ▪ In the “School’s General Information” screen, click on the “Applications” tab. ▪ Scroll down to determine if there are pending applications; check the “App Status” field. If applications are pending, this field will read “Receipt letter sent” or “Pending”. ▪ If the institution has applications pending analyst assignment, pull the application and review all applications concurrently. 	<p>SSA/AGPA</p>

<p>2. Application Review</p> <ul style="list-style-type: none"> • The application must be an original, not a reproduction (sometimes schools reproduce the application, changing the formatting, etc.). • Confirm that the correct application fee has been submitted once the duplicate copy has been received from cashiering; the required application fee is listed on the first page of the application. • The application must have original signatures; photocopied signatures are not acceptable. • Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicted on the application. The application must include a copy of the current (dated within the past 6 months) verification of accreditation granted by the accrediting agency; document must reflect the new term of accreditation. 	<p>SSA/AGPA</p>
<p>3. Accrediting Agency Verification</p> <ul style="list-style-type: none"> ▪ Verify that accrediting agency is recognized by the United States Department of Education using the following link: [Redacted URL] ▪ If the accrediting agency is <u>not</u> recognized by the United States Department of Education the application must be denied. (proceed to application denial section) ▪ If the accrediting agency is recognized by the US Department of Education, the letter of accreditation must include the following information: <ul style="list-style-type: none"> ▪ Address for approved main, branch and satellite campuses ▪ Current ownership information ▪ Approved programs with clock hours/credit units for the main, branch and satellite campuses ▪ Term of accreditation–mm/dd/year (If letter includes only month and year, approve until last day of month) 	<p>SSA/AGPA</p>
<p>4. Incomplete Application</p> <ul style="list-style-type: none"> • If the application is incomplete or deficient, prepare a deficiency letter as follows: <ul style="list-style-type: none"> ○ In the G drive, follow this path: [Redacted Path] ○ Using the template, modify as applicable to the institution’s specific deficiencies. Save a copy of the letter in your directory, using the “save as” feature, so as to maintain the 	<p>SSA/AGPA</p>

<p>integrity of the template letter.</p> <p>Mail the deficiency letter with the original signature to the institution contact person and owner(s). Maintain a copy for the Bureau's record.</p>	
<p>5. Updating the Applications Processing Database for Approved Applications</p> <ul style="list-style-type: none"> • In SAIL in the "Applications Processing" screen, enter the application number and click on "Go". • Verify application detail screen is filled out completely including the revenue tracking information. • In the "Current Status" field, select "Approved" from the drop down box. • Click in "Status Date" box. <ul style="list-style-type: none"> ○ -"Status Modification" Box will appear; read and click 'Yes'. ○ Click "Save Work". <p>Click on "Save and Exit".</p>	SSA/AGPA
<p>6. Updating SAIL</p> <p>Add institutional approval</p> <ul style="list-style-type: none"> • In the "Schools Information" screen, enter the school code • Click on "Add School Item". • Click on "Add Institutional Approval". <ul style="list-style-type: none"> ○ Enter the "Qualifying Application Number" ○ Enter the Institutional Approval Status as "Accredited Institutional Approval". ○ Institutional Approval date will automatically be entered as today's date. (The approval date cannot be back dated) ○ Enter the institutional approval expiration date listed on the letter of accreditation. ○ Click "Submit" ○ Pop-up will appear "Successfully Submitted Approval" and click "Ok". ○ Close window to go back to original screen. 	SSA/AGPA
<p>7. Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> • Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> ○ In the G drive, follow this path: <ul style="list-style-type: none"> Br [REDACTED] [REDACTED] [REDACTED] [REDACTED] <p>Prepare approval letter</p> <ul style="list-style-type: none"> • In the G drive, follow this path: [REDACTED] Approval\ [REDACTED] of Approval to Special Accredited 	SSA/AGPA

<p>Institution Renewal Approval Accredited Template Letter.doc</p> <ul style="list-style-type: none"> Using the template, change the information in the highlighted fields to reflect information specific to the institution. <p>Print Approved Programs and Locations</p> <ul style="list-style-type: none"> In the SAIL "Schools' General Information" screen click on the "Report Center" tab. Look under the "Official Bureau Documents" section. Click on "Official Approved/Registered Programs List" box. Click "Print". <p>Using the method above, print the "Approved Branch/Satellite Location List" if applicable.</p> <ul style="list-style-type: none"> Update SAIL <ul style="list-style-type: none"> Enter the "Application Number" in the application query section of SAIL. Press add comment. Type: Submitted to next level of review for Approval or Denial. Submit complete package to Licensing Manager for review. After the application is returned by the Licensing Manager Go back into the comments and type: Returned from Manager. If licensing manager determines additional information is required, prepare deficiency letter (refer to "Application Review" section). Update SAIL (refer to "Updating SAIL" section). 	
<p>8. Notification to Institution (perform ONE of the following)</p> <p>Mail approval letter</p> <ul style="list-style-type: none"> Make a copy of the signed approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable). Mail letter with original signature and Approved/Registered Programs List to school's mailing address. Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school's file. Proceed to "Completed Application" section. <p>Prepare denial letter.</p> <ul style="list-style-type: none"> In the G drive, follow this path: _____ _____ Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution. Forward letter to Licensing Manager. 	<p>SSA/AGPA</p>



Bureau for Private Postsecondary Education Procedure

- When denial letter is returned with signature of Licensing Manager, forward copies to institution; mail one copy by regular mail and the other by certified mail.
- Give the entire application packet to the Licensing Manager.

Note: For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC), BPPE approval or denial letter must be forwarded to Christine Jones at BBC by email (Christine.Jones@dca.ca.gov), and a cc to the Licensing Manager is required. You may forward an unsigned version of the approval letter; it is not necessary to scan the document with the licensing manager's signature.

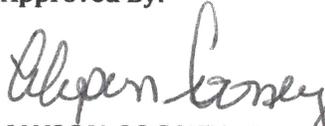
9. File Completed Application

- Place application in institution's permanent file.
Refer to "File Organization" section for instructions.

SSA/AGPA



Bureau for Private Postsecondary Education Procedure

Title: Application for Change of Business Organization/Control/Ownership	Supersedes: March 7, 2013	Procedure #: 2013-0016
Policy Owner: Licensing Unit	Effective: Immediately	Page: 1 of 6
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Change of Ownership Application and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

Productivity Benchmark: Approximately 2 hours of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
1. Routine Verification Audits Current Valid Approval <ul style="list-style-type: none"> ○ In the “Schools’ General Information” screen, click on the “Approval” tab to check the school’s expiration date. An application for change of ownership will <u>not</u> be approved for 	SSA/AGPA

an institution with an expired approval.

- If institution's approval to operate has expired, notify institution that an application for renewal must be submitted.
 - If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status.
 - If more than six months have passed since the institution's approval to operate has expired, the institution must submit a new application (renewal is not an option). Call or forward written correspondence to inform school of the expired approval status.

Pending Complaints

- In the "Schools' General Information" screen in SAIL, click on "Enforcement".
- Open and closed complaints will be displayed; if the "Date Closed" field is empty, the complaint is open.
- If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. "Are there any violations that Licensing should be aware of prior to granting an approval?"

Revenue Tracking

- Check for past due STRF assessments or Annual Fees
 - In the "School's General Information" screen click on "Revenue Tracking".
 - If annual fees or STRF assessments are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices. To print invoices click on the "Invoice #" field, next to the invoice that is outstanding. This will prompt the invoice to print.

Pending Applications

- Check SAIL for other pending applications for the institution.
 - In the "School's General Information" screen, click on the "Applications" tab.
 - Scroll down to determine if there are pending applications; check the "App Status" field. If applications are pending, this field will read "Receipt

<p>letter sent” or “Pending”.</p> <ul style="list-style-type: none"> ▪ Pull pending application(s) and review if not already assigned to an analyst. 	
<p>2. Application Review</p> <ul style="list-style-type: none"> • The application must be an original, not a reproduction (sometimes schools reproduce the application, changing the formatting, etc.). • Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application. • The application must have original signatures; photocopied signatures are not acceptable. • Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicated on the application. Use the “Change of Ownership” application review checklist to complete the application review. <p>If Deficient:</p> <ul style="list-style-type: none"> • Verify the following when applicable <ul style="list-style-type: none"> ○ Corporation status - confirm that corporation is in good standing (active) on the CA Secretary of State website: http://www.sos.ca.gov/ ○ Using SAIL, perform an ownership check to determine if other institutions are owned by the proposed owner(s), and if so, if the institution is in good standing with the Bureau. If results are positive and there are identified problems with the institution(s) consult with licensing manager. <ul style="list-style-type: none"> ▪ In “Schools Information” click on “Other Searches” ▪ Click on the “Ownership Searches” field ▪ Type the owner’s last name in the field titled “Owner Name Search Parameter”, then click on “search” ▪ If the individual is owner of another institution, that information will be displayed • If the application is incomplete, prepare a deficiency letter as follows: <ul style="list-style-type: none"> ○ In the G drive, follow this path: BPPE/Licensing/Non-Accredited Approval/Change of Business Organization 	<p>SSA/AGPA</p>

Bureau for Private Postsecondary Education Procedure

<p>Control Ownership/Change of Business Organization Deficiency Letter</p> <ul style="list-style-type: none"> ○ Using the template, modify as applicable to the institution's specific deficiencies. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter. ○ Mail the deficiency letter with the original signature to the institution; maintain a copy with the application packet. ● The institution is given one opportunity to correct identified deficiencies. If the application does not demonstrate compliance after the deficiency letter has been forwarded, consult with the licensing manager and discuss possibility of issuing a denial. 	
<p>3. Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> ● Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> ○ In the G drive, follow this path: PPPE/Licensing/Non Accredited Approval/Change of Business Organization ● Update SAIL/Submit Application <ul style="list-style-type: none"> ○ Submit complete package to Licensing Manager for review. ○ Update SAIL to reflect the current application status. ● If licensing manager determines additional information is required, prepare deficiency letter (refer to "Application Review" section). Update SAIL (refer to "Updating SAIL" section). 	SSA/AGPA
<p>4. Notification to Institution (perform ONE of the following)</p> <p>Prepare approval letter</p> <ul style="list-style-type: none"> ● In the G drive, follow this path: PPPE/Licensing/Non Accredited Approval/Change of Business Organization ● Using the template, change the information in the highlighted fields to reflect information specific to the institution. ● Forward to licensing manager for signature. ● Make a copy of the signed approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable). 	SSA/AGPA

<p>Prepare denial letter</p> <ul style="list-style-type: none"> • In the G drive, follow this path: G:\Information Systems\Denials\Denial Template • Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution. • Forward letter to Licensing Manager. The Licensing Manager will review for accuracy and the forward to the Licensing Chief for signature. • When denial letter is returned with signature of Licensing Chief, forward the entire file to the Denial Liaison. <p><i>Note: For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC), BPPE approval or denial letter must be forwarded to Christine Jones at BBC by email (christine.jones@bbc.ca.gov) and a cc to the Licensing Manager is required. You may forward an unsigned version of the approval letter; it is not necessary to scan the document with the licensing manager's signature.</i></p>	
<p>5. Entering the Change of Ownership in SAIL (for approved applications)</p> <ul style="list-style-type: none"> • In the "Schools' General Information" screen click on "Add a School Item". • Click on "Add an Owner" • A box will appear asking "Would you like to replace all current owners with this new owner?" Click "Yes". • Enter the new owner(s) name(s), corporation name if applicable, address, telephone number, date ownership began and percentage of ownership. Click "Submit". • Enter as applicable: parent company, business type, state of incorporation, date of incorporation, FEIN or SSN. • Click on "Save Work". <p>The "Active Ownership" field must read "True"; this indicates the name(s) of the <u>current</u> owner(s). The word "False" in this field indicates the name(s) of the previous owner(s).</p>	SSA/AGPA
<p>6. Print Approved Programs and Locations</p> <ul style="list-style-type: none"> ○ In the SAIL "Schools' General Information" screen click on the "Report Center" tab ○ Look under the "Official Bureau Documents" section ○ Click on "Official Approved/Registered Programs List" box ○ Click "Print" ○ Using the method above, print the "Approved Branch/Satellite Location List" if applicable. 	SSA/AGPA
<p>7. Updating the Applications Processing Database in SAIL</p> <ul style="list-style-type: none"> • In the "Applications Processing" screen, enter the application number and click on "Go". 	SSA/AGPA

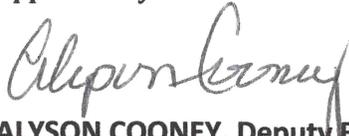


Bureau for Private Postsecondary Education Procedure

<ul style="list-style-type: none">• In the “Current Status” field, select “Approved” or “Denied” from the drop-down menu.• Click on “Save Work”.• Click on “Save and Exit”.	
8. Mail Approval Letter <ul style="list-style-type: none">• Make a copy of the approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable).• Mail letter with original signature and Approved /Registered Programs List to school’s mailing address.• Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school’s file.	SSA/AGPA
9. File Completed Application <ul style="list-style-type: none">• Place application in institution’s permanent file.<ul style="list-style-type: none">○ Refer to “File Organization” section for instructions.	SSA/AGPA



Bureau for Private Postsecondary Education Procedure

Title: File Organization	Supersedes: July 3, 2013	Procedure #: 2013-0017
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 2
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with organizing the file. If a newly approved application is for a school that previously had an assigned school code, the old school file must be pulled from the file room and re-organized (in most cases). The purpose of this process is to maintain materials which represent a current and accurate school file.*

Definitions: *Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.*

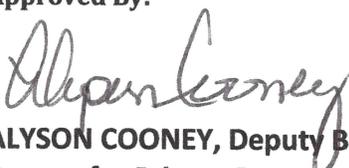
Procedures:

Task	Who is Responsible
1. All of the items listed below must be maintained permanently: <ul style="list-style-type: none"> • Applications; place in file is ascending order, oldest application on bottom. • Approval letters and approval documents; may only be discarded if a corrected copy replaces it. • School site visitation reports • Any forms that are vital for legal documentation (if in doubt, ask Licensing Manager for assistance) • General correspondence 	OT/SSA/AGP A/Ed Spec
2. Not subject to retention: <ul style="list-style-type: none"> • Cover letters that accompanied the application or subsequent correspondence from the school (Make sure the cover letter does not contain any information that is required to be maintained before disposing of). 	OT/SSA/AGP A/Ed Spec

Bureau for Private Postsecondary Education Procedure

<ul style="list-style-type: none"> ● Outdated enrollment agreements and catalogs, once replaced by current copies. 	
<p>3. File Format</p> <ul style="list-style-type: none"> ● An individual file folder is required for each institution ● Each file should be organized as follows: <ul style="list-style-type: none"> ○ A brown expandable folder contains the institution's application(s) and all supporting documents, evidence, and correspondence related to the application review. ○ A red folder contains confidential information, such as financial documents and complaints ○ A green sectioned file folder will include the following: <ul style="list-style-type: none"> ▪ Flap 1 – General correspondence, accreditation letters, student inquiries ▪ Flap 2 – Approval letter/documents and memorandum indicating management approval, approval letters and any type of amendment ▪ Flap 3 – Financial Analysis sheets, annual fee letters 	<p>OT/SSA/AGP A/Ed Spec</p>

Bureau for Private Postsecondary Education Procedure

Title: Non-substantive Changes <ul style="list-style-type: none"> • change of location of less than 10 miles; • add a program related to the approved programs offered by the institution; • add a new branch five miles or less from a main or branch campus; • add a satellite; • change of mailing address. 	Supersedes: July 3, 2015	Procedure #: 2013-0018
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 10
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Non-substantive Changes and how those applications should be handled and reviewed. An institution shall notify the Bureau of a non-substantive change including: change of location of less than 10 miles; addition of a program related to the approved programs offered by the institution; addition of a new branch five miles or less from a main or branch campus; addition of a satellite; and change of mailing address. All such notifications shall be made within 30 days of the change and sent to the Bureau, in writing.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Productivity Benchmark: Approximately 30 minutes of staff time to complete the initial review.

Procedures:

Task	Who is Responsible
<p>Change of Location</p>	<p>OT</p>
<p>1. Routine Verification Audits</p> <ul style="list-style-type: none"> • Check SAIL to determine if institution’s approval to operate is valid <ul style="list-style-type: none"> ○ In SAIL, click on the “Schools Information” tab ○ Enter the institution’s school code ○ The screen that is displayed will include the institution’s approval expiration date; check the date for validity of approval <ul style="list-style-type: none"> ▪ If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status. ▪ If more than six months have passed since the institution’s approval to operate has expired, the institution must submit a new application (renewal is not an option). Call or forward written correspondence to inform school of the expired approval status. ○ Check SAIL to confirm the person requesting the change has the authority to make such changes. 	<p>OT</p>
<p>2. Verify Distance between Current and Proposed Locations</p> <ul style="list-style-type: none"> • Using MapQuest driving directions, perform a search to determine the distance between the current location and the proposed location; the distance between both locations must be less than ten miles in order for the change to be non-substantive. <ul style="list-style-type: none"> ○ Go to www.mapquest.com ○ Click on “Get Directions”. ○ Enter the address of the current location on the first line; enter the address of the proposed location on the second line. ○ Click the “Print” icon that is above the map on the page. ○ Using the printing options; place a check mark on “helpful hints”, “maps” and “advertisement”. <p>Click on “Print Page”</p>	<p>OT</p>

<p>3. Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> • Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> ○ In the G drive, follow this path: • If licensing manager determines additional information is required, prepare deficiency letter 	
<p>4. Entering the Change of Address in SAIL</p> <ul style="list-style-type: none"> • In the “School’s Information” screen, enter the school code and click on “Go”. <ul style="list-style-type: none"> • Click on the “School Physical Address” field. Update address. • If the mailing address differs from the physical address, click on the “School Mailing Address” field and update address. • Change telephone number if applicable. <p>Click on “Save Work”.</p>	OT
<p>5. Print Approved Programs and Locations</p> <ul style="list-style-type: none"> • In SAIL click on the “Report Center” tab <ul style="list-style-type: none"> ○ Look under the “Official Bureau Documents” section ○ Click on “Official Approved/Registered Programs List” box ○ Click “Print” <p>Using the method above, print the “Approved Branch/Satellite Location List” if applicable.</p>	OT
<p>6. Notification to Institution</p> <ul style="list-style-type: none"> • In the G drive, follow this path: BPPE/Licensing/Non Accredited Approval/Non-substantive Changes/Change of Location Less than Ten Miles <ul style="list-style-type: none"> ○ Using the template, modify the letter in the highlighted areas. Save a copy of the letter in your directory, using the “save as” feature, so as to maintain the integrity of the template letter. ○ Mail letter with original signature and Approved/Registered Programs List to school’s mailing address. <p>Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school’s file.</p>	OT
<p>Addition of a Program Related to the Approved Programs Offered by the Institution</p>	SSM I/Ed Spe
<p>1. Routine Verification Audits</p> <ul style="list-style-type: none"> • Check SAIL to determine if institution’s approval to operate is valid <ul style="list-style-type: none"> ○ In SAIL, click on the “Schools Information” tab ○ Enter the institution’s school code ○ The screen that is displayed will include the institution’s approval expiration date; check the date for validity of 	OT

<p>approval</p> <ul style="list-style-type: none"> ▪ If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status. <p>If more than six months have passed since the institution's approval to operate has expired, there institution must submit a new application (renewal is not an option). Call or forward written correspondence to inform school of the expired approval status.</p> <p>Check SAIL to confirm the person requesting the change has the authority to make such changes</p>	
<p>2. Program Change(s)</p> <ul style="list-style-type: none"> • Proposed program(s) must be related to the approved program(s) offered by the school; if in doubt consult with licensing manager. <p>If addition of program is appropriate, proceed as follows:</p>	OT/Ed Spec
<p>3. Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> • Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> ○ In the G drive, follow this path: <p>If licensing manager determines additional information is required, prepare deficiency letter</p>	
<p>4. Add Approved Programs</p> <ul style="list-style-type: none"> • In the SAIL "Schools' General Information" screen click on the "Add a School Item" field. • Click on "Add a Program". Enter the following: <ul style="list-style-type: none"> ○ Program name/course title ○ Date program approved ○ Application number ○ Program type – select from drop-down menu (degree, exempt or non-degree) ○ Click "Submit" • A new screen will open; enter information into/place a check mark in the following fields: <ul style="list-style-type: none"> ○ "Residential/Traditional Setting" (this indicates instructional delivery takes place in a classroom) ○ "Distance Learning" – if institution has distance learning programs check the box in this field ○ "Length of instruction" – indicate program length in hours or credits/units ○ "Concurrent approval required by" – if concurrent approval is 	OT

<p>required by another agency, enter the agency's information in this field</p> <ul style="list-style-type: none"> ○ "Description" – use the drop-down menu to choose the appropriate program type ○ Click "Save Work" <p>Repeat process for each additional program</p>	
<p>5. Print Approved Programs and Locations</p> <ul style="list-style-type: none"> ● In SAIL click on the "Report Center" tab <ul style="list-style-type: none"> ○ Look under the "Official Bureau Documents" section ○ Click on "Official Approved/Registered Programs List" box ○ Click "Print" ○ Using the method above, print the "Approved Branch/Satellite Location List" if applicable. 	OT
<p>6. Notification to Institution</p> <ul style="list-style-type: none"> ● In the G drive, follow this path: G:\Approved/Registered Programs/Template <ul style="list-style-type: none"> ○ Using the template, modify the letter in the highlighted areas. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter. ○ Mail letter with original signature and Approved/Registered Programs List to school's mailing address. ○ Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school's file. 	OT
<p>Addition of a New Branch Five Miles or Less from the Main or Branch Campus</p>	OT
<p>1. Routine Verification Audits</p> <ul style="list-style-type: none"> ● Check SAIL to determine if institution's approval to operate is valid <ul style="list-style-type: none"> ○ In SAIL, click on the "Schools Information" tab ○ Enter the institution's school code ○ The screen that is displayed will include the institution's approval expiration date; check the date for validity of approval <ul style="list-style-type: none"> ▪ If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status. <p>If more than six months have passed since the institution's approval to operate has expired, there institution must submit a new application</p>	OT

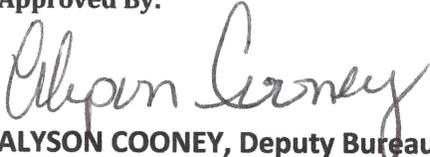
<p>(renewal is not an option). Call or forward written correspondence to inform school of the expired approval status. Check SAIL to confirm the person requesting the change has the authority to make such changes</p>	
<p>2. Verify Distance between Current and Proposed Locations</p> <ul style="list-style-type: none"> • Using MapQuest driving directions, perform a search to determine the distance between the current location and the proposed location; the distance between both locations must be less than five miles in order for the change to be non-substantive. <ul style="list-style-type: none"> ○ Go to mapquest.com ○ Click on "Get Directions" ○ Enter the address of the current location on the first line; enter the address of the proposed location on the second line ○ Click the "print" icon that is above the map on the page ○ Using the printing options; place a check mark on "helpful hints", "maps" and "advertisement". <p>Click on "Print Page"</p>	<p>OT</p>
<p>3. Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> • Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> ○ In the G drive, follow this path: <p>If licensing manager determines additional information is required, prepare deficiency letter</p>	
<p>3. Adding the branch location in SAIL</p> <ul style="list-style-type: none"> • In SAIL click on the "Applications Processing" tab. • Click on "Enter New Application". <ul style="list-style-type: none"> ○ Enter the date in the "Date Received" field. ○ In the "Application Type" field, select "Degree" from the drop-down menu. ○ In the "Application Category" field, select "Add a Branch". ○ In the "Staff Assignment" field, select assigned staff member's name from the drop-down menu. ○ In the "Institution Code" field, enter the school code for the main campus location. ○ Enter the name of the school in the "School Name" field ○ Enter the branch location address in the "Physical Address" field. ○ In the "Ledger" field, enter the six digit number that is stamped onto the application. 	<p>OT</p>

<p>approval</p> <ul style="list-style-type: none"> ▪ If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status. <p>If more than six months have passed since the institution's approval to operate has expired, there institution must submit a new application (renewal is not an option). Call or forward written correspondence to inform school of the expired approval status.</p> <p>Check SAIL to confirm the person requesting the change has the authority to make such changes</p>	
<p>2. Verify Distance between Current and Proposed Locations</p> <ul style="list-style-type: none"> • Using MapQuest driving directions, perform a search to determine the distance between the current location and the proposed location; the distance between both locations must be less than five miles in order for the change to be non-substantive. <ul style="list-style-type: none"> ○ Go to www.mapquest.com ○ Click on "Get Directions" ○ Enter the address of the current location on the first line; enter the address of the proposed location on the second line ○ Click the "print" icon that is above the map on the page ○ Using the printing options; place a check mark on "helpful hints", "maps" and "advertisement". <p>Click on "Print Page"</p>	
<p>3. Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> • Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> ○ In the G drive, follow this path: 	
<p>4. Update SAIL - Adding Satellite Location to SAIL</p> <ul style="list-style-type: none"> • In SAIL click on the "Applications Processing" tab • Click on "Enter New Application" <ul style="list-style-type: none"> ○ Enter the date in the "Date Received" field ○ In the "Application Type" field, select "Degree" from the drop-down menu ○ In the "Application Category" field, select "Add Satellite Location". ○ In the "Staff Assignment" field, select assigned staff 	<p>OT</p>

<p>member's name from the drop-down menu.</p> <ul style="list-style-type: none"> ○ In the "Institution Code" field, enter the school code for the main campus location. ○ Enter the name of the school in the "School Name" field ○ Enter the satellite location address in the "Physical Address" field ○ In the "Ledger" field, enter the six digit number that is stamped onto the application. ○ Enter the date in the "Date Received" field; this is located in the top right corner of the application. ○ Click on "Submit New Application" ● A pop-up box will appear displaying the application number, click "OK". ● Enter address and other info as needed ● In the 'Current Status' field, select 'Approved' from the drop down box. ● Click on "Status Date" field. A pop-up box will appear asking if you would like to approve. Click "OK". ● Pop-up box with school code will appear. ● A pop-up box will appear asking if you would like to go to the satellite. Click "OK". 	
<p>5. Print Approved Programs and Locations</p> <ul style="list-style-type: none"> ● In the SAIL "Schools' General Information" screen click on the "Report Center" tab <ul style="list-style-type: none"> ○ Look under the "Official Bureau Documents" section ○ Click on "Official Approved/Registered Programs List" box ○ Click "Print" <p>Using the method above, print the "Approved Branch/Satellite Location List".</p>	OT
<p>6. Notification to Institution</p> <ul style="list-style-type: none"> ● In the G drive, follow this path: BPPE/Licensing/Non-Accredited Approval/Non-substantive Changes/Addition of Satellite/Template ○ Using the template, modify the letter in the highlighted areas. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter. ○ Mail letter with original signature and Approved/Registered Programs List to school's mailing address. ○ Place a photocopy of the approval letter and a copy of the 	OT

<p>Approved/Registered Programs List in the school's file.</p>	
<p>Change of Mailing Address</p>	<p>OT</p>
<p>1. Entering the Change of Address in SAIL</p> <ul style="list-style-type: none"> • In the "School's General Information" screen, enter the school code and click on "Go". • Click on the "School Mailing Address" field. • Enter the new mailing address. • Change telephone number if applicable. <p>Enter the new address of the institution and click on "Save Work".</p>	<p>OT</p>
<p>2. Print Approved Programs and Locations</p> <ul style="list-style-type: none"> • In the SAIL "Schools' General Information" screen click on the "Report Center" tab <ul style="list-style-type: none"> ○ Look under the "Official Bureau Documents" section ○ Click on "Official Approved/Registered Programs List" box ○ Click "Print" <p>Using the method above, print the "Approved Branch/Satellite Location List" if applicable.</p>	<p>OT</p>
<p>3. Notification to Institution</p> <ul style="list-style-type: none"> • In the C drive, follow this path: BPPE/Licensing/Non Accredited Approval/Non-substantive Changes/Change of Mailing Address/Template ○ Using the template, modify the letter in the highlighted areas. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter. ○ Mail letter with original signature and Approved/Registered Programs List to school's mailing address. <p>Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school's file.</p>	<p>OT</p>

Bureau for Private Postsecondary Education Procedure

Title: Expired Approvals and the Renewal Notification Process	Supersedes: March 7, 2013	Procedures #: 2013-0019
Procedures Owner: Licensing Unit	Effective: Immediately	Page: 1 of 3
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Expired Approvals and the Renewal Notification and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Procedures:

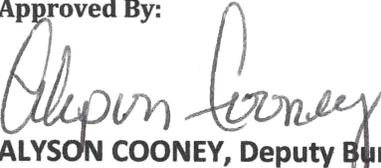
Task	Who is Responsible
1. Verify Approval Expiration Date In SAIL in the “School’s General Information” screen, click on the “Approval” tab to check the school’s expiration date.	OT
2. Update SAIL <ul style="list-style-type: none"> • In the “Schools’ General Information” screen, click on the “Applications” tab to verify if the institution has submitted an application for renewal. If a renewal application has been received, no further action is required. • If an application for renewal has not been received: • In the “Schools General Information” screen, click on “School Status” field. • Select “Expired Approval” from the drop-down menu. • Prepare a “Notice of Expiration of Approval to Operate” letter. 	OT

<ul style="list-style-type: none"> • Send the “Notice of Expiration of Approval to Operate” letter; make copies for the school file, licensing manager and Closed Schools Unit. 	
<p>3. Prepare Notice of Expiration of Approval to Operate letter</p> <ul style="list-style-type: none"> • In the G drive follow this path: <ul style="list-style-type: none"> ○ G-drive/BPPE/Licensing/Expired Notification ○ Type applicable school information on the template letter ○ Give letter(s) to Licensing Manager for signature ○ Make copy of signed letter <ul style="list-style-type: none"> ▪ Original letter mail to school ▪ Copy to be filed in School File 	OT
<p>4. Save typed letter in Expired Approval Folder</p> <ul style="list-style-type: none"> • In the G drive follow this path: <ul style="list-style-type: none"> ○ BPPE/Licensing/Expired Approval 	OT
<p>Renewal Notification Process <i>Renewal Notification letters should be sent out six months prior to the expired approval date and a second notice three months prior to the expired approval date.</i></p>	
<p>1. Verification of Expired Approval In SAIL:</p> <ul style="list-style-type: none"> • Click on “Schools Information” • Enter School Code <ul style="list-style-type: none"> ○ Press enter ○ School General Information Screen will appear; verify that the school code coincides with the correct school and check approval expiration date. If the school’s approval has expired, proceed as follows: • Click on “Applications” tab <ul style="list-style-type: none"> ○ Check to see if school has submitted an application for renewal of approval ○ If yes no further action is required at this time ○ If the school has not submitted an application for renewal, proceed as follows: 	OT
<p>2. Prepare Renewal of an Approval to Operate letter</p> <ul style="list-style-type: none"> • Template letter can be found: <ul style="list-style-type: none"> ○ G-drive/BPPE/Licensing/Expired Approval/Sent Letters-Renewal ○ Type applicable school information on the template letter ○ Give letter(s) to Licensing Manager for signature ○ Make two copies of signed letter ○ Original letter mail to school ○ Copy to be filed in School File 	OT
<p>3. Save typed letter in Expired Approval Folder</p> <ul style="list-style-type: none"> • Folder is located as follows: 	OT

	
<p>4. Update information into SAIL</p> <ul style="list-style-type: none">• Click on "Add/View Comments"• School Comment History box will appear• Click on add comment• Type "Renewal Notification letter sent"• Click on add comment	OT



Bureau for Private Postsecondary Education Procedure

Title: Change of Location Application for Institutions Approved by Means of Accreditation	Supersedes: July 3, 2013	Procedure #: 2013-0020
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 5
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Change of Location Application for Institutions Approved by Means of Accreditation and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

Productivity Benchmark: Approximately 30 minutes of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
1. Routine Verification Audits Current Valid Approval <ul style="list-style-type: none"> ○ In SAIL in the "Schools' General Information" screen, click on 	SSA/AGPA

the "Approval" tab to check the school's expiration date. An application for change of location will not be approved for an institution with an expired approval.

- If institution's approval to operate has expired, notify institution that an application for renewal must be submitted.
 - If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status.
 - If more than six months have passed since the institution's approval to operate has expired, the institution must submit a new application (renewal is not an option). Call or forward written correspondence to inform school of the expired approval status.

Pending Complaints

- In the "Schools' General Information" screen in SAIL, click on "Enforcement".
- Open and closed complaints will be displayed; if the "Date Closed" field is empty, the complaint is open.
- If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. "Are there any violations that Licensing should be aware of prior to granting an approval?"

Revenue Tracking

- Check for past due STRF assessments or Annual Fees
 - In the "Schools' General Information" screen click on "Revenue Tracking".
 - If annual fees or STRF assessments are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices. To print invoices click on the "Invoice #" field, next to the invoice that is outstanding. This will prompt the invoice to print.

Pending Applications

- Check SAIL for other pending applications for the institution.
 - In the "Schools' General Information" screen, click on the "Applications" tab.
 - Scroll down to determine if there are pending

<p>applications; check the "App Status" field. If applications are pending, this field will read "Receipt letter sent" or "Pending".</p> <ul style="list-style-type: none"> ▪ Pull pending application(s) and review if not already assigned to an analyst. 	
<p>2. Application Review</p> <ul style="list-style-type: none"> • The application must be an original, not a reproduction. • Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application. • The application must have original signatures; photocopied signatures are not acceptable. • Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicated on the application. The application must include a copy of the current verification of accreditation granted by the accrediting agency; document must reflect the change of location. <p>If Deficiency letter is needed:</p> <p>If the application is incomplete, prepare a deficiency letter as follows:</p> <ul style="list-style-type: none"> ○ In the G drive, follow this path: XXXXXXXXXX <u>Accredited Approvals/ Change of Location/Change of Location Deficiency Letter</u> ○ Using the template, modify as applicable to the institution's specific deficiencies. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter. ○ Mail the deficiency letter with the original signature to the institution contact person and owner(s); maintain a copy with the application packet. • The institution is given one opportunity to correct identified deficiencies. If the application does not demonstrate compliance after the deficiency letter has been forwarded, consult with the licensing manager and discuss possibility of issuing a denial. 	<p>SSA/AGPA</p>
<p>3. Forward to Licensing Manager for Review</p> <ul style="list-style-type: none"> • Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> ○ In the G drive, follow this path: XXXXXXXXXX <u>XXXX\LICENSING\Change of Location\XXXXXXXXXX.doc</u> 	<p>SSA/AGPA</p>

- Prepare approval letter
 - In the G drive, follow this path:
BPPE\LICENSING\y Accredited Approvals\Change of Location\ypp
 - Using the template, change the information in the highlighted fields to reflect information specific to the institution.

Updating the Applications Processing Database in SAIL

- In the "Applications Processing" screen, enter the application number and click on "Go".
- In the "Current Status" field, select "Approved" from the drop-down menu.
- Click on "Save Work".
- "Status Modification" Box will appear; read and click "OK".
 - Click on "Save and Exit".

Entering the Change of Location in SAIL

- In the "Schools' Information" screen, enter the school code and click on "Go".
- Click on the "School Physical Address" field. Update address.
- If the mailing address differs from the physical address, click on the "School Mailing Address" field and update address.
- Change telephone number if applicable.
 - Click on "Save Work".

Print Approved Programs and Locations

- In SAIL click on the "Report Center" tab.
 - Look under the "Official Bureau Documents" section.
 - Click on "Official Approved/Registered Programs List" box.
 - Click "Print".
 - Using the method above, print the "Approved Branch/Satellite Location List" if applicable.

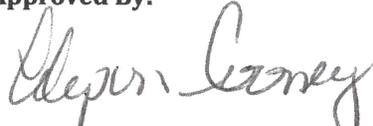
A copy of this document will be forwarded to the school with the approval letter; another copy will be placed in the school's file along with the approval letter.

Update SAIL

- Enter the "Application Number" in the application query section of SAIL.
- Press add comment.
- Type : Application forwarded to Manager for Approval or Denial and the date.
- Submit complete package to Licensing Manager for review.
- After the application is returned by the Licensing Manager Go back into the comments and type: Returned from

<p>Manager and enter the date.</p> <ul style="list-style-type: none"> • If licensing manager determines additional information is required, prepare deficiency letter (refer to “Application Review” section). Update SAIL (refer to “Updating SAIL” section). 	
<p>4. Notification to Institution (perform ONE of the following)</p> <p><u>Mail Approval Letter</u></p> <ul style="list-style-type: none"> • Make a copy of the approval letter and the “Approved/Registered Programs List” and the “Approved Branch/Satellite Location List”. • Mail letter with original signature and Approved/Registered Programs List to school’s mailing address. <p>Place a photocopy of the approval letter and a copy of the “Approved/Registered Programs List” in the school’s file.</p> <p><u>Prepare denial letter</u></p> <ul style="list-style-type: none"> • In the G drive, follow this path: BPPE/Licensing/Denial/DenialTemplate • Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution. • Forward letter to Licensing Manager. The Licensing Manager will review for accuracy and the forward to the Licensing Chief for signature. • When denial letter is returned with signature of Licensing Chief, forward the entire file to the Denial Liaison. <p><i>Note: For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC), BPPE approval or denial letter must be forwarded to Christine Jones at BBC by email (Christine.Jones@dca.ca.gov), and a cc to the Licensing Manager is required. You may forward an unsigned version of the approval letter; it is not necessary to scan the document with the licensing manager’s signature.</i></p>	<p>SSA/AGPA</p>

Bureau for Private Postsecondary Education Procedure

Title: Change of Name Application	Supersedes: March 7, 2013	Procedure #: 2013-0021
Policy Owner: Licensing Unit	Effective: Immediately	Page: 1 of 6
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Change of Name Application and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

Productivity Benchmark: Approximately 30 minutes of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
<u>Routine Verification Audits</u> 1. Current Valid Approval <ul style="list-style-type: none"> ○ In the “Schools’ General Information” screen, click on the “Approval” tab to check the school’s expiration date. An application for change of name will <u>not</u> be approved for an institution with an expired approval. ○ If institution’s approval to operate has expired, notify institution that an application for renewal must be submitted 	SSA/AGPA

<p>(if eligible, refer to “Renewal Notification Process section).</p> <ul style="list-style-type: none"> ▪ If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status. <p>If more than six months have passed since the institution’s approval to operate has expired, the institution must submit a new application (renewal is not an option). Call or forward written correspondence to inform school of the expired approval status</p>	
<p>2. Pending Complaints</p> <ul style="list-style-type: none"> ○ In the “Schools’ General Information” screen in SAIL, click on “Enforcement”. ○ Open and closed complaints will be displayed; if the “Date Closed” field is empty, the complaint is open. ○ If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. <i>“Are there any violations that Licensing should be aware of prior to granting an approval?”</i> 	SSA/AGPA
<p>3. Revenue Tracking</p> <ul style="list-style-type: none"> ○ Check for past due STRF assessments or Annual Fees <ul style="list-style-type: none"> ▪ In the “Schools’ Information” screen enter the school code and press “Go”. ▪ Click on “Revenue Tracking”. ▪ If annual fees or STRF assessments are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices. To print invoices click on the “Invoice #” field, next to the invoice that is outstanding. This will prompt the invoice to print. 	SSA/AGPA
<p>4. Pending Applications</p> <ul style="list-style-type: none"> ○ Check SAIL for other pending applications for the institution. <ul style="list-style-type: none"> ▪ In the “Schools’ General Information” screen, click on the “Applications” tab. ▪ Scroll down to determine if there are pending applications; check the “App Status” field. If applications are pending, this field will read “Receipt letter Sent” or “Pending”. 	SSA/AGPA

<ul style="list-style-type: none"> ▪ Pull pending application(s) and review if not already assigned to an analyst. 	
<p>5. Application Review</p> <ul style="list-style-type: none"> • The application must be an original, not a reproduction (sometimes schools reproduce the application, changing the formatting, etc.). • Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application. • The application must have original signature(s); photocopied signatures are not acceptable. • Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicated on the application. Use the "Change of Name" application review checklist to complete the application review. <p>If deficiency letter is needed:</p> <ul style="list-style-type: none"> • Verify the following when applicable <ul style="list-style-type: none"> ○ Using SAIL, perform an ownership check to determine if other institutions are owned by the proposed owner(s), and if so, if the institution is in good standing with the Bureau. If results are positive and there are identified problems with the institution(s) consult with licensing manager. <ul style="list-style-type: none"> ▪ In "Schools Information" click on "Other Searches" ▪ Click on the "Ownership Searches" field ▪ Type the owner's last name in the field titled "Owner Name Search Parameter", then click on "search" ▪ If the individual is owner of another institution, that information will be displayed. • If the application is incomplete, prepare a deficiency letter as follows: <ul style="list-style-type: none"> ○ In the G drive, follow this path: BPEE/Licensing/Non Accredited Approval/Change of Name/Change of Name Deficiency Letter ○ Using the template, modify as applicable to the 	<p>SSA/AGPA</p>

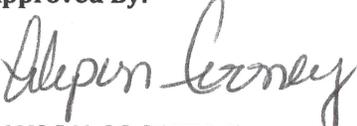
<p>institution's specific deficiencies. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter.</p> <ul style="list-style-type: none"> ○ Mail the deficiency letter with the original signature to the institution; maintain a copy with the application packet. <p>The institution is given one opportunity to correct identified deficiencies. If the application does not demonstrate compliance after the deficiency letter has been forwarded, consult with the licensing manager and discuss possibility of issuing a denial.</p>	
<p>6. Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> ● Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> ○ In the G drive, follow this path: BPPE/Licensing/New Accredited Approval/Add a Branch/Addition of a Separate Branch/Memo ● Update SAIL <ul style="list-style-type: none"> ○ Enter the "Application Number" in the application query section of SAIL. ○ Press add comment. ○ Type : Application forwarded to Manager for Approval or Denial and the date. ○ Submit complete package to Licensing Manager for review. ● After the application is returned by the Licensing Manager Go back into the comments and type: Returned from Manager and enter the date. ● If licensing manager determines additional information is required, prepare deficiency letter (refer to "Application Review" section). Update SAIL (refer to "Updating SAIL" section). 	SSA/AGPA
<p>7. Entering the Change of Name in SAIL (for approved applications)</p> <ul style="list-style-type: none"> ○ In the "Application Detail " screen, enter the application number click on "Go". ○ Click on the "Application Specific Information" tab. ○ Enter the proposed new name of the institution and click on "Save Work". ○ In the "Applications Processing" screen, enter the application number and click on "Go". ○ In the "Current Status" field, select "Approved" or "Denied" from the drop-down menu. 	SSA/AGPA

<ul style="list-style-type: none"> ○ Click on "Save Work". ○ "Status Modification" Box will appear; read and click "OK". ○ Click on "Save and Exit". 	
<p>8. Print Approved Programs and Locations</p> <ul style="list-style-type: none"> ○ In the SAIL "Schools' General Information" screen click on the "Report Center" tab ○ Look under the "Official Bureau Documents" section ○ Click on "Official Approved/Registered Programs List" box ○ Click "Print" <p>Using the method above, print the "Approved Branch/Satellite Location List" if applicable.</p>	SSA/AGPA
<p>9. Notification to Institution (perform ONE of the following)</p> <p>Prepare approval letter</p> <ul style="list-style-type: none"> ● In the G drive, follow this path: BPPE/Licensing/Non Accredited Approval/Change of Name /Change of Name Approval letter ● Using the template, change the information in the highlighted fields to reflect information specific to the institution. ● Forward to licensing manager for signature. ● Make a copy of the signed approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable). ● Mail letter with original signature and Approved/Registered Programs List to school's mailing address. ● Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school's file. ● Proceed to "Completed Application" section. <p>Prepare denial letter.</p> <ul style="list-style-type: none"> ● In the G drive, follow this path: BPPE/Licensing/Non Accredited Denial Letter Template ● Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution. ● Forward letter to Licensing Manager. The Licensing Manager will review for accuracy and the forward to the Licensing Chief for signature. ● When denial letter is returned with signature of Licensing Chief, forward the entire file to the Denial Liaison. <p><i>Note: For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC), BPPE approval or denial letter must be forwarded to Christine Jones at BBC by email (Christine.Jones@dca.ca.gov), and a cc to the Licensing Manager is required. You may forward an unsigned version of the approval letter; it is not necessary to scan the document with the licensing</i></p>	SSA/AGPA

<p><i>manager's signature.</i></p>	
<p>10. Updating the Applications Processing Database in SAIL</p> <ul style="list-style-type: none"> • In the "Applications Processing" screen, enter the application number and click on "Go". • In the "Current Status" field, select "Approved" or "Denied" from the drop-down menu. • Click on "Save Work". • "Status Modification" Box will appear; read and click "OK". <p>Click on "Save and Exit".</p>	<p>SSA/AGPA</p>
<p>11. Mail Approval Letter</p> <ul style="list-style-type: none"> • Make a copy of the approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable). • Mail letter with original signature and Approved/Registered Programs List to school's mailing address. <p>Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school's file.</p>	<p>SSA/AGPA</p>
<p>12. File Completed Application</p> <ul style="list-style-type: none"> • Place application in institution's permanent file. <ul style="list-style-type: none"> ○ Refer to "File Organization" section for instructions. 	<p>SSA/AGPA</p>



Bureau for Private Postsecondary Education Procedure

Title: Change Educational Objectives Application	Supersedes: March 7, 2013	Procedure #: 2013-0022
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 6
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Change Educational Objectives Application and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

Productivity Benchmark: Approximately 8 hours of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
1. Routine Verification Audits Current Valid Approval <ul style="list-style-type: none"> ○ In the “Schools’ General Information” screen, click on the “Approval” tab to check the school’s expiration date. An application for change in educational objectives will <u>not</u> be approved for an institution with an expired approval. 	AGPA/Ed Spec

- If institution's approval to operate has expired, notify institution that an application for renewal must be submitted (if eligible, refer to "Renewal Notification Process section").
 - If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status.
 - If more than six months have passed since the institution's approval to operate has expired, the institution must submit a new application (renewal is not an option). Call or forward written correspondence to inform school of the expired approval status.

Pending Complaints

- In the "Schools' General Information" screen in SAIL, click on "Enforcement"
- Open and closed complaints will be displayed; if the "Date Closed" field is empty, the complaint is open.
- If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. "Are there any violations that Licensing should be aware of prior to granting an approval?"

Revenue Tracking

- Check for past due STRF assessments or Annual Fees.
 - In the "Schools' General Information" screen click on "Revenue Tracking".
 - If any of the above noted fees are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices. To print invoices click on the "Invoice #" field next to the invoice that is outstanding. This will prompt the invoice to print.

Pending Applications

- Check SAIL for other pending applications for the institution.
 - In the 'School's General Information' screen, click on

<p>the "Applications" tab.</p> <ul style="list-style-type: none"> ▪ Scroll down to determine if there are pending applications; check the "App Status" field. If applications are pending, this field will read "Receipt letter sent" or "Pending". ▪ If a pending application is unassigned, pull the application and review concurrently. 	
<p>2. Application Review</p> <ul style="list-style-type: none"> • The application must be an original, not a reproduction (sometimes schools reproduce the application, changing the formatting, etc.). • Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application. • The application must have original signatures; photocopied signatures are not acceptable. • Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicated on the application. Use the "Significant Change in Method of Instructional Delivery" application review checklist to complete the application review. • If the application is incomplete, prepare a deficiency letter as follows: <ul style="list-style-type: none"> ○ In the G drive, follow this path: BPPE/Licensing/Non Accredited Approval/Change in Educational Objectives/Change of Educational Objectives-Deficiency Template ○ Using the template, modify as applicable to the institution's specific deficiencies. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter. ○ Mail the deficiency letter with the original signature to the institution; maintain a copy with the application packet. • The institution is given one opportunity to correct identified deficiencies. If the application does not demonstrate compliance after the deficiency letter has been forwarded, consult with the licensing manager and discuss possibility of issuing a denial. 	<p>AGPA/Ed Spec</p>
<p>3 Forward to Licensing Manager for Review</p> <ul style="list-style-type: none"> • Prepare memorandum to Licensing Manager with recommended action. 	<p>AGPA/Ed Spec</p>

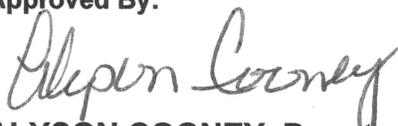
<ul style="list-style-type: none"> ○ In the G drive, follow this path: BPPE/Licensing/Non Accredited Approval/Add a Branch/Addition of Separate Branch Memo ● Update SAIL <ul style="list-style-type: none"> ○ Enter the "Application Number" in the application query section of SAIL. ○ Press add comment. ○ Type : Application forwarded to Manager for Approval or Denial and the date. ○ Submit complete package to Licensing Manager for review. ● After the application is returned by the Licensing Manager Go back into the comments and type: Returned from Manager and enter the date. ● If licensing manager determines additional information is required, prepare deficiency letter (refer to "Application Review" section). Update SAIL (refer to "Updating SAIL" section). 	
<p>4. Notification to Institution (perform one of the following)</p> <p>Prepare approval letter</p> <ul style="list-style-type: none"> ● In the G drive, follow this path: BPPE/Licensing/Non Accredited Approvals/Change in Educational Objectives / Approval Letter ● Using the template, change the information in the highlighted fields to reflect information specific to the institution. ● Forward to licensing manager for signature. ● After signed letter is returned by licensing manager, forward copy with original signature to institution and maintain a copy for the institution's file. <p>Prepare denial letter</p> <ul style="list-style-type: none"> ● In the G drive, follow this path: BPPE/Licensing/Denials/Denial Template ● Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution. ● Forward letter to Licensing Manager. The Licensing Manager will review for accuracy and the forward to the Licensing Chief for signature. ● When denial letter is returned with signature of Licensing Chief, forward the entire file to the Denial Liaison. <p><i>Note: For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC), BPPE approval or denial letter must be forwarded to Christine Jones at BBC by email (Christine.Jones@dca.ca.gov), and a cc to the Licensing Manager is required. You may forward an unsigned version of the approval letter; it is not necessary to scan the</i></p>	

<i>document with the licensing manager's signature.</i>	
<p>5. Entering the Change in Educational Objectives in SAIL (for approved applications)</p> <ul style="list-style-type: none"> ● In the "School's Information" screen, enter the school code and click on "Go". ● Click on the "Add a School Item" field. ● Click on "Add a Program". Enter the following: <ul style="list-style-type: none"> ○ Program name/course title ○ Date program approved ○ Application number ○ Program type – select from drop down box (degree, exempt or non-degree) ○ Click "Submit" ● A new screen will open; enter information into or place a check mark in the following fields: <ul style="list-style-type: none"> ○ "Residential/Traditional Setting" (this indicates instructional delivery takes place in a classroom) ○ "Distance Learning" – if institution has distance learning programs check the box in this field ○ "Length of instruction" – indicate program length in hours or credits/units ○ "Concurrent approval required by" – if concurrent approval is required by another agency, enter the agency's information in this field ○ "Description" – use the drop down box to choose the appropriate program type ○ Click "Save Work" ● Repeat process for each additional program 	AGPA/Ed Spec
<p>6. Print Approved Programs and Locations</p> <ul style="list-style-type: none"> ● In SAIL click on the "Report Center" tab <ul style="list-style-type: none"> ○ Look under the "Official Bureau Documents" section ○ Click on "Official Approved/Registered Programs List" box ○ Click "Print" ○ Using the method above, print the "Approved Branch/Satellite Location List" if applicable. 	AGPA/Ed Spec
<p>7. Updating the Applications Processing Database in SAIL</p> <ul style="list-style-type: none"> ● In the "Applications Processing" screen, enter the application number and click on "Go". ● In the "Current Status" field, select "Approved" or "Denied" from the drop-down menu. ● Click on "Save Work". ● "Status Modification" Box will appear; read and click 'OK'. 	AGPA/Ed Spec



Bureau for Private Postsecondary Education Procedure

<ul style="list-style-type: none">• Click on "Save and Exit".	
<p>8. File Completed Application</p> <ul style="list-style-type: none">• Place application in institution's permanent file<ul style="list-style-type: none">○ Refer to "File Organization" section for instructions	AGPA/Ed Spec

Title: Lead Licensing Analyst	Supersedes: None	Procedure #: 2013-0044
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1-2
Issue Date: June 3, 2013	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The Lead Licensing Analyst will provide mentoring and advice to other team members as well as participate in the development and implementation of the Licensing Unit “Boot Camp” Training Program.*

Purpose: *To ensure analytical procedures are being provided to all Licensing Analysts by training and mentoring new employees, peer review of completed staff work and providing management with positive suggestions for change and implementing best practices.*

Definitions:

Education Specialist – Bureau for Private Postsecondary Education staff assigned to review the proposed/approved educational programs of an institution.

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Subject Matter Expert – An individual acquired by the Bureau for Private Postsecondary Education to review the educational curriculum in a specific area of study.

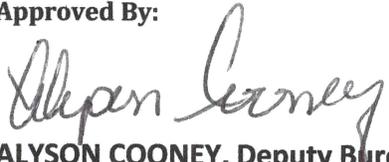
Procedures:

Task	
1. Day to day guidance of team members <ul style="list-style-type: none"> • Assist staff with complex analysis. • Provide guidance on problem solving. 	Lead AGPA
2. Participate in recruitment activities. <ul style="list-style-type: none"> • Assist with employment application screening. • Assist with the candidate interview process. 	Lead AGPA

<p>3. Ensure that processes and procedures involving application review are documented and kept up to date.</p> <ul style="list-style-type: none"> • Develop and maintain a significant understanding of all aspects of the applications and industry. 	<p>Lead AGPA</p>
<p>4. Make improvement suggestions for change to management.</p> <ul style="list-style-type: none"> • Identifying ways to streamline the processes within the Licensing Unit as well as the overlapping processes within other units of the Bureau. 	<p>Lead AGPA</p>
<p>5. Develop and implement Licensing Unit Application “Boot Camp” Training.</p> <ul style="list-style-type: none"> • Internal training to new employees. • External training for applicants and or consultants. 	<p>Lead AGPA</p>
<p>6. Provide additional one on one training/mentoring to new employees.</p>	<p>Lead AGPA</p>
<p>7. Peer review of completed applications.</p> <ul style="list-style-type: none"> • Ensure the application is organized per procedures. • Ensure the documentation and evidence is able to substantiate approval or denial. • Provide written finding to management. 	<p>Lead AGPA</p>



Bureau for Private Postsecondary Education Procedure

Title: Change in Method of Instructional Delivery for an Accredited Institution	Supersedes: July 3, 2013	Procedure #: 2013-0060
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 5
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review all applications in a timely and consistent manner adhering to the laws and codes related to a particular application from a Private Postsecondary institution.*

Purpose: *Describes the tasks associated with processing the Significant Change in Method of Instructional Delivery for an Accredited Institution and how that application should be handled and reviewed.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation

Productivity Benchmark: Approximately 1 hour of staff time to complete the initial review. Received response to deficiency letters shall be reviewed within 2 weeks to ensure that a compliant application is approved within 30 days as required by statute.

Procedures:

Task	Who is Responsible
1. Routine Verification Audits Current Valid Approval <ul style="list-style-type: none"> ○ In the “Schools’ General Information” screen, click on the “Approval” tab to check the school’s expiration date. An application for change in method of instructional delivery will 	SSA/AGPA

<p><u>not</u> be approved for an institution with an expired approval.</p> <ul style="list-style-type: none"> ○ If institution’s approval to operate has expired, notify institution that an application for renewal must be submitted (if eligible, refer to “Renewal Notification Process section”). <ul style="list-style-type: none"> ▪ If the approval to operate expired within six months of the approval expiration date, the school may submit a renewal application; call or forward written correspondence to inform school of the expired approval status. ▪ If more than six months have passed since the institution’s approval to operate has expired, the institution must submit a new application (renewal is not an option). Call or forward written correspondence to inform school of the expired approval status. 	
<p>2. Pending Complaints</p> <ul style="list-style-type: none"> ○ In the “Schools’ General Information” screen in SAIL, click on “Enforcement” ○ Open and closed complaints will be displayed; if the “Date Closed” field is empty, the complaint is open. ○ If the institution has open complaints, contact the assigned analyst in the Enforcement Unit by email to find out if the complaint is such that there is justification for the Licensing Unit to delay issuing an approval until the complaint is resolved. “Are there any violations that Licensing should be aware of prior to granting an approval?” 	SSA/AGPA
<p>3. Revenue Tracking</p> <ul style="list-style-type: none"> ○ Check for past due STRF assessments or Annual Fees. <ul style="list-style-type: none"> ▪ In the “School’s General Information” screen click on “Revenue Tracking”. <p>If any of the above noted fees are outstanding from 2010 to present, prepare written correspondence advising the institution of the outstanding fees and include copies of applicable invoices. To print invoices click on the “Invoice #” field next to the invoice that is outstanding. This will prompt the invoice to print.</p>	SSA/AGPA
<p>4. Pending Applications</p> <ul style="list-style-type: none"> ○ Check SAIL for other pending applications for the institution. <ul style="list-style-type: none"> ▪ In the ‘School’s General Information’ screen, click on the “Applications” tab. ▪ Scroll down to determine if there are pending 	SSA/AGPA

Bureau for Private Postsecondary Education Procedure

<p>applications; check the "App Status" field. If applications are pending, this field will read "Receipt letter sent" or "Pending".</p> <ul style="list-style-type: none"> ▪ If a pending application is unassigned, pull the application and review concurrently. 	
<p>5. Application Review</p> <ul style="list-style-type: none"> • The application must be an original, not a reproduction (sometimes schools reproduce the application, changing the formatting, etc.). • Confirm that the correct application fee has been submitted; the application fee is listed on the first page of the application. • The application must have original signatures; photocopied signatures are not acceptable. • Each section of the application must be filled out completely, and accompanied by the applicable attachments as indicted on the application. • The application must include a copy of the current (dated within the past 6 months) verification of accreditation granted by the accrediting agency; document must reflect the change in method of instructional delivery. • If the application is incomplete, prepare a deficiency letter as follows: <ul style="list-style-type: none"> ○ In the G drive, follow this path: BPPE (LICENSING)\Accredited Approvals\Change in Method\Deficiency-Change in Method.docx ○ Using the template, modify as applicable to the institution's specific deficiencies. Save a copy of the letter in your directory, using the "save as" feature, so as to maintain the integrity of the template letter. ○ Mail the deficiency letter with the original signature to the institution contact person and owner(s); maintain a copy with the application packet. • The institution is given one opportunity to correct identified deficiencies. If the application does not demonstrate compliance after the deficiency letter has been forwarded, consult with the licensing manager and discuss possibility of issuing a denial. 	SSA/AGPA
<p>6. Update SAIL/Forward to Licensing Manager for Approval</p> <ul style="list-style-type: none"> • Prepare memorandum to Licensing Manager with recommended action. <ul style="list-style-type: none"> • In the G drive, follow this path: \BPPE (LICENSING)\Accredited Approvals\Change in Method\Deficiency-Change in Method.docx 	

Approvals Change in Method (Memo) Change in Method of Delivery

• **Prepare approval letter**

- In the G drive, follow this path: BPPE/Licensing/Non Accredited Approval/Significant Change in Instructional Delivery/Significant Change in Instructional Delivery Approval Letters
- Using the template, change the information in the highlighted fields to reflect information specific to the institution.

Updating the Applications Processing Database in SAIL

- In the "Applications Processing" screen, enter the application number and click on "Go".
- In the "Current Status" field, select "Approved" or "Denied" from the drop-down menu.
- Click on "Save Work".
- "Status Modification" Box will appear; read and click 'OK'.
- Click on "Save and Exit".

Entering the Significant Change in Method of Instructional Delivery in SAIL (for approved applications)

- In the "School's Information" screen, enter the school code and click on "Go".
- Click on the "Programs" tab.
- Click on the right hand corner in the "Program Title" box.
 - Click on the "Residential/Traditional Setting box or the Distance Learning box to indicate the applicable type of instruction now offered by the institution.
 - Click on "Save Work".

Print Approved Programs and Locations

- In SAIL click on the "Report Center" tab.
 - Look under the "Official Bureau Documents" section.
 - Click on "Official Approved/Registered Programs List" box
 - Click "Print".

Using the method above, print the "Approved Branch/Satellite Location List" if applicable.

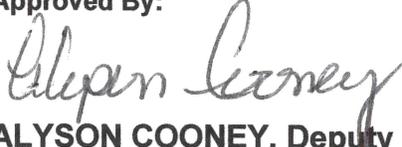
Update SAIL

- Enter the "Application Number" in the application query section of SAIL.
- Press add comment.
- Type: Application forwarded to Manager for Approval or Denial and

<p>the date.</p> <ul style="list-style-type: none"> • Submit complete package to Licensing Manager for review. • After the application is returned by the Licensing Manager Go back into the comments and type: Returned from Manager and enter the date. • If licensing manager determines additional information is required, prepare deficiency letter (refer to "Application Review" section). Update SAIL (refer to "Updating SAIL" section). 	
<p>7. Notification to Institution (perform one of the following)</p> <p><u>Mail Approval Letter</u></p> <ul style="list-style-type: none"> • Make a copy of the approval letter and the Approved/Registered Programs List (and the Approved Branch/Satellite Location List if applicable). • Mail letter with original signature and Approved/Registered Programs List to school's mailing address. <p>Place a photocopy of the approval letter and a copy of the Approved/Registered Programs List in the school's file.</p> <p><u>Prepare denial letter</u></p> <ul style="list-style-type: none"> • In the G drive, follow this path: BPE/Licensing/Denials/Denial Template <p>Using the template, modify the denial letter according to the deficiencies or denial reason specific to the institution.</p> <ul style="list-style-type: none"> • Forward letter to Licensing Manager. The Licensing Manager will review for accuracy and the forward to the Licensing Chief for signature. • When denial letter is returned with signature of Licensing Chief, forward the entire file to the Denial Liaison. <p><i>Note: For institutions with concurrent approval from the Bureau of Barbering and Cosmetology (BBC), BPPE approval or denial letter must be forwarded to Christine Jones at BBC by email (Christine.Jones@dca.ca.gov), and a cc to the Licensing Manager is required. You may forward an unsigned version of the approval letter; it is not necessary to scan the document with the licensing manager's signature.</i></p>	
<p><u>8. File Completed Application</u></p> <ul style="list-style-type: none"> • Place application in institution's permanent file <p>Refer to "File Organization" section for instructions</p>	



Bureau for Private Postsecondary Education Procedure

Title: Denial Process	Supersedes: July 3, 2013	Procedure #: 2013-0061
Procedure Owner: Licensing Unit	Effective: Immediately	Page: 1 of 4
Issue Date: September 10, 2015	Approved By:  ALYSON COONEY, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *Denial process for applications in Licensing Unit.*

Purpose: *To ensure educational programs being provided by an institution meet the minimum requirements of the California Private Postsecondary Education Act of 2009 and the California Code of Regulations.*

Definitions:

Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education.

Guide on Deficiency Letters and Denial Letters – A guide to identify where deficiency and denial letters are located, types and reasons for denials, application organization and supporting documentation.

*Reasons for Denial – Incomplete Application 5CCR 71400.5
Capacity to meet minimum operating standards CEC 94887*

Procedures:

Task	Who is Responsible
<ul style="list-style-type: none"> ○ Application Organization ○ Organize the initial application with supporting documents in the order of the sections in the application. ○ Responses to the deficiency letter(s) shall be attached to the deficiency letter(s). (Do not incorporate into the initial applications.) ○ All areas of deficiency shall be tagged with the post-it flags. ○ Prepare Denial Memo to forward on to Manager. 	SSA/AGPA

<p>1. Application to Management for Recommendation of Denial</p> <ul style="list-style-type: none"> ○ Manager agrees/disagrees with recommendation and returns to Analyst. <ul style="list-style-type: none"> ○ If Manager disagrees with recommendation, prepare new deficiency letter. ○ If Manager agrees, prepare denial letter. Denial templates can be found in the G drive: G:\BPPE\LICENSING\Denials\Denial Templates (March 2012) 	<p>SSA/AGPA/SSM</p>
<ul style="list-style-type: none"> ● Application for Denial <ul style="list-style-type: none"> ○ After a Denial Memo has been signed off by your manager, and the denial letter has been created, save a copy of the denial letter within a new folder at the following location: G:\BPPE\LICENSING\Denials\Completed Denial Letters\Denials Pending Appeal ○ Submit denial letter to Manager for review. ● Applications for Denial with Non Accredited Degree Programs <ul style="list-style-type: none"> ○ Licensing Analyst will complete a Draft Denial Letter and place on top of application. ○ Application will be forwarded to an Education Specialist. ○ The Education Specialist will complete a review of the educational programs and add the deficiencies to the Denial Letter drafted by the Licensing Analyst. ○ The application will then be returned to the Licensing Unit for final Licensing Chief signature. 	<p>SSA/AGPA/ED Spec/SSM</p>
<p>2. Licensing Chief signs denial letter and forwards to the denial liaison.</p>	<p>SSM II</p>
<p>3. Denial Liaison prepares application denial file.</p> <ul style="list-style-type: none"> ● Attach certified mail cards and receipts to application. ● Request labels from OT: <ul style="list-style-type: none"> ○ Owner(s) of record (x4) ○ Application contact person (x4) ○ Agent for Service of Process (x4) 	<p>Denial Liaison</p>
<p>4. Update SAIL:</p> <ul style="list-style-type: none"> ● For all applications: In the "Application Detail" screen, change application "Current Status" to "Denied". Click "Status Date" box so "Modification Verification" box pops up and click "Yes". "Reason for Modification" box pops up: enter application number and "application denied". Click "Save and Exit". 	<p>Denial Liaison</p>
<p>5. Mail letters to the following:</p> <ul style="list-style-type: none"> ● Owner(s) of record-1 certified, 1 regular ● Application contact person-1 certified, 1 regular ● Agent for Service of Process-1 certified, 1 regular 	<p>Denial Liaison</p>

<ul style="list-style-type: none"> ○ If the application is for institutional approval or renewal, include a copy of "Institutional Closure Procedures" that can be found in the G drive: <u>G:\BPPE\LICENSING\Denial\Denial Templates (March 2012)\Institution Closure Procedures.docx</u> 	
<p>6. Distribute letters to the following in-house:</p> <ul style="list-style-type: none"> ● Copy for Licensing File ● Formal Discipline Analyst ● Closed School Unit Analyst (if applicable) ● Licensing Denial Log Book 	Denial Liaison
<p>7. Track denials</p> <ul style="list-style-type: none"> ● Track the denials in the denial log for the 60 day appeal process found in the G drive: <u>G:\BPPE\LICENSING\Denial\Copy of Application Denial Log.xls</u> ● No Appeal <ul style="list-style-type: none"> ○ Update log. ○ Move institutions denial folder from Denial Pending Folder to the Denials Upheld Folder. ○ Update SAIL: <ul style="list-style-type: none"> ● If the application is for an institutional approval or renewal: In the "Schools' information" screen, update School Status to "Expired Approval". Click in a blank box so "Modification Verification" box pops up and click "Yes". A "Reason for Modification" box pops up: enter application number and "application denied". Click "Save Work!" and back out by clicking "Back to Main". ○ File in file room. ● Appeal <ul style="list-style-type: none"> ○ Formal Discipline Analyst notifies Licensing Denial Liaison of appeal and requests licensing file. ○ Liaison tracks in Denial Log date of appeal and date file submitted to enforcement. ○ Liaison moves institutions denial folder from Denial Pending Folder to "Denials Appealed" folder found in the G drive: <u>G:\BPPE\LICENSING\Denial\Completed Denial</u> 	Denial Liaison Denial Liaison/Formal Discipline Analyst
<p>8. Re-Review(s)</p> <ul style="list-style-type: none"> ● Analyst reviews newly submitted documents. If application is deficient, submit updated denial to management. 	SSA/AGPA
<p>9. Denial Overturned</p>	SSA/AGPA/

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<ul style="list-style-type: none">• Discipline Unit withdraws administrative hearing and forwards file to Denial Liaison.• Denial Liaison updates tracking log and moves institutions denial folder from Denial Pending Folder to Denials Overturned Folder. Forward file to assigned Licensing Analyst.• Licensing Analyst completes approval process.	Formal Discipline Analyst
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**QUALITY OF
EDUCATION
UNIT
PROCEDURES**

Title: Selecting a Licensing Analyst for the Onsite Review	Supersedes: None	Procedure #: 2013-0024
Procedure Owner: Quality of Education Unit	Effective: February 10, 2014 (Rev.)	Page: 1 of 2
Issue Date: May 3, 2013	Approved By: JOANNE WENZEL, Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Licensing Analyst assigned to the original application should accompany the Education Specialist and visiting committee members on the site-visit.

Purpose: As the first initial reviewer of the application, the Licensing Analyst will be able to provide support to the Education Specialist. The analyst will have the most knowledge of the application.

Productivity Benchmark: Approximately .5 of an hour of staff time.

Procedures:

Task	Who is Responsible
1. Selection of the Licensing Analyst: <ul style="list-style-type: none"> a. The selected Licensing Analyst should be the initial reviewer of the application. If the initial reviewer is not available, the Licensing Manager may provide another Licensing Analyst to assist with the site visit. b. Contact the Licensing Manager to obtain approval for the Licensing Analyst to attend. c. Once the Licensing Analyst is identified, notify the Licensing Analyst of the possible site visit dates. 	Education Specialist
2. The Licensing Analyst may review, but is not limited to, the following: <ul style="list-style-type: none"> a. Enrollment Agreement <ul style="list-style-type: none"> i. The Licensing Analyst will use the Enrollment Agreement Checklist from the Licensing Unit to verify for compliance. Attachment G. 	Licensing Analyst

<p>b. Catalog</p> <p>II. The Licensing Analyst will use the Catalog Checklist from the Licensing Unit to verify for compliance. Attachment H.</p> <p>c. Student Record:</p> <p>I. Review the institution’s recordkeeping policy and procedures. Determine if the policy and procedures are in compliance with BPPE regulation, and determine if the institution is following their own policy and procedures by reviewing student records.</p> <p>II. Review student records for the following:</p> <p>A. Use attachment I as a guide.</p> <p>d. Student Survey:</p> <p>I. The Licensing Analyst will use the provided attachment J to utilize as a student survey.</p>	
<p>3. The Licensing Analyst may be assigned to other tasks as necessary for a successful site visit.</p>	<p>Education Specialist</p>
<p>4. Upon completion of the site visit, the Licensing Analyst will be required to provide a written report to the Education Specialist.</p>	<p>Licensing Analyst</p>

Title: Entrance and Exit Interview	Supersedes: None	Procedure #: 2013-0025
Procedure Owner: Quality of Education Unit	Effective: February 10, 2014 (rev.)	Page: 1 of 2
Issue Date: May 3, 2013	Approved By: JOANNE WENZEL, Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Lead Education Specialist will provide an Entrance and Exit Interview to announce the beginning and ending of the Visiting Committee’s onsite review.

Purpose: The entrance interview will allow for introductions between the visiting committee and institution members. The exit interview will allow for the institution to ask questions and know what to expect after the onsite review.

Definitions:

- Visiting Committee - Director appointed members that may consist of educators or instructors trained in the subject matter of educational programs offered by the institution, and any other person with expertise in the standards listed in Section 94885 of the California Education Code.
- Institution Members – Members listed in the institution’s organization chart that may consist of the Chief Executive Officer, Chief Academic Officer, Chief Operating Officer, Management, Faculty, etc.

Productivity Benchmark: About 2 to 3 hours of staff time.

Procedures:

Task	Who is Responsible
1. Entrance Interview: <ol style="list-style-type: none"> Allow introduction of the Visiting Committee members to the institution. To establish an institution member(s), as point of contact, that the Lead Education Specialist may rely on to obtain documents or information. To answer any questions the institution may have regarding the onsite review. 	Lead Education Specialist

2. Exit Interview:

- a. Thank the institution for their time for the onsite review.
- b. Do not go into specifics regarding the onsite review.
- c. Do not address how the institution performed on the onsite review.
- d. Inform the institution that the visiting committee report will be provided to the institution in about 45 days. After receiving the visiting committee report, the institution will have 15 days to respond to the Bureau as to any errors of fact or erroneous findings based on errors of fact.

Lead Education Specialist



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Title: Onsite Review Packet	Supersedes: None	Procedure #: 2013-0026
Procedure Owner: Quality of Education Unit	Effective: February 10, 2014 (Rev.)	Page: 1 of 2
Issue Date: May 3, 2013	Approved By: JOANNE WENZEL, Bureau Chief Bureau for Private Postsecondary Education	

Policy: Prior to arriving at an institution for an onsite review, an institution must be notified a minimum of 30 days in advance of the visiting committee's arrival.

Purpose: Per Title 5 of the California Code of Regulation § 71450 and 71455, an institution must be notified and allowed an opportunity to challenge any member of the visiting committee. The Onsite Review Packet is provided in advance to give them the opportunity to challenge a member per the requirement.

Productivity Benchmark: Preparation of an Onsite Review Packet takes about 1 hour of staff time.

Procedures:

Task	Who is Responsible
1. The Lead Education Specialist will provide to the institution an Onsite Review Packet. The packet will consist of the following: <ol style="list-style-type: none"> a. 30 Day Notice Letter to School. Attachment C. b. Visiting Committee Review Checklist. Attachment D. c. Onsite Review Handbook. Attachment E. d. Curriculum Vitae of all Subject Matter Experts. Bureau staff does not need to provide Curriculum Vitae. <ol style="list-style-type: none"> i. The Curriculum Vitae will be obtained from the Subject Matter Experts. 	Lead Education Specialist
2. Challenge a member(s) of the Visiting Committee: <ol style="list-style-type: none"> a. If an institution objects to a member or members of the visiting committee, the institution may file a written objection with the Director at least 14 days 	Institution



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before the visiting committee's scheduled onsite review.	
3. Review Challenge and Respond to Institution If needed, refer to Title 5, CCR § 71455 for further guidance.	Lead Education Specialist
4. Submit Challenge to Director with suggested Response.	Lead Education Specialist
5. Review challenge and suggested Replacement.	Director
6. Receive response from Director and notify the Institution of the outcome.	Lead Education specialist



Bureau for Private Postsecondary Education Policy

Title: Selecting Subject Matter Experts (SME)	Supersedes: None	Procedure #: 2013-0027
Procedure Owner: Quality of Education Unit	Effective: February 10, 2014 (Rev)	Page: 1 of 3
Issue Date: May 3, 2013	Approved By: JOANNE WENZEL, Bureau Chief Bureau for Private Postsecondary Education (BPPE)	

Policy: The Bureau for Private Postsecondary Education “Bureau” will utilize Subject Matter Experts to review curriculum when more expertise is needed, in such fields as Psychology, Engineering, Business, Language, etc.

Purpose: To assist the Bureau in curriculum evaluation of educational programs being offered by the institution that requires specific subject matter expertise.

Definitions:

- Subject Matter Expert – An individual with expertise in a specific field of study such as Psychology, Engineering, Business, Language, etc.

Productivity Benchmark: Because of the difficulty in recruiting volunteers in the subject matter areas needed in can take as much as 10 hours of staff time to accomplish this function. The elapsed time can be extended several months due to lack of response or lack of interest.

Procedures:

Task	Who is Responsible
1. Use the following as a guide to determine the number of SMEs needed: <ul style="list-style-type: none"> • Identify the level (Bachelor, Master, Doctorate, Doctor of Philosophy) and type of programs (Business, Engineering, Psychology, etc.) offered by the institution. The SME must possess a degree equivalent to or greater than the level of the program reviewed. 	Lead Education Specialist

<ul style="list-style-type: none"> • If the institution is offering only one program (Business) then only one SME in Business is needed. If an institution is offering two programs (Business and Psychology) then two SMEs, Business and Psychology, will be needed. • The SME's level of education should be equivalent or higher than the level of the program being offered. For example, if an institution is proposing to offer a Doctor of Business Administration, the SME will possess a Doctorate in Business. • If a Ph.D. is offered in a specific field, the Education Specialist will acquire an SME in that area of study. If none is available in the field the institution plans to offer, an SME will be acquired that is an expert in a similar area of study. 	
<p>2. SMEs will be acquired from public institutions or private postsecondary education institutions (accredited or non-accredited).</p> <ul style="list-style-type: none"> • SMEs should be acquired from the same local vicinity as the site visit location. If unsuccessful, acquiring SMEs from different locals may be necessary. • Inform the SMEs that this is a non-compensated assignment; however, the state will reimburse for travel and lodging within State of California travel guidelines. • Once an SME has been identified, provide the SME's information to the Administrative Analyst (Jennifer Juarez) so she may begin the contract. • Once the contract has been approved, the SME will be added to the Bureau's list of contracted SMEs. 	<p>Lead Education Specialist</p>
<p>3. Expected Role of SMEs, may include but is not limited to the following:</p> <ul style="list-style-type: none"> • Evaluate faculty members to determine if they meet the minimum requirements. • Review the curriculum for programs being offered by the institution. • Review the syllabi to ensure it meets the minimum requirements. • Review student files to ensure the following: 	<p>Subject Matter Expert</p>

<ul style="list-style-type: none"> ➤ Did the student meet the admission requirements? ➤ If “Experiential Credits” were awarded, do they meet the requirements? ➤ If “Challenge Credits” were awarded, do they meet the requirements? Is there any value added? ➤ SMEs may be required to evaluate the facility. ➤ SMEs may be required to evaluate the equipment for delivery of the educational program. ➤ SMEs may be required to attend classes to evaluate the courses being offered. • SMEs may be required to interview faculty members on the following: <ul style="list-style-type: none"> ➤ Curriculum Development ➤ Syllabi Outline ➤ Other areas that may be required. ➤ SMEs may be required to review student work products i.e. projects, thesis, dissertations, etc. 	
<p>4. Write a report on their evaluation of the curriculum. The report is due 10 days from the completion of the site visit. The report will be submitted to the Lead Education Specialist.</p>	<p>Subject Matter Expert</p>
<p>5. Review the Visiting Committee Onsite Review report and comment or submit agreement</p>	<p>Lead Education Specialist Subject Matter Expert</p>



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Title: Onsite Review Report	Supersedes: None	Procedure #: 2013-0028
Procedure Owner: Quality of Education Unit	Effective: February 10, 2014 (Rev.)	Page: 1 of 2
Issue Date: May 3, 2013	Approved By: JOANNE WENZEL, Bureau Chief Bureau for Private Postsecondary Education	

Policy: Upon completion of the onsite review, the Lead Education Specialist will provide a written report to the Bureau of the onsite review facts and findings.

Purpose: To meet regulation as required by Title 5, California Code of Regulation § 71465.

Productivity Benchmark: This task can take approximately 8 hours to complete.

Procedures:

Task	Who is Responsible
1. Compiling Information for the Report: <ol style="list-style-type: none"> a. The information for the onsite review report will be derived from each visiting committee member from their assigned areas. b. The visiting committee member will provide to the Lead Education Specialist his/her facts and findings in regards to her assignment. c. The Lead Education Specialist will include and compile each member's facts and findings into the onsite review report. 	Lead Education Specialist
2. The contents of the onsite review report shall address the following: <ol style="list-style-type: none"> a. The visiting committee's findings regarding the institution's compliance with the statute and regulation, and facts supporting those findings; b. The visiting committee's assessment of the institution's ability to meet the stated objectives of each educational program offered by the institution, including deficiencies, and facts 	Lead Education Specialist

<p>supporting the assessment;</p> <p>c. The visiting committee’s assessment of the institution’s ability, as a whole, to implement its mission, and facts supporting the assessment; and</p> <p>d. The visiting committee’s recommendations for action on the application.</p>	
<p>3. Onsite Review Report (Draft):</p> <p>a. Upon completion of the report, the Lead Education Specialist will provide all visiting committee members a draft of the final report.</p> <p>b. The report must be approved by all visiting committee members in regards to the facts and findings.</p> <p>i. If a visiting committee member should challenge any facts or findings, the committee member must provide support to the Lead Education Specialist. If the challenge is upheld, the Lead Education Specialist will revise the report and resend it to all visiting committee members for review.</p>	<p>Lead Education Specialist</p>
<p>4. Visiting Committee Members Review of Report:</p> <p>a. The report must be approved by all visiting committee members in regards to the facts and findings.</p> <p>i. If a visiting committee member should challenge any facts or findings, the committee member must provide support to the Lead Education Specialist. If the challenge is upheld, the Lead Education Specialist will revise the report and resend it to all visiting committee members for review.</p>	
<p>5. Onsite Review Report (Final):</p> <p>a. Once the report has been agreed upon by the visiting committee members, the report will be presented to the Bureau.</p> <p>b. The Licensing Manager will provide the report to the institution.</p> <p>c. The institution will have fifteen (15) days to respond to the Bureau in regards to errors of fact or erroneous findings based on errors of fact.</p>	<p>Lead Education Specialist Licensing Manager</p>



Bureau for Private Postsecondary Education Policy

Title: Team Orientation Meeting	Supersedes: None	Procedure #: 2013-0029
Procedure Owner: Quality of Education Unit	Effective: Revised Feb. 6, 2014	Page: 1 of 3
Issue Date: May 3, 2013	Approved By: Joanne Wenzel, Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Lead Education Specialist will hold a team orientation meeting prior to going onsite.

Purpose: To provide for an introduction of the visiting committee members, brief the visiting committee members on their expectations, roles, and responsibilities for the onsite review.

Definitions:

- Statute – California Private Postsecondary Education Act of 2009
- Regulation – Title 5, California Code of Regulation

Productivity Benchmark: Typically the meeting will take approximately 1 to 2 staff hours to conduct.

Procedures:

Task	Who is Responsible
1. Location Selection: <ol style="list-style-type: none"> The team orientation meeting should be held the morning before going onsite. May occur at any location that is suitable for a hearing. An ideal location is the hotel lobby or breakfast area. If a member is unable to attend this meeting, attempt a phone, face time, or other suitable method the night prior to the onsite review. 	Lead Education Specialist
2. Introduction: <ol style="list-style-type: none"> Allow each member of the visiting committee to introduce themselves. If a visiting committee member is unable to attend, speak briefly on the missing committee members 	Lead Education Specialist

behalf.	
<p>3. Review the task at hand:</p> <ul style="list-style-type: none"> a. What is the purpose of the onsite review? b. What should the visiting committee hope to accomplish? c. What is expected from committee members? 	Lead Education Specialist
<p>4. Review assignments:</p> <ul style="list-style-type: none"> a. Licensing Analyst b. Subject Matter Experts c. Any other member assignments d. After assignment review, open the floor to questions or concerns. 	Lead Education Specialist
<p>5. Inform the visiting committee members of what they may or may not see:</p> <ul style="list-style-type: none"> a. If the institution is offering distance education, the institution will provide a distance education platform overview. b. The institution should provide an overview of library resources, especially if it is online. c. The institution may or may not have all items previously requested available to the visiting committee. d. If an area is seriously deficient and the institution is unable to provide the documents as requested, then assist in other areas that may be needed. e. If curriculum/syllabi are unavailable for the programs, do the best that you can with what you have and note the areas that are deficient in accordance with the statute and regulation. 	Lead Education Specialist
<p>6. Expectations for the report:</p> <ul style="list-style-type: none"> a. The report is due three (3) days from the completion of the onsite review. b. The report states the facts and findings. c. If the institution was unable to provide documents relating to a certain area then note it and move on. d. Use the statute and regulation to strengthen the report. 	Visiting Committee Members
<p>7. Travel Overview:</p> <ul style="list-style-type: none"> a. Explain how to file a travel claim: <ul style="list-style-type: none"> i. Provide Subject Matter Experts with the Expert Consultant Itemized Invoice. Attachment K. ii. Explain the reimbursement limitations. 	Lead Education Specialist



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<p>Make sure most updated reimbursement information is provided. It may be found at http://www.calhr.ca.gov/employees/Pages/travel.html. Attachment L.</p> <p>iii. Provide a point of contact (usually the Lead Education Specialist) if there are any questions related to travel.</p>	
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Title: Briefing Packets for Team Orientation	Supersedes: None	Procedure#: 2013-0030
Procedure Owner: Quality of Education Unit	Effective: Immediately	Page: 1 of 1
Issue Date: May 3, 2013	Approved By: LAURA METUNE, Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Lead Education Specialist will provide a briefing packet to all visiting committee members attending the onsite review. The packet should be provided before the team orientation.

Purpose: To allow visiting committee members time to review the briefing packet and familiarize themselves with the institution, regulation, and visiting committee member assignments.

Procedures:

Task	Who is Responsible
1. Provide each member of the visiting committee a Briefing Packet. The contents of the packet, at a minimum, shall include the following: <ol style="list-style-type: none"> a. Introduction and History b. BPPE Visiting Committee Handbook c. BPPE Visiting Committee Handbook Attachment d. Visiting Committee Organization Chart e. Visiting Committee Review Checklist f. Visiting Committee Member Assignments g. Quick Guide to Assignments h. Subject Matter Expert Curriculum Review i. Faculty Interview Guide j. Instructor Evaluation k. Student Survey <p><i>An example may be found on the network drive, please ask an Education Specialist who has had the opportunity to coordinate an onsite review.</i></p>	Lead Education Specialist



Bureau for Private Postsecondary Education Policy

Title: Onsite Review for Initial Approval and Re-approval of an Institution	Supersedes: None	Procedure #: 2013-0031
Procedure Owner: Quality of Education Unit	Effective: Immediately	Page: 1 of 4
Issue Date: May 3, 2013	Approved By: LAURA METUNE, Bureau Chief Bureau for Private Postsecondary Education	

Policy: Degree and Non-Degree granting institutions may be subject to an onsite review during the initial approval or re-approval process.

Purpose: To ensure educational programs being provided by an institution meet the minimum requirements as required by the California Private Postsecondary Education Act of 2009 and the Title 5 of the California Code of Regulations.

Definitions:

- Director – The Director of the Department of Consumer Affairs.
- Education Specialist – Journey-level Bureau for Private Postsecondary Education staff assigned to review the proposed/approved education programs of an institution.
- Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education to operate in the State of California.
- Licensing Manager – A manager within the Bureau for Private Postsecondary Education who oversees the Licensing Unit.
- Regulation – Title 5 of the California Code of Regulation
- Statute – California Private Postsecondary Education Act of 2009
- Subject Matter Expert – A volunteer with specific expertise acquired by the Bureau for Private Postsecondary Education to review educational curriculum in a specific area of study.

Procedures:

Task	Who is Responsible
<ol style="list-style-type: none"> 1. Recommendation for Onsite Review: <ol style="list-style-type: none"> a. Upon an Education Specialist’s review, if the need for an onsite review may be needed, the Education Specialist will make a recommendation, by Memorandum, to the Deputy Bureau Chief. b. Once the recommendation is approved by the Deputy Bureau Chief, then the Education Specialist will move forward with the elements required for an onsite review process. c. The Education Specialist making the recommendation will be the Lead for the onsite review. 	<p>Lead Education Specialist</p>
<ol style="list-style-type: none"> 2. Selecting the Visiting Committee Members: <ol style="list-style-type: none"> a. The Education Specialist making the recommendation will be the Lead for the onsite review and will be considered as a visiting committee member. b. The Lead Education Specialist will request from the Licensing Manager a Licensing Analyst to be a visiting committee member. <ol style="list-style-type: none"> i. Refer to Quality of Education Unit Procedure # 0024 for more information in selecting a Licensing Analyst. c. The Lead Education Specialist will assemble a team of Subject Matter Experts for the onsite review. <ol style="list-style-type: none"> i. Refer to the Quality of Education Unit Procedure #0027 for more information in selecting Subject Matter Experts. 	<p>Lead Education Specialist</p>
<ol style="list-style-type: none"> 3. Seeking Approval from the Director: <ol style="list-style-type: none"> a. Once the Lead Education Specialist has identified the visiting committee members, the Director must appoint the visiting committee members to the onsite review. b. Complete the “Memorandum From Education Specialist to Bureau Chief”. Attachment A. c. Complete the “Memorandum From Bureau Chief to Education Specialist”. Attachment B. d. Once the visiting committee has been approved by 	<p>Lead Education Specialist</p>

<p>the Director, move forward with notifying the institution.</p>	
<p>4. Notify the Institution of an Onsite Review:</p> <ul style="list-style-type: none"> a. Notify the institution (speak to someone with authority to make decisions on behalf of the institution) that the Bureau has been authorized to conduct an onsite review by the Director to ensure compliance with the statute and regulation. b. Arrange for a list of possible onsite review dates with the institution. The dates will need to be reviewed with all visiting committee members for availability. c. Once the final date is determined, move on to providing the institution an Onsite Review Packet. 	<p>Lead Education Specialist</p>
<p>5. Onsite Review Packet:</p> <ul style="list-style-type: none"> a. The institution must be provided an Onsite Review Packet at least 30 days in advance of an onsite review. The Onsite Review Packet will consist of the following: <ul style="list-style-type: none"> i. 30 Day Notice Letter to School. Attachment C. ii. Visiting Committee Review Checklist. Attachment D. iii. BPPE Visiting Committee Handbook. Attachment E. 	<p>Lead Education Specialist</p>
<p>6. Travel Accommodations:</p> <ul style="list-style-type: none"> a. The Lead Education Specialist will arrange for hotel, car rental (if necessary), flight (if necessary), and any other needs for all visiting committee members. It is ideal for all members to stay at one designated hotel, but flexibility is allowed. b. The Lead Education Specialist will be able to book air travel through the South West Airlines Business Account for Subject Matter Experts. 	<p>Lead Education Specialist</p>
<p>7. Visiting Committee Assignments:</p> <ul style="list-style-type: none"> a. The Lead Education Specialist must make a list of assignments for all team members to ensure a successful onsite review. Refer to attachment F for an example. b. Adjustment to assignments may be necessary. 	<p>Lead Education Specialist</p>
<p>8. Visiting Committee Team Orientation:</p> <ul style="list-style-type: none"> a. The Lead Education Specialist will hold a visiting committee team orientation the morning of the 	<p>Lead Education Specialist</p>

<p>onsite review. Refer to Team Orientation, Procedure # 0029 for further information.</p>	
<p>9. During the Onsite Review:</p> <ul style="list-style-type: none"> a. The visiting committee will provide an entrance and exit interview at the institution. Refer to Entrance and Exit Interview, Procedure # 0025 for further information. b. The Lead Education Specialist will act as the gatekeeper between the institution and visiting committee members. Flexibility is allowed. 	<p>Lead Education Specialist</p>
<p>10. After the Onsite Review:</p> <ul style="list-style-type: none"> a. All visiting committee member reports must be turned in to the Lead Education Specialist within three (3) days of the completion of the onsite review. b. The Lead Education Specialist will compile all visiting committee member reports and draft a final report that will be presented to all visiting committee members for review; the elapse time should be no longer than 30 days. There will be a five (5) day turnaround time for any comments or challenges to the report. c. Once approved by all visiting committee members, the visiting committee report will be presented to the Bureau. 	<p>Lead Education Specialist</p>
<p>11. Visiting Committee Report:</p> <ul style="list-style-type: none"> a. Once the visiting committee report is approved by the Bureau, the Licensing Manager will mail a copy of the report to the institution. b. The institution will have 15 days to respond to the report. 	<p>Licensing Manager</p>

Title: ATB Alternative Examination Approval Process	Supersedes: None	Procedure #: 2013-0058
Procedure Owner: Quality of Education Unit	Effective: Immediately	Page: 1 of 5
Issue Date: July 11, 2013	Approved By: Joanne Wenzel, Acting Bureau Chief Bureau for Private Postsecondary Education (BPPE)	

Policy: The Bureau for Private Postsecondary Education “Bureau” will approve an alternative Ability-To-Benefit (ATB) examination relative to the intended educational/occupational program provided by the institution, when the United States Department of Education does not have a relevant examination. The proposed examination shall not be approved unless the examination demonstrates reliability and validity.

Purpose: To assist the Education Specialist in the evaluation of an alternative ATB examination proposed by an institution.

Definitions:

- ATB alternative examination – An alternative examination for an ability-to-benefit (ATB) student as a student who does not have a high school diploma or its equivalent.
- The Ability-To-Benefit (ATB) Test -The ATB test is used for students lacking a high school diploma or its equivalent who wish to apply for admission to a Postsecondary educational/occupational institution.
- Institution – A private postsecondary education school seeking approval/re-approval from the Bureau for Private Postsecondary Education to operate in the State of California.
- Education Specialist – Journey-level Bureau for Private Postsecondary Education staff assigned to review the proposed ATB alternative examination.
- USDE-approved ATB tests – List of Ability-To-Benefit (ATB) tests and passing scores approved by the United State Department of Education.
- Secondary Education - Education beyond the elementary grades; provided by a high school.

- Competency - A competency is a set of defined skills, knowledge and abilities that are observable, measurable and critical to successfulness of individual student.
- Validity – Validity refers to the degree in which an examination is truly measuring what we intended it to measure.
- Reliability – Reliability is the degree to which an examination produces stable and consistent results.

Procedures:

Task	Who is Responsible
1. Steps to establish the necessity of an alternative ATB examination. <ul style="list-style-type: none"> • Evaluate and analyze the institution’s submitted justification for not utilizing one of the existing USDE-approved ATB examinations. • Identify the programs that the institution is seeking and proposing an alternate ATB examination for? • Identify the skills necessary for successful completion of the above programs. • Evaluate all the USDE-approved ATB examinations. Ascertain the purpose of each examination for specific skills, knowledge and abilities. • Compare and analyze the proposed examination with all the USDE-approved ATB examinations. • Search for sample ATB questions relevant to the necessary skills identified for the programs. (if available) • Make a determination whether an alternative ATB examination proposed by an institution is warranted. 	Education Specialist
2. Use the following as a guide to determine the type of educational/occupational program the institution is offering: <ul style="list-style-type: none"> • Request and review the institution’s catalog, 	Education Specialist

<p>mission statement, program description and objectives, course descriptions, faculty resume/CV, course syllabi, copy of quizzes, midterm and final examination. Evaluate all documents for consistency and clarity. Do all the documents support the mission and goal of the program? Does the evaluation of the courses (quizzes, exams) really assess students learning outcomes?</p> <ul style="list-style-type: none"> • Does the program meet the learning objectives? 	
<p>3. Use the following questions as a guide to evaluate the credibility of the proposed examination:</p> <ul style="list-style-type: none"> • Who or what organization developed the examination? What are their qualifications as a test developer? Are they considered an independent agency? • Who administers the examination? • What is the procedure for taking the examination for the first and second time? • How was the passing score established? What is the passing score? 	Education Specialist
<p>4. How to analyze and evaluate the proposed examination:</p> <ul style="list-style-type: none"> • Take the proposed examination under the same time restrictions. • Read the exam content to make sure the exam is free of obvious errors. • Conduct an online search for a similar examination prepared by public or private organizations. • Compare and evaluate the content of the examination competencies with at least two recognized examinations. • Determine the level of the competency of the proposed examination. The level of the competency must be at least at secondary education level. 	Education Specialist

<p>5. Ask the examination developer (the institution) how they determine the validity and reliability of the proposed examination. Ask which of the following specific methods they used to measure the level of validity and reliability.</p> <ul style="list-style-type: none"> • If they compare the proposed examination with a valid examination of the same construct or indirectly with an opposite construct. (This is called Concurrent Validity) • If the content represent all areas of the subject matter. (This is called Content Validity) • If the examination has a component of predictability. (This is called Predictive Validity) • If the same results has been achieved consistently by the same group of subjects who took the examination at two separate occasions. (This is called Test-Retest Reliability) • If they have used a pre-and post-test by constructing two different tests using the same content. (This is called Parallel Forms Reliability) • If the examination has been used by different raters/observers to give consistent estimate of the results. (This is called Inter-Rater Reliability) • Ask for results of each method used to measure the level of the examination validity and reliability. 	<p>Education Specialist</p>
<p>6. Steps following the institution’s response to the above questions:</p> <ul style="list-style-type: none"> • If the institution has not done any method of validity and reliability, stop the alternative ATB evaluation process. <ul style="list-style-type: none"> i. Deny their request for an alternative ATB test. • If they provided any of the above methods for reliability and validity (one for each) ask the following questions? <ul style="list-style-type: none"> i. If they conducted a Concurrent Validity, how did they conduct their comparison? Which test they used to compare their test? ii. If they used Content Validity, how did they ensure all the necessary subject matters 	<p>Education Specialist</p>

<p>had been included in the content?</p> <ul style="list-style-type: none"> iii. If they used Predictive Validity, ask for statistically significant correlation between test scores and the criterion being used to measure the validity of the test. iv. If they used Test-Retest Reliability, ask for the results that were achieved by the same group of subjects on two separate occasions. v. If they used Parallel Forms reliability, ask for the pre-and post-test used for constructing the two different tests. vi. If they conducted an Inter-Rated Reliability, ask if the other raters/observers gave the consistent estimate of the results. vii. Request documentation for all the validity and reliability tests. viii. Assess the data provided by the institution for reliability and validity. 	
<p>7. Evaluate and consider the impact of approving the proposed alternative ATB examination for the Bureau and other institutions.</p>	<p>Education Specialist</p>
<p>8. Make a recommendation to approve or disapprove the proposed alternative ATB examination to management.</p> <ul style="list-style-type: none"> • Write a memo to the management justifying your recommendations. (Use Bureau memo letterhead) 	<p>Education Specialist</p>



Bureau for Private Postsecondary Education Policy

Title: Review of Educational Program(s)	Supersedes: None	Procedure # 2013-0091
Quality of Education Unit	Effective: Immediately	Page: 1 of 5
Issue Date: 7/22/2013	Approved By: JOANNE WENZEL, Bureau Chief Bureau for Private Postsecondary Education	

Policy: Degree and Non-Degree granting institutions are subject to a program review of curriculum to ensure quality of education meets statute and regulation.

Purpose: To ensure educational programs being provided by an institution meet the minimum requirements as required by the California Private Postsecondary Education Act of 2009 and Title 5 of the California Code of Regulations.

Definitions:

- **Private Postsecondary Educational Institution** - A private entity with a physical presence in this state that offers postsecondary education to the public for an institutional charge.
- **Education Specialist** – Bureau for Private Postsecondary Education staff
- **Regulations** – Title 5 of the California Code of Regulations
- **Statutes** – California Private Postsecondary Education Act of 2009

Procedures:

Task	Who is Responsible
1. Upon a thorough review of an Approval-to-Operate application by a Licensing Analyst, the Licensing Manager will request to have the educational programs reviewed by an Education Specialist.	Licensing Manager/Analyst

<p>2. Upon receiving the application, the Education Specialist will review the following to ensure the institution is able to meet the minimum operating standards identified in regulation:</p> <ul style="list-style-type: none"> a. Review the stated Mission and Objectives: <ul style="list-style-type: none"> i. Review for institution consistency in the curriculum ii. Review for learning outcomes b. Review the Educational Programs: <ul style="list-style-type: none"> i. Request and review syllabi ii. Review program graduation requirements iii. Review for program sequence and consistency c. Review the Method of Instruction: <ul style="list-style-type: none"> i. Direct Instruction (in-class instruction) ii. Indirect instruction (distance education) <ul style="list-style-type: none"> 1. Request for a demonstration of the distance education platform 2. Does it provide for meaningful interaction between the faculty and student? iii. Hybrid (in-class and distance education) <ul style="list-style-type: none"> 1. Request for a demonstration of the distance education platform 2. Does it provide for meaningful interaction between the faculty and student? d. Review Faculty Qualifications: <ul style="list-style-type: none"> i. Request resume of all faculty and curriculum developers ii. Request and verify transcripts and foreign transcripts iii. Request employee contracts with the institution. iv. Request for a list of faculty teaching assignments by program and course. <ul style="list-style-type: none"> 1. Is the faculty member qualified to teach the course? Is the faculty member's field of study relevant to the course being taught? Is the necessary degree held? 	<p>Education Specialist</p>
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<ul style="list-style-type: none"> v. Contact the faculty via email or phone to verify affiliation with the institution. e. Review the Administration: <ul style="list-style-type: none"> i. Does the Chief Academic Officer meet the required experience and education? f. Review the Facilities and Equipment: <ul style="list-style-type: none"> i. Review for adequate accommodations for programs ii. Review for adequate equipment for curriculum g. Review the Library and Other Learning Resources: <ul style="list-style-type: none"> i. If a physical library is present: <ol style="list-style-type: none"> 1. Identify the librarian and review his/her qualifications. 2. Review for an adequate collection in relation to the program(s) offered. ii. If library is online: <ol style="list-style-type: none"> 1. Identify the librarian and review his/her qualifications. 2. If possible, have the institution provide a demo of the online resources. 3. Provide any contracts/agreements between the institution and the resource. h. Review the Admission Standards: <ul style="list-style-type: none"> i. Are the minimum admission requirements for an undergraduate student met? ii. Are the minimum admission requirements for a graduate student met? <ol style="list-style-type: none"> 1. Licensing requirements, if applicable. i. Review the Transfer Credit policy: <ul style="list-style-type: none"> i. Is a maximum of 75% allowed for undergraduate programs? Is the General Education unit requirements clearly identified? ii. Is a maximum of 20% allowed for graduate programs? iii. Is a maximum of 30 units allowed for a Doctorate or Doctor of Philosophy program? j. Review the Catalog: <ul style="list-style-type: none"> i. Are all courses required for graduation identified in the catalog? The courses required for graduation should be outlined 	
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<p>in each educational program.</p> <ul style="list-style-type: none"> ii. If necessary, is the course sequence in order? iii. Are the Admission Standards consistent i.e. units, admission, transfer credits between the Catalog, Section 12, and Section 13 of the application. <p>k. Review the Minimum Requirements to Award an Undergraduate Degree:</p> <ul style="list-style-type: none"> i. Does the institution clearly identify the General Education requirements by each subject area? ii. Is the institution requiring a student to complete at least 120 semester units for successful completion of the degree? <p>l. Review the Minimum Requirements to Award a Graduate Degree:</p> <ul style="list-style-type: none"> i. Is the institution requiring a student to complete at least 30 semester units for successful completion of a Master? ii. Is the institution requiring a student to complete at least three years of full-time study beyond the Bachelor's for a Doctorate or Doctor of Philosophy? <ul style="list-style-type: none"> 1. Does the institution have enough faculty members, who meet the requirements, to comprise a doctoral committee? 	
<p>3. If an Institution is Unable to Meet the Minimum Operating Standards:</p> <ul style="list-style-type: none"> a. Provide a Deficiency Letter to the institution. b. Identify the findings (from above) and the facts to support those findings in a deficiency letter to the institution. c. The institution shall have 30 days to respond to the deficiency letter. d. Once an institution responds, review the submission to ensure compliance with the statutes and regulations. e. If an institution is still deficient or further clarification is needed, identify those areas and submit another deficiency letter to the institution. 	<p>Education Specialist</p>

<ul style="list-style-type: none"> f. If the institution still has MINOR deficiencies i.e. then attempt to correct these deficiencies with the institution. g. If the institution has failed to properly address the deficiencies, and the deficiencies are MAJOR, then the application will be recommended for a denial due to the institution's inability to meet the minimum operating standards. h. Provide a Memo to the Bureau Chief with an outline of your facts and findings. i. Provide a Denial Letter to the Bureau Chief with your facts and findings to support those findings. j. The Memo and Denial Letter are to be submitted to the Bureau Chief in one package. Once the denial is approved, the Bureau Chief will provide the Licensing Manager the Denial Letter. 	
<p>4. If an Institution is Able to Meet the Minimum Operating Standards:</p> <ul style="list-style-type: none"> i. Provide a Memo to the Bureau Chief with an outline of your facts, findings, and brief overview of your assessments. ii. If approved, the Bureau Chief will provide the application to the Licensing Manager for further processing. 	<p>Education Specialist</p>



Bureau for Private Postsecondary Education Policy

Title: Role of Education Specialist as an Investigator	Supersedes: None	Procedure #: 2013-0092
Procedure Owner: Quality of Education Unit	Effective: Immediately	Page: 1 of 3
Issue Date: 7/22/2013	Approved By: JOANNE WENZEL, Bureau Chief Bureau for Private Postsecondary Education	

Policy:

An Education Specialist, if requested by the Enforcement Unit, may act alone or accompany an Enforcement Investigation Analyst, to investigate deficiencies outlined in the statute and regulation of a Private Postsecondary Educational Institution.

Purpose:

To perform a more thorough review of areas deficient and/or gather further evidence to further support or nullify deficiencies identified as a result of a compliance inspection.

Definitions:

- **Compliance Analyst** - Bureau for Private Postsecondary Education staff
- **Enforcement Investigation Analyst** - Bureau for Private Postsecondary Education staff
- **Private Postsecondary Educational Institution** - A private entity with a physical presence in this state that offers postsecondary education to the public for an institutional charge.
- **Education Specialist** – Bureau for Private Postsecondary Education staff
- **Regulations** – Title 5 of the California Code of Regulations
- **Statutes** – California Private Postsecondary Education Act of 2009

Procedures:

Task	Who is Responsible
<p>1. Education Specialist is notified of the upcoming investigation.</p> <ul style="list-style-type: none"> a. Contact the Investigation Analyst to provide materials that may be required for the investigation. For example: <ul style="list-style-type: none"> 1. Catalog; 2. Class Schedule; 3. Faculty Information, etc. b. Review areas that have been identified by the Compliance Analyst that are deficient and need further evaluation. c. Prior to visit, make sure to review materials, website, chat-rooms, etc. relating to the investigation. d. Identify areas of deficiency that are of importance to further support the compliance analyst's claims. 	<p>Education Specialist</p>
<p>2. On-Site: Determine if the complaint is in violation of the regulation, specifically the minimum operating standards, beginning with 5, CCR § 71700.</p> <ul style="list-style-type: none"> a. For every finding that is a violation of the statute or regulation, provide facts i.e. copy of documents, quote or paraphrase interviews, etc. that will support those findings. 	<p>Education Specialist</p>
<p>3. If necessary, interview the administration and faculty surrounding the basis of the investigation. For example, possible questions may be:</p> <ul style="list-style-type: none"> a. What are the policy and procedures used by the institution? b. Was the issue identified by students, faculty, or administration? Are there any documented 	<p>Education Specialist</p>

<p>attempts to correct it?</p> <ul style="list-style-type: none"> c. Do you feel the policy and procedures are adequate? d. Are the policy and procedures enforced? e. How long has this been going on? Why hasn't it been corrected sooner? f. Why is the institution not following its Self-Monitoring Procedures to ensure compliance with the statute or regulation? 	
<p>4. The Education Specialist and Investigation Analyst shall provide one report to the Enforcement Unit (Complaint Manager) to provide the facts and findings to support those findings of the investigation.</p>	<p>Education Specialist and Investigation Analyst</p>



Bureau for Private Postsecondary Education Policy

Title: Role of Education Specialist on a Compliance Visit	Supersedes: None	Procedure # 2013-0093
Quality of Education Unit	Effective: Immediately	Page: 1 of 6
Issue Date: 7/22/2013	Approved By: JOANNE WENZEL, Bureau Chief Bureau for Private Postsecondary Education	

Policy: *An Education Specialist, if requested by the Compliance Unit, may accompany a Compliance Analyst on a routine compliance inspection.*

Purpose: *To ensure approved educational programs provided by an institution meets the minimum requirements as required by the California Private Postsecondary Education Act of 2009 and Title 5 of the California Code of Regulation.*

Definitions:

- **Compliance Analyst** – Bureau for Private Postsecondary Education Staff
- **Education Specialist** – Bureau for Private Postsecondary Education staff
- **Private Postsecondary Educational Institution** - A private entity with a physical presence in this state that offers postsecondary education to the public for an institutional charge.
- **Regulations** – Title 5 of the California Code of Regulations
- **Statutes** – California Private Postsecondary Education Act of 2009

Procedures:

Task	Who is Responsible
1. Education Specialist is notified of the upcoming compliance visit. a. Contact the Compliance Analyst to provide materials that may be required for the visit. For example:	Education Specialist and Compliance Analyst

<ul style="list-style-type: none"> i. Catalog; ii. Class Schedule; iii. Faculty Information, etc. iv. Faculty Handbook <p>b. Prior to visit, make sure to review material and website.</p>	
<p>2. On-Site: Determine if the institution is in compliance with regulation, specifically the minimum operating standards, beginning with 5, CCR § 71700. The Education Specialist is to assess the institution's ability to deliver the program as stated in its mission and the objectives underlying each educational program.</p> <ul style="list-style-type: none"> a. Review the stated Mission and Objectives: <ul style="list-style-type: none"> i. Review for institution consistency in the curriculum ii. Review for learning outcomes b. Review the Educational Programs: <ul style="list-style-type: none"> i. Request and review syllabi ii. Review program graduation requirements iii. Review for program sequence and consistency c. Review the Method of Instruction: <ul style="list-style-type: none"> i. Direct Instruction (in-class instruction) ii. Indirect instruction (distance education) <ul style="list-style-type: none"> 1. Request for a demonstration of the distance education platform 2. Does it provide for meaningful interaction between the faculty and student? 3. Have the institution provide access to an active class and access to a previous class. iii. Hybrid (in-class and distance education) <ul style="list-style-type: none"> 1. Request for a demonstration of the distance education platform 2. Does it provide for meaningful interaction between the faculty and student? 3. Have the institution provide access 	<p>Education Specialist</p>

<p>to an active class and access to a previous class.</p> <p>d. Review Faculty Qualifications:</p> <ul style="list-style-type: none">i. Request faculty files:<ul style="list-style-type: none">1. Verify transcripts and degrees2. Foreign transcripts must be evaluated by a member of the National Association of Credential Evaluation Services3. Review employment contracts with the institution and courses hired to teach. Is he/she teaching those courses?4. Select about 10% of faculty members to interview, but no less than three (3) faculty members must be interviewed.e. Request for a list of faculty teaching assignments by program and course.<ul style="list-style-type: none">i. Is the faculty member qualified to teach the course? Is the faculty member's field of study relevant to the course being taught? Is the necessary degree held?f. Review the Administration:<ul style="list-style-type: none">i. Does the Chief Academic Officer meet the required experience and education?ii. Interview the Chief Academic Officer.<ul style="list-style-type: none">1. How long employed?2. How much time committed to the institution?3. Who oversees the various departments in regards to curriculum development?4. How is curriculum developed?5. If applicable, how are doctoral committees formed?6. If adjunct faculty is used on a doctoral committee, how is that possible?g. Review the Facilities and Equipment:<ul style="list-style-type: none">i. Does the institution have adequate accommodations for the stated	
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- programs?
- ii. Does the institution have adequate equipment for curriculum?
- h. Review the Library and Other Learning Resources:
 - i. If a physical library is present:
 - 1. Identify the librarian and review his/her qualifications
 - 2. Review for an adequate collection in relation to the program(s) offered.
 - 3. If applicable, review theses and dissertations at the institution's library to assess student work.
 - ii. If library is online:
 - 1. Identify the librarian and review his/her qualifications.
 - 2. If possible, have the institution provide a demo of the online resources.
 - 3. Provide any contracts/agreements between the institution and the resource.
- i. Review the Admission Standards:
 - i. Are the minimum admission requirements for an undergraduate student met?
 - ii. Are the minimum admission requirements for a graduate student met?
 - 1. Licensing requirements, if applicable.
- j. Review the Transfer Credit policy:
 - i. Is a maximum of 75% allowed for undergraduate programs? Are the General Education unit requirements clearly identified?
 - ii. Is a maximum of 20% allowed for graduate programs?
 - iii. Is a maximum of 30 units allowed for a Doctorate or Doctor of Philosophy program?
- k. Review the Catalog:

<ul style="list-style-type: none"> i. Are all courses required for graduation identified in the catalog? The courses required for graduation should be outlined in each educational program. ii. If necessary, is the course sequence in order? I. Review the Minimum Requirements to Award an Undergraduate Degree: <ul style="list-style-type: none"> i. Does the institution clearly identify the General Education requirements by each subject area? ii. Is the institution requiring a student to complete at least 120 semester units for successful completion of the degree? m. Review the Minimum Requirements to Award a Graduate Degree: <ul style="list-style-type: none"> i. Is the institution requiring a student to complete at least 30 semester units for successful completion of a Master? ii. Is the institution requiring a student to complete at least three years of full-time study beyond the Bachelor's for a Doctorate or Doctor of Philosophy? <ul style="list-style-type: none"> 1. Does the institution have enough faculty members, who meet the requirements, to comprise a doctoral committee? iii. Review theses and dissertations to assess student work. 	
<p>3. Quality of Education Deficiencies Have Been Identified:</p> <ul style="list-style-type: none"> a. For every finding that is identified, ensure documents are provided to support those findings. b. Provide a report to the Bureau Chief identifying the facts and findings to support those findings. c. The facts and findings will be provided to the Enforcement Section for further action. 	<p>Education Specialist</p>



Bureau for Private Postsecondary Education Policy

<p>4. Quality of Education Contains No Deficiencies</p> <ul style="list-style-type: none">a. Provide a report to the Bureau Chief that the institution is in compliance and no further action is required.	<p>Education Specialist</p>
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Title: SB 1247 Accreditation Plan Review Procedures	Supersedes: New	Procedure #: 2015-0012
Procedure Owner: Quality of Education Unit	Effective: Immediately	Page: 1 of 6
Issue Date: March 30, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *To review and evaluate approved Private Postsecondary degree granting, unaccredited institution's accreditation plans in accordance with Division 7.5 of Title 5 of the California Code of Regulations section, 71105.5 (5, CCR) and the California Private Postsecondary Education Act of 2009 (CEC), section 94885.1*

Purpose: *Describes the tasks associated with the review and evaluation of an accreditation plan.*

Definitions:

Accreditation Plan: A document that "at minimum identifies an accrediting agency recognized by the United States Department of Education from which the institution will seek accreditation, with the scope of that accreditation covering the offering of at least one degree program, and outlines the process by which the institution will achieve accreditation candidacy or pre-accreditation by July 1, 2017, and full accreditation by July 1, 2020" (CEC, 2015, p. 31).

Productivity Benchmark: *It is estimated that the tasks of reviewing and evaluating an accreditation plan may take approximately 1 hour to complete. To enter the initial data into the Quality of Education Unit's Microsoft Access Database, approximately 15 minutes.*

**Quality of Education Unit
SB 1247 Accreditation Plan Review Procedures**

**Quality of Education (QEU) Accreditation Plan Review Procedures
Desk Review for Bureau Approved Degree Granting Institutions**

1. Letter informing institutions of the Accreditation Plan
 - a. On January 30, 2015, the Bureau for Private Postsecondary Education (Bureau) outreach team forwarded a letter to each unaccredited, Bureau approved, degree granting institution describing an overview of SB1247 with respect towards the accreditation plan.
 - b. Each institution is required to submit to the Bureau their plan to become accredited by July 1, 2015, per section 71105.5 of Division 7.5 of Title 5 of the California Code of Regulations (5, CCR).

2. Accreditation Plans or Accreditation Confirmation Documentation Received into the Bureau
 - a. Forward all accreditation plans and accreditation confirmation documentation to the QEU Office Technician.

3. QEU Office Technician Tasks
 - a. The Office Technician will perform the following tasks:
 - i. Ensure that the accreditation plan or accreditation documentation has received a date timestamp.
 - ii. The Office Technician will enter data from the respective documents into the QEU Microsoft Access Database.
 1. In the Institution Information section of the Access database, enter the address of the school if the school address is not listed (Figure A).
 2. Enter the accreditation information into the Accreditation form located in the Accreditation Information tab situated in the Institution Specifics section of the database (Figure B).

Institution Information

1. Institution Internal ID: 261

2. Name of Institution: COURTESY

3. Institution Number: [REDACTED]

4. Type of Program: [REDACTED]

5. Address: 1415

6. Street Name: [REDACTED]

7. Suite: 2244

8. Street Suffix: WAY

9. U.S. Street Abbreviations

10. Bureau Staff Legend

11. Worker Friendly Reports

12. Add a New Record

13. Find a Record

Figure A

Accreditation	
Reviewer of the Accreditation Plan	<input type="text"/>
Accreditation Information Letter Sent	<input type="text"/>
Accreditation Plan Received Into the Bureau	<input type="text"/>
Accreditation Plan Returned to the Institution (Put particulars in the comment section)	<input type="text"/>
Revised Accreditation Plan Received	<input type="text"/>
Accreditation Plan Approved?	<input type="checkbox"/>
Confirmation Accreditation Letter Received Into the Bureau	<input type="text"/>
Date of Accreditation	<input type="text"/>
Accreditor's Name	<input type="text"/>
Comments	<input type="text"/>

Figure B

3. For institutions that have sent the Bureau an accreditation plan, enter the date the plan was received into the “Accreditation Plan Received into the Bureau” field (Figure B).
4. For institutions that have sent the Bureau an accreditation confirmation document, enter the date the document was received into the “Confirmation Accreditation Letter Received into the Bureau” field (Figure B).
5. After the database entry, the Office Technician will legibly print the words “QEU Received,” the date of the entry, and his or her initials in the header section of the document on the right hand side.
6. The Office Technician will forward all documents that have been updated in the Access database and appropriately initialed to the Education Administrator.
7. After review and evaluation of all documents by the Education Administrator and Education Specialists, the Office Technician will file the documents in the institution’s application folder that is maintained in the Bureau’s file room.
8. File the documents in Flap 1(Accreditation letters/plans) of the Green Folder that accompanies the institution’s “Expand-a-Flex” file folder.

4. QEU Education Administrator Tasks

- a. The Education Administrator will initially assess the accreditation plans and accreditation confirmation documents.
- b. Assign the accreditation plans and accreditation confirmation documents to an Education Specialist. Update assignments in the QEU Access database (Figure B).
- c. Distribute the accreditation plans and accreditation confirmation documents to the Education Specialists.

5. QEU Education Specialist Tasks

- a. The Education Specialist receives an accreditation plan or an accreditation confirmation document from the Education Administrator.
- b. The Education Specialist will review the accreditation plan and accreditation confirmation document in accordance with 5, CCR section, 71105.5 and the California Private Postsecondary Education Act of 2009 (CEC), section 94885.1.
- c. The Education Specialist will update (if applicable) the accreditation data into the Access database as follows:
 - i. The "Accreditation Information Letter Sent" field is pre-populated with the date, January 30, 2015. This is the date that all Bureau approved, unaccredited, degree granting institutions were sent an accreditation plan letter from the Bureau.
 - ii. The "Accreditation Plan Received into the Bureau" field is populated by the Office Technician. If a plan has been received, the date should reflect the actual date the plan was received by the Bureau.
 - iii. Populate the "Accreditation Plan Returned to the Institution" field with the date the accreditation plan was returned to the institution or the date the originator was informed to revise the plan via e-mail or phone. Update the "Comments" section with details.
 - iv. Populate the "Revised Accreditation Plan Received" field with the date the revised plan was received into the Bureau.
 - v. Check the "Accreditation Plan Approved" box if the plan is approved or if a valid confirmation accreditation letter has been received by the Bureau.
 - vi. If the institution has submitted an accreditation confirmation letter, the Office Technician will update the "Confirmation

- Accreditation Letter Received Into the Bureau” field with the date the letter was received into the Bureau.
- vii. Populate the “Date of Accreditation” with the date the institution was accredited by the accreditor.
 - viii. Enter the accreditor’s name in the “Accreditor’s Name” field.
 - ix. Enter concise and explicit comments into the “Comments” field. Enter comments such as the expiration of the initial or renewed accreditation, or any comments that pertain to the accreditation process that may be of importance to the Bureau.
- d. Ensure that each plan is compared with the accreditor’s accreditation requirements and that the accreditor is recognized by the U.S. Department of Education. Visit the hyperlink below to review those accreditors that are recognized by the U.S. Department of Education:
~~<http://qep.ed.gov/accreditation/Agencies.aspx>~~
- e. Contact the institution if there is a need to clarify information regarding the accreditation plan. Work closely with the institution to ensure that the plan is completed and received into the Bureau by July 1, 2015.
 - f. After completion of review and approval, forward documents to the QEU Office Technician for filing.
 - g. If a plan is reviewed and does not meet approval conditions after numerous communication efforts with an institution, discuss the plan with the Education Administrator before denying.
 - h. Review the following accreditation reports after update:
 - i. Accreditation Plan Snapshot.
 - ii. Institution Accreditation Detailed Information.

**DISCIPLINE
UNIT
PROCEDURES**

BUREAU CHIEF		
Title: Case Closure	Supersedes: May 20, 2013	Procedure #: 2013-0035
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 2
Issue Date: February 20, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

1. *Obtaining an approval to operate by fraud.*
2. *A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: *This procedure documents the process for Case Closure to ensure consistent results. On the effective date, the Decision and Order is public information and should be posted to the Bureau's website and the Department of Consumer Affairs (DCA) should have a press release.*

After the effective date, the institution's approval to operate will be revoked and the owner will be required to comply with the Decision and Order, including payment of restitution and/or cost recovery

Title: Case Intake and Input	Supersedes: May 20, 2013	Procedure #: 2013-0036
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 3
Issue Date: February 20, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

1. *Obtaining an approval to operate by fraud.*
2. *A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: *The Complaints and Investigations Unit Manager gives the case to the Office Technician (OT) to open a complaint in Schools Automated Information Link (SAIL) Database (if the case does not already have a case number), assign the case to the Discipline Analyst, and prepare the discipline file.*

Bureau for Private Postsecondary Education Procedure

If the Bureau receives additional complaints concerning the school, the Complaints Investigations Unit Manager will determine if the complaint is related to the case that has been forwarded to the Deputy Attorney General (DAG) or if the case should be investigated.

If the complaint is related to the case that has been sent to the Attorney General (AG), the Discipline Analyst should send a copy of the complaint to the Deputy Attorney General (DAG) and close the complaint case in SAIL.

Productivity Benchmarks: *The time spent for the Office Technician to create a file and process a Discipline Referral, on average, will take approximately one hour.*

Procedures:

Task	Who is Responsible
Create Case File	
<ol style="list-style-type: none"> 1. Discipline Referrals received from the Administration Unit, Compliance Unit, Education Specialist Unit, Licensing Unit or BPPE Management 2. Fill in the following information in SAIL under Enforcement/Complaints, you will need to Add an Enforcement File Manually <ul style="list-style-type: none"> • Complainant Information: First Name: BPPE; Last Name: Enforcement • Current (assigned) Staff: choose the name of the Discipline Analyst • Enforcement File Type: choose "Enforcement" • Fill out the remaining sections in SAIL 	Office Technician
<ol style="list-style-type: none"> 1. Create blue page inserts entitled Discipline Referral, Note to File, AG Transmittal, Correspondence, and Evidence 	Office Technician
<ol style="list-style-type: none"> 2. On the Discipline Referral blue page put the following information: <ol style="list-style-type: none"> a. Discipline Received Date: b. Referred From: (Unit Name, Person Referring) 	Office Technician

c. Complaint/Case No.:	
<p>4. Create a Case File Label with the following information:</p> <ul style="list-style-type: none"> a. Schools name on top of the label b. Institution code or UA (unapproved) on the bottom left corner of label c. SAIL case number on the right bottom corner of label d. Place the case file label on the bottom right corner 	Office Technician
<p>5. On the outside of the file folder:</p> <ul style="list-style-type: none"> e. Staple the Administrative Hearing Checklist form onto the folder 	Office Technician
<p>6. On the inside of the folder:</p> <ul style="list-style-type: none"> f. Left side: Place a Note to File blue paper hole punched in the prongs and Quick View Report g. Right side: Place the Discipline Referral blue page hole punched in the prongs 	Office Technician
<p>7. The remaining blue page inserts: AG Transmittal, Correspondence, and Evidence can be placed in the file, hole punched in the prongs.</p>	Office Technician
Input Case Information In Tracking Log	
<p>1. Open the AG Case Aging Log which is located in:</p> <ul style="list-style-type: none"> a. calhnpa/enforcement/tracking_logs substantive/tracking logs 	Office Technician
<p>2. Click on the Open AG Cases tab located at the bottom of the document</p>	Office Technician
<p>3. Input the following information:</p> <ul style="list-style-type: none"> a. #: Status of the case: 1=Open b. Date Rec'd: (Enter the date the Discipline Unit received this referral) c. Staff Assigned d. Case Number e. School: (input entire school name) 	Office Technician

f. School #: (input institution code)	
4. The Discipline Analyst will be responsible for inputting the information in the remaining cells.	Office Technician



Bureau for Private Postsecondary Education Procedure

BUREAU CHIEF		
Title: Case Tracking	Supersedes: May 20, 2013	Procedure #: 2013-0037
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 4
Issue Date: February 20, 2015	Approved By:  Alyson Cooney, Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

- 1. Obtaining an approval to operate by fraud.*
- 2. A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: *The Complaints and Investigations Unit Manager gives the case to the Office Technician (OT) to track a case in SAIL. Discipline case information should be tracked in SAIL, AG Case Aging Log, Note to File, and Microsoft Outlook Calendar.*

The AG Case Tracking Log is found in the G Drive under: g:\bppe\bppe enforcement\tracking logs and statistics\tracking logs. Be sure to update each section of the Log.

Every case file should include a Note to File. Use this form to document all activity regarding the case including management approval on actions that need to be taken.

Currently, the Discipline Unit is using Microsoft Outlook Calendar as a tracking system for discipline cases. Document all activity regarding the case on the calendar.

Productivity Benchmarks: The time spent tracking a case will vary greatly depending on the communication between the Attorney General’s office and the specific action that took place; however, the Discipline Analyst, on average, will spend approximately 30 minutes tracking a case.

Procedures:

Task	Who is Responsible
Tracking Systems	
1. SAIL <ul style="list-style-type: none"> a. For an Approved School Case <ul style="list-style-type: none"> i. Open SAIL ii. In the “School Information” section enter school code iii. Click the Add/View comment tab at the top iv. Click the Add Comment Box v. Type information into box and be sure to include the complaint case number. vi. Click Add Comment b. For an Approved and Unapproved School Case <ul style="list-style-type: none"> i. Open SAIL ii. In the “Enforcement/Complaints” Section enter complaint number iii. Click the Add/View comment tab at the bottom iv. Click the Add Comment Box v. Type information notes into the box vi. Click Add comment 	Discipline Analyst
2. Ag Case Tracking Log	Discipline Analyst

<p>a. The AG Case Tracking log is located in the G Drive under: g:\bppe\bppe enforcement\tracking logs and statistics\tracking logs</p> <p>b. Update the following information on the log:</p> <ol style="list-style-type: none"> 1. Date transmittal was sent to the AG's Office 2. Date status was requested 3. Who the assigned DAG is 4. Date Accusation or Statement of Issues Draft was received from the DAG 5. Date Accusation or Statement of Issues was signed by BPPE 6. Date the Accusation or Statement of Issues was served 7. Date Notice of Defense was received 8. Date Default was requested 9. Date Stipulation or Default was received 10. Hearing Date 11. Decision Effective Date 12. Date withdrawn 13. Case Closure Date 14. Action-comments 	
<p>3. Note to File</p> <p>a. The Note to File is kept in the left side of the case file and should be updated with all monitoring information.</p>	<p>Discipline Analyst</p>

<p>4. Microsoft Outlook Calendar</p> <ul style="list-style-type: none">a. Open Microsoft Outlookb. Open the Microsoft Calendarc. Double click on the date of your event.d. Type the name of the school in the subject linee. Type information notes with updates and follow up datef. Click on the Save button	<p>Discipline Analyst</p>
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Bureau for Private Postsecondary Education Procedure

Title: Preparing the AG Transmittal Memorandum	Supersedes: May 20, 2013	Procedure #: 2013-0038
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 6
Issue Date: February 20, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

- 1. Obtaining an approval to operate by fraud.*
- 2. A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: *This procedure documents the process for preparing the Ag Transmittal memorandum to ensure consistent results. The AG Transmittal Memorandum is sent to the Supervising Deputy Attorney General (SDAG) in one of the five AG field offices throughout the state, according to the area in which the violation(s) occurred. The AG field offices are located in Los Angeles, Oakland, Sacramento, San Diego, and San Francisco.*



Bureau for Private Postsecondary Education Procedure

Typically, the transmittal requests the preparation of a legal pleading that specifies the charges against the respondent (licensee or applicant). The legal pleading prepared is either a Statement of Issues (for applicant denials) or an Accusation (for licensees).

A Statement of Issues is the legal pleading which states the charges against a license applicant and the Bureau's authority to take action. The DAG prepares the Statement of Issues and forwards it to the Bureau for the Bureau Chief's signature. Once signed, the DAG serves/mailed the Statement of Issues on the respondent.

An accusation is a legal pleading that states the charges against the respondent and the Bureau's authority to take action. The DAG drafts the Accusation and forwards it to the Bureau for the Bureau Chief's signature. Once signed, the DAG serves/mailed the Accusation on the respondent.

A respondent can request an administrative hearing in a citation case. When this happens, a transmittal is sent requesting an administrative hearing date and a legal pleading does not need to be prepared.

Productivity Benchmarks: The time spent preparing an AG transmittal will vary depending on the size of the case; however, the Discipline Analyst, on average, will spend approximately eight (8) hours preparing the AG transmittal memo.

Definitions:

Material violations include, but are not limited to, misrepresentation, fraud in the inducement of a contract, and false or misleading claims or advertising, upon which a student reasonably relied in executing an enrollment agreement and that resulted in harm to the student.

Procedures:

Task	Who is Responsible
1. Review the licensing file to confirm who the owner(s) of the school are and that the information accurately matches SAIL.	Discipline Analyst

<p>2. Request a licensing certification from the Bureau Custodian of Records Liaison.</p>	<p>Office Technician</p>
<p>3. Review the regulations on the discipline referral worksheet and add any other appropriate regulations.</p>	<p>Discipline Analyst</p>
<p>4. Prepare the AG Transmittal Memorandum.</p> <ul style="list-style-type: none"> a. Date b. Mark what AG field office will be preparing the legal pleading. c. To: Address transmittal to the Supervising Deputy Attorney General. d. From: Type in Discipline Analysts name and phone number e. Subject: Type of Legal Pleading the Bureau is Requesting f. School owner(s): Verify all owners names in licensing file and SAIL, use owners address of record g. School code number, school name, and school address of record. h. Include any other addresses you may have for the owner(s). i. Bureau Case Number. j. Summary: Be sure to request the preparation of an Accusation, Statement of Issues, or request for an administrative hearing. Give a summary of case details. k. Make two copies of the attachments. One copy for the case file and one for the transmittal. l. Attachments: <ul style="list-style-type: none"> 1. SAIL Quick view printout 2. Licensing Certification 3. Correspondence to and from the Bureau 4. Investigation Report(s) (if accusation 	<p>Discipline Analyst</p>

<p>request)</p> <ol style="list-style-type: none"> 5. Compliance Reports (if available) 6. Notice to Comply (if issued) 7. Citation (if issued) 8. Evidence <p><i>Include all the applicable/related statutory regulation sections</i></p>	
<p>5. If the AG Transmittal is regarding a request for an administrative hearing by the respondent in a citation case, follow the procedures above except:</p> <ol style="list-style-type: none"> a. Subject: Appeal of Citation/Request for an Administrative Hearing b. Summary: Give a summary of the citation. A pleading does not need to be drafted. c. Attachments <ol style="list-style-type: none"> 1. SAIL Quick view printout 2. Copy of Citation 3. Copy of signed Notice of Appeal of Citation/Request for an Administrative Hearing 4. Licensing Certification 5. Correspondence to and from the Bureau 	Citation Analyst
<p>6. Have the Discipline Unit Manager review and approve package in the Note to File before sending.</p>	Discipline Analyst
<p>7. Send package certified mail.</p> <ol style="list-style-type: none"> a. In the "Sender" section of the PS Form 3811 (green card), stamp the Bureau's address and write your name at the bottom of the card. b. In the "Article Addressed to" section 1 on the other side of the green card, write the appropriate SDAG's address. c. Place certified mail number from PS Form 3800 in the "Article Number" section 2 of the green card. 	Office Technician



Bureau for Private Postsecondary Education Procedure

d. In section 3 of the green card check the “Certified Mail & Return Receipt for Merchandise” boxes of the green card.	
8. Create a tickle file for 30 <u>day</u> follow up.	Discipline Analyst
9. Fill in the Administrative Hearing Checklist (sheet on outside of the case file).	Discipline Analyst
10. Update SAIL, AG Log, Note to File and Outlook Calendar.	Discipline Analyst



ATTORNEY GENERAL TRANSMITTAL MEMORANDUM

DATE: **xxxxx**

TO: **xxxxx**
Supervising Deputy Attorney General
Attorney General’s Office

AG Field Office

- Sacramento
- San Francisco
- Los Angeles
- San Diego

FROM: **Name of Discipline Analyst**
Discipline Analyst
(916) 431-69**xx**

SUBJECT: **Type of Legal Pleading the Bureau is Requesting**

School Owner
Address of Record

School Code Number
School Name
School Address of Record

School Owner (if more than one)
Address of Record

Additional known addresses

Branch Code Number (if school has a branch)
Branch Address of Record

Satellite Code Number (if school has a Satellite)
Satellite Address of Record

BUREAU CASE NO.: **xxxx**

The Bureau for Private Postsecondary Education (Bureau) requests the preparation of an **Accusation or Statement of Issues** against the above-named individual based upon the attached information.

Give summary of explanation request.

If you have any questions or need further information, please contact me.

The applicable/related statutory sections are:

Attachments:

1. **xxxx**

Title: <i>Proposed Decision</i>	Supersedes: May 20, 2013	Procedure #: 2013-0039
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 5
Issue Date: February 20, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

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2. *A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: *This procedure documents the process for the Proposed Decision to ensure consistent results. Within **30 days** from the date of the hearing, the ALJ submits the Proposed Decision to the Bureau for the Director of DCA consideration.*

*According to the APA Section 11517, **thirty (30) days** after the receipt by the agency of the proposed decision, a copy of the proposed decision shall be filed by the agency as a*

public record and a copy shall be served by the agency on each party and his or her attorney. The filing and service is not an adoption of a proposed decision by the agency.

*Within **100 days** of receipt by the agency of the ALJ's proposed decision, the agency may act as prescribed in subparagraphs (A) to (E) of the APA section 11517, inclusive, within **100 days** of receipt of the proposed decision, the proposed decision shall be deemed adopted by the agency.*

The decision of the agency shall be filed immediately by the agency as a public record and a copy shall be served by the agency on each party and his or her attorney by registered mail.

Productivity Benchmarks: The time spent working on a proposed decision will vary depending on the size of the case and amount of information necessary to enclose with the memo; however, the Discipline Analyst, on average, will spend approximately one hour working on a proposed decision.

Definitions:

The Discipline Analyst is responsible for preparing and monitoring cases sent to the Office of the Attorney General (AG).

Material violations include, but are not limited to, misrepresentation, fraud in the inducement of a contract, and false or misleading claims or advertising, upon which a student reasonably relied in executing an enrollment agreement and that resulted in harm to the student.

*Copies of Decision to Parties - According to the APA Section 11518, within **15 days** after service of a copy of the decision on a party, but not later than the effective date of the decision, the party may apply to the agency for correction of a mistake or clerical error in the decision, stating the specific ground on which the application was made. Notice of the application shall be given to the other parties in the proceeding.*

*Application to Correct Mistake or Error in Decision - According to the APA Section 11518.5, the agency shall, within **15 days** after correction of a mistake or clerical error*

in the decision, serve a copy of the correction on each party on which a copy of the decision was previously served.

*Effective Date of Decision - According to the APA Section 11519, the decision shall become effective **30 days** after it is delivered or mailed to respondent unless: a reconsideration is ordered within that time, or the agency itself orders that the decision shall become effective sooner, or a stay of execution is granted. [APA 11519 (a)]*

Order of Restitution for Financial Loss or Damages - According to the APA Section 11519.1, a decision rendered against a licensee under Article 1 (commencing with section 11700) of Chapter 4 of Division 5 of the Vehicle Code may include an order of restitution for any financial loss or damage found to have been suffered by a person in the case. The failure to make the restitution in accordance with the terms of the decision is separate grounds for the Department of Motor Vehicles to refuse to issue a license and constitutes a violation of the terms of any applicable probationary order in the decision. [APA Sections (a-c)]

Reconsideration - According to the APA Section 11521, the Agency itself may order a reconsideration of all or part of the case on its own motion or on petition of any party. The agency shall notify a petitioner of the time limits for petitioning for reconsideration. The power to order a reconsideration shall expire 30 days after the delivery of mailing of a decision to a respondent, or on the date set by the agency itself as the effective date of the decision if that date occurs prior to the expiration of the 30 day period or at the termination of a stay of not to exceed 30 days which the agency may grant for the purpose of filing an application for reconsideration. If additional time is needed to evaluate a petition for reconsideration filed prior to the expiration of any of the applicable periods, an agency may grant a stay of that expiration for no more than 10 days, solely for the purpose of considering the petition. If no action is taken on a petition within the time allowed for ordering reconsideration, the petition shall be deemed denied.

Reinstatement of License or Reduction of Penalty - According to the APA Section 11522, a person whose license has been revoked or suspended may petition the agency for reinstatement or reduction of penalty after a period of not less than one year has elapsed from the effective date of the decision or from the date of the denial of a similar petition. The agency shall give notice to the Attorney General of the filing of the

petition and the Attorney General and the petitioner shall be afforded an opportunity to present either oral or written argument before the agency itself. The agency itself shall decide the petition, and the decision shall include the reasons therefor, and any terms and conditions that the agency reasonably deems appropriate to impose as a condition of reinstatement. This section shall not apply if statutes dealing with the particular agency contain different provisions for reinstatement or reduction of penalty.

Procedures:

Task	Who is Responsible
1. The Discipline Analyst processes the proposed decision and sends it to the DCA Legal Affairs Office to be considered and affirmed by the Director.	Discipline Analyst
2. Prepare a cover memo for the proposed decision package.	Discipline Analyst
3. Make a copy of entire package for the case file.	Discipline Analyst
4. Send via interoffice mail.	Discipline Analyst
5. The proposed decision and order will be sent back to the Bureau after the Deputy Director of Legal Affairs signs it.	Discipline Analyst

MEMORANDUM

DATE	Date
TO	XXXXXXXXXX XXXXXXXXXX Department of Consumer Affairs
FROM	Name Discipline Analyst Bureau for Private Postsecondary Education
SUBJECT	RECOMMENDATION TO ADOPT PROPOSED DECISION AND DECISION ORDER

Enclosed for consideration by the Director of Consumer Affairs is the Proposed Decision and Order in the matter against **xxxx**, Owner of **xxxx**.

If you have any questions or need additional information, please contact **xxxx** at (916) 431-69**xx**.



Bureau for Private Postsecondary Education Procedure

Title: <i>Serving a Signed Decision and Order</i>	Supersedes: May 20, 2013	Procedure #: 2013-0040
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 4
Issue Date: February 20, 2015	Approved By: Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	
BUREAU CHIEF		

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

- 1. Obtaining an approval to operate by fraud.*
- 2. A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: *This procedure documents the process for Serving a Signed Decision and Order to ensure consistent results. On the effective date, the Decision and Order is public information and should be posted to the Bureau's website and DCA should have a press release.*



Bureau for Private Postsecondary Education Procedure

After the effective date, the institution's approval to operate will be revoked and the owner will be required to comply with the Decision and Order, including payment of restitution and/or cost recovery.

Productivity Benchmarks: The time spent serving a signed decision will vary depending on the size of the case and the number of individuals the signed decision needs to be mailed to; however, the Discipline Analyst, on average, will spend approximately two hours working on a signed decision and order.

Definitions:

The Discipline Analyst is responsible for preparing and monitoring cases sent to the Office of the Attorney General (AG).

Material violations include, but are not limited to, misrepresentation, fraud in the inducement of a contract, and false or misleading claims or advertising, upon which a student reasonably relied in executing an enrollment agreement and that resulted in harm to the student.

Procedures:

Task	Who is Responsible
1. Decision and Order a. Make sure the Decision is signed. b. Type or stamp the effective date which should be 30 days from the date of mailing.	Discipline Analyst
2. Declaration of Service a. Prepared and signed by sender. b. An <u>unsigned</u> copy of Declaration of Service should be mailed to the respondent and respondent's attorney (if applicable). c. A <u>signed</u> copy is mailed to the DAG.	Discipline Analyst
3. Make Copies a. Keep original signed documents for the case file.	Office Technician

<ul style="list-style-type: none"> b. Two (2) copies for each address of the respondent (one certified and one regular mail). c. Two (2) copies for the respondent's attorney (one certified and one regular mail). d. One copy for the DAG. e. One copy for the Decision and Orders binder. 	
<p>4. Prepare Certified Mail Postage.</p> <ul style="list-style-type: none"> a. In the "Sender" section of the PS Form 3811 (green card), stamp the Bureau's address and write your name at the bottom of the card. b. In the "Article Addressed to" section 1 on the other side of the green card, write the address or prepare an address label. c. Remember: Use the Respondent's address as it is written on the Decision. d. Place certified mail number from PS Form 3800 in the "Article Number" section 2 of the green card. <p>In section 3 of the green card check the "Certified Mail & Return Receipt for Merchandise" boxes of the green card.</p>	Office Technician
<p>5. Mailing Documents</p> <ul style="list-style-type: none"> a. Mail documents certified and regular mail to all applicable addresses (including address of record) to the respondent. b. Mail documents certified and regular mail to respondent's lawyer (if applicable). c. Documents being mailed to Respondent/Lawyer should include 	Office Technician

<p><u>unsigned</u> copy of Declaration of Service. d. Mail documents to the DAG.</p>	
<p>6. Press Release a. Give a copy of the Decision and Order to the Bureau Chief so a press release can be requested <u>for the effective date</u>.</p>	<p>Discipline Analyst</p>
<p>7. Bureau Website a. Scan decision and order and email it to yourself. b. Save a copy in the s:/OIS/webposting folder. c. Email DCA Internet Team a request to post to BPPE website. d. Follow-up in one week if document is not posted to the BPPE website.</p>	<p>Office Technician</p>

Title: <i>Stipulated Settlement Agreement</i>	Supersedes: May 20, 2013	Procedure #: 2013-0041
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 5
Issue Date: February 20, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

1. *Obtaining an approval to operate by fraud.*
2. *A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: *This procedure documents the process for the Stipulated Settlement Agreement to ensure consistent results. Prior to the scheduled administrative hearing date, the DAG notifies the Bureau if the respondent wishes to settle the matter out of court or if the DAG recommends settlement.*

If the Bureau determines the case is appropriate for settlement, the DAG prepares a stipulated agreement pursuant to the terms and conditions authorized by the Bureau.



Bureau for Private Postsecondary Education Procedure

The Bureau can agree to a stipulated surrender or a stipulated revocation of an approval to operate.

The stipulation is signed by the respondent and DAG. The DAG prepares a cover letter that supports adopting the stipulation and submits both documents to the Bureau for DCA consideration.

Productivity Benchmarks: The time spent preparing a stipulated settlement agreement will vary depending on factors involved with the case; however, the Discipline Analyst, on average, will spend approximately two hours working on a stipulated settlement agreement.

Definitions:

The Discipline Analyst is responsible for preparing and monitoring cases sent to the Office of the Attorney General (AG).

Material violations include, but are not limited to, misrepresentation, fraud in the inducement of a contract, and false or misleading claims or advertising, upon which a student reasonably relied in executing an enrollment agreement and that resulted in harm to the student.

Procedures:

Task	Who is Responsible
1. In determining whether the Bureau would be willing to settle a case, the Bureau takes into consideration multiple factors, including but not limited to the following: a. Nature and severity of the act(s), offense(s), or crime(s) under consideration. b. Actual or potential harm to any consumer, student, or the general public. c. Prior record of discipline, citations, or notices to comply.	Management Team

<ul style="list-style-type: none"> d. Number and/or variety of current violations. e. Mitigation and aggravation evidence. f. Rehabilitation evidence. g. In the case of a criminal conviction, compliance with terms of sentence and/or court ordered probation. h. Overall criminal record. i. Time passed since the act(s) or offense (s) occurred. j. Whether or not the respondent cooperated with the Bureau's investigation, other law enforcement or regulatory agencies, and/or the injured parties. k. Recognition by respondent of its wrongdoing and demonstration of corrective action to prevent recurrence 	
<p>2. Other factors to consider when determining whether to settle a case are:</p> <ul style="list-style-type: none"> a. The Bureau's case is weak if it were to go to hearing, with the potential of case dismissal. This might occur due to: <ul style="list-style-type: none"> 1. Case aging 2. Weak evidence 3. Lack of witnesses or poor witnesses 4. Strong mitigating evidence that supports the Respondent's rehabilitation claim or defense 5. The case doesn't warrant outright revocation, or it won't get revocation if it goes to hearing. 	<p>Discipline Analyst Management Team</p>
<p>3. Typically, the Bureau will not consider a stipulated settlement in the following instances, unless it is a stipulated surrender of licensure:</p>	<p>Discipline Analyst Management Team</p>

<ul style="list-style-type: none">a. Ongoing consumer harm involvedb. Respondent is a danger to the publicc. Fraudulent activity involving consumer harm or personal financial gain	
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Bureau for Private Postsecondary Education Procedure

Title: Working with the AG's Office	Supersedes: May 20, 2013	Procedure #: 2013-0042
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 6
Issue Date: February 20, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

1. *Obtaining an approval to operate by fraud.*
2. *A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: *This procedure documents the process for working with the AG's office to ensure consistent results. Once the case is forwarded to the AG's office, they will be representing the Bureau in the case. There will be no further contact between the Bureau and the institution owner and/or complainant. All questions and concerns should be forwarded to the assigned DAG.*



Bureau for Private Postsecondary Education Procedure

The following legal pleadings are typically used during the Bureau's disciplinary process:

<i>Legal Pleading</i>	<i>Prepared by</i>	<i>Signed by</i>
<i>Accusation</i>	<i>DAG</i>	<i>Bureau Chief</i>
<i>Statement of Issues</i>	<i>DAG</i>	<i>Bureau Chief</i>
<i>Default Decision and Order</i>	<i>DAG</i>	<i>DCA Director</i>
<i>Stipulated Agreement</i>	<i>DAG</i>	<i>DCA Director</i>
<i>Proposed Decision</i>	<i>Administrative Law Judge</i>	<i>Administrative Law Judge</i>
<i>Decision and Order</i>	<i>DAG</i>	<i>DCA Director</i>

After the DAG has prepared the legal pleading and it has been signed by the Bureau Chief, the DAG serves/-mails it on the respondent.

The DAG also sends a copy of all served documents to the Discipline Analyst who then files the documents and has them posted to the Bureau website

Productivity Benchmarks: The time spent working with the AG's office will vary depending on the length of the case, amount of communication with the AG's office, and length of the pleading; however, the Discipline Analyst, on average, will spend approximately eight (8) hours working with the AG's office on one case.

Definitions:

The Discipline Analyst is responsible for preparing and monitoring cases sent to the Office of the Attorney General (AG).



Bureau for Private Postsecondary Education Procedure

Material violations include, but are not limited to, misrepresentation, fraud in the inducement of a contract, and false or misleading claims or advertising, upon which a student reasonably relied in executing an enrollment agreement and that resulted in harm to the student.

Notice of Defense and Request for Hearing - According to section 11506 of the APA, the respondent has **15 days** from the date of service to file a Notice of Defense (NOD) and request for hearing.

If the respondent files a timely NOD, the DAG submits a hearing request to the Office of Administrative Hearings (OAH) to obtain a hearing date. This process can take up to **30 days** and hearings are typically scheduled **6 – 12 months** in advance.

The DAG will notify the Bureau with the OAH hearing date. [APA section 11506 (a)]

The Discipline Analyst should continue to monitor this process to make sure the hearing has been scheduled.

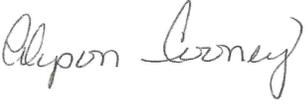
Default Decision - If the respondent does not send a NOD, the DAG submits a Default Decision to the Bureau for the Director of the Department of Consumer Affairs (DCA) consideration. A Default Decision is processed by the Discipline Analyst in the same manner as a proposed decision.

Procedures:

Task	Who is Responsible
1. After the SDAG receives the AG Transmittal Memorandum from the Bureau, he/she assigns the case to a DAG. If, after 30 days , the Bureau has not received DAG assignment notification, contact the SDAG and request who has been assigned to the case.	Deputy Attorney General Discipline Analyst
2. When you receive the assigned DAG's contact information, call or email to introduce yourself and politely ask when the Bureau can expect a draft legal	Discipline Analyst

<p>2. Place one copy in the Decision and Orders binder.</p> <p>b. Update all tracking logs.</p>	<p>Office Technician</p>
<p>8. Email a scanned copy of the legal pleading to the DCA Internet Team to have the document posted to the website.</p> <p>a. Scan legal pleading and email it to yourself.</p> <p>b. save a copy of legal pleading in the s:\ois\webposting folder</p> <p>c. Email Internet Team to have legal pleading posted to the BPPE website</p> <p>d. Follow-up in one week if document is not posted.</p> <p>Types of Disciplinary Actions on the BPPE Website</p> <ol style="list-style-type: none"> 1. Accusations 2. Amended Accusations 3. Statement of Issues 4. Citations 5. Decisions and Orders 	<p>Office Technician</p>
<p>9. a. If the legal pleading is an accusation, the respondent must file a Notice of Defense (NOD) within 30 days after being served.</p> <ol style="list-style-type: none"> 1. If a NOD is not received the DAG will prepare a default decision. 2. If a NOD is received, the DAG will coordinate and request an administrative hearing. The DAG will notify the Respondent and Bureau of Administrative Hearing date. <p>b. If legal pleading is a Statement of Issues:</p> <ol style="list-style-type: none"> 1. Approximately 30 days after SOI is served, the DAG will request an administrative hearing date. 2. The DAG will notify the Respondent and Bureau of the hearing date. 	<p>Discipline Analyst</p>

<p>3. The Respondent can submit additional applications documents that will be reviewed by licensing (see licensing procedures).</p>	
<p>10. Case Monitoring a. Update all tracking logs and calendars with dates to monitor case. b. Document all correspondence (emails, mail and telephone calls).</p>	<p>Discipline Analyst</p>
<p>11. Process additional related complaint cases</p> <p><i>Note: Additional complaint cases that are related to the case that have been referred to the AG are assigned to the Discipline Analyst.</i> If it is a related complaint, send a copy of the complaint to the DAG.</p>	<p>Discipline Analyst</p>
<p>10. Send the Complainant a closing letter. Close the related complaint case in SAIL and update all tracking logs.</p> <p><i>Note: Be sure to document all actions taken and all communication with the DAG in the tracking systems and update the calendar with follow up dates.</i></p>	<p>Discipline Analyst</p>

Title: Additional Application Documents Submitted by Institution after Denial	Supersedes: May 20, 2013	Procedure #: 2013-0043
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 4
Issue Date: February 20, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

1. *Obtaining an approval to operate by fraud.*
2. *A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: The Discipline Analyst is the primary point of contact for cases involving the appeal of a denial of an initial or a renewal licensing application. The Analyst will work directly with the institution, the Office of the Attorney General and the Licensing Unit.

After a denial is issued and appealed, if an institution submits additional application information and documentation to address deficiencies outlined in the denial letter, the

Discipline Analyst will work with the Licensing Unit to determine if the additional documents and/or information bring the institution into compliance.

Productivity Benchmarks: The time spent reviewing additional documents submitted after the denial will vary depending on the factors involved with the case; however, the Discipline Analyst, on average, will spend approximately two hours working on reviewing the documentation received and preparing the case to send to the licensing unit.

Procedures:

Task	Who is Responsible
1. Forward additional application documents to Licensing Unit Manager or assigned analyst for review.	Discipline Analyst
2. If the additional documents bring the institution into compliance: <ul style="list-style-type: none"> A. Inform the Deputy Attorney General and withdraw the case. B. Licensing withdraws the denial and issues an approval to operate. 	Discipline Analyst Deputy Attorney General BPPE Management
5. If the additional documents do not bring the institution into compliance: <ul style="list-style-type: none"> A. Inform the institution that the resubmission did not clear causes for denial. B. Update the Deputy Attorney General of any causes for denial that were cleared. C. The Deputy Attorney General and BPPE Management decide if a new Statement of Issues (SOI) is necessary. 	Discipline Analyst Licensing Unit Deputy Attorney General BPPE Management
6. If the additional documents clears some of the original causes but creates new causes for denial: <ul style="list-style-type: none"> A. With manager approval, inform the institution that the 	Discipline Analyst Licensing Unit

<p>resubmission did not clear causes for denial.</p> <p>B. Update the Deputy Attorney General on cleared and new causes for denial.</p> <p>C. Sends an email to inform licensing, Enforcement, and Chief of new causes for denial.</p> <p>D. The Deputy Attorney General and BPPE management decide if a new SOI is necessary and/or if institution will be informed in writing prior to issuance of new SOI of new causes for denial.</p>	<p>Deputy Attorney General</p> <p>BPPE Management</p>
<p>7. If the additional documents submitted change the causes for denial:</p> <p>A. With manager approval, inform the institution and send a list of new causes of denial.</p> <p>B. Notify the Deputy Attorney General of new causes for denial.</p> <p>C. Send an email to Licensing Manager, Deputy Chief, and Bureau Chief (copied to Enforcement Manager and Discipline Unit Manager) that the original causes for denial have been cleared but that the submission creates new causes for denial, and the Deputy Attorney General/Institution have been notified.</p> <p>D. Bureau Chief, Deputy Bureau Chief, and Licensing Manager may decide, depending on what new causes are, to withdraw the SOI and work with the institution to achieve compliance.</p>	<p>Discipline Analyst</p> <p>Licensing Unit</p> <p>Deputy Attorney General</p> <p>BPPE Management</p>
<p>8. If the institution requests information from the Discipline Analyst regarding the status of the resubmission, the Analyst may inform the institution that the case is moving to appeal because the documents submitted do not address all</p>	<p>Discipline Analyst</p>

deficiencies identified in the denial letter.

The Institution is not entitled to additional deficiency letters or notifications from the Discipline Analyst.

Title: Collection of Citation Fine or Cost Recovery	Supersedes: May 3, 2013	Procedure #: 2013-0056
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 4
Issue Date: March 9, 2015	Approved By: Joanne Wenzel, Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) provides that as a consequence of an investigation and upon a finding that an institution has committed a violation of the Act or its associated regulations the Bureau has the authority to issue a citation to the institution that contains an order of abatement and/or a monetary fine. The fine shall not be less than \$50 or exceed \$500 for each violation except for instances of unlicensed activity where a fine can be assessed up to \$50,000. In addition, the Bureau may seek the recovery of costs related to an investigation.*

Purpose: *This procedure outlines the process for collecting fees for unpaid citation orders and cost recovery.*

Definitions:

Approval to Operate: *the authorization to offer to the public and to provide postsecondary educational programs*

Bureau for Private Postsecondary Education Procedure

Approved to Operate: an institution has received authorization to offer postsecondary educational programs to the public.

Institution: any private postsecondary educational school, including its branch campuses and satellite locations.

Owner: an individual in the case of a sole proprietorship, partners in a partnership, members in limited liability company, or shareholders in a corporation.

Ownership: legal or equitable interest in an institution, including ownership of assets or stock

Postsecondary education: a formal institutional educational program whose curriculum is designed primarily for students who have completed or terminated their secondary education or are beyond the compulsory age of secondary education, including programs whose purpose is academic, vocational, or continuing professional education

Private Postsecondary Educational Institution: a private entity with a physical presence in this state that offers postsecondary education to the public for an institutional charge.

Offer to the Public: advertise, publicize, solicit or recruit

Operate: establish, keep, or maintain any facility or location in this state where, or from which or through which, postsecondary educational programs are provided.

Bureau for Private Postsecondary Education Procedure

Collection of Citation Fine or Cost Recovery Funds

The Franchise Tax Board (FTB) has an interagency intercept collections program to intercept or offset FTB refunds, California State Lottery winnings, or unclaimed property funds from individuals who have outstanding debts owed to the State of California.

The Department of Consumer Affairs (DCA) Accounts Receivable-Revenue Unit Liaison processes the Bureau's FTB intercept collections.

Procedure

1. To collect a debt from FTB the Bureau must have the following:
 - a. The debtors SSN
 - b. The debt amount is at least \$10
 - c. The debtor has not filed bankruptcy
 - d. A Pre-Intercept notice (usually 3rd letter) has been mailed and the appropriate response time has elapsed.
 - e. In Post-Judgment liability cases, it is not required to send out 3 letters. However, sending a pre-intercept notice to all debtors reduces debtor contacts that occur after intercepts, and you may increase voluntary payments.

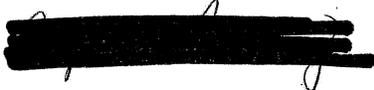
2. Analyst mails the debtor 3 payment letters at 30 day intervals
 - a. If a reply or payment is not received within 30 days after sending the first letter, send a second letter referencing the original request for payment letter and stated in a stronger tone.
 - b. If a response is still not received from the debtor, send a third letter 30 days later. This last letter, also known as the Pre-Intercept Notice, will include references to prior letters and will state what further actions may be taken in the collection process.
 - c. The Pre-Intercept notice should be identical or substantially similar to this:

Our records show that you have a \$ _____ delinquent debt due to the _____ Agency/College _____. You have 30 days to voluntarily pay this amount before we submit your account to the Franchise Tax Board (FTB) for interagency intercept collections. FTB operates an intercept program in conjunction with the State Controller's Office, collecting delinquent liabilities individuals owe to state and local agencies/colleges. FTB intercepts tax refunds, Unclaimed Property (UPD)* claims, and lottery winnings owed to individuals. FTB redirects these funds to pay the individual's debts to the agencies/colleges (California Government Code Sections 12419.2, 12419.7, 12419.9, 12419.10, 12419.11, and 12419.12).

Bureau for Private Postsecondary Education Procedure

If you have questions or do not believe you owe this debt, contact us within 30 days from the date of this letter. A representative will review your questions/objections. If you do not contact us within that time, or if you do not provide sufficient objections, we will proceed with intercept collections.

3. If payment has not been received after the Pre-Intercept Notice, the Analyst submits a Citation or Cost Recovery form to the DCA Accounts Receivable Liaison.
 - a. Forms: <http://inside.dca.ca.gov/office/acc/accounting/receivables.html>
 - b. Once the Liaison receives the form, she will assign the FTB Account Number and submit the account to FTB for collection.
4. The Analyst tracks the referral in the FTB tracking log located at:
[\\ADPPE-ENFORCEMENT\DTL\Lin Liaison\FTB Collections\FTB\FTB Tracking Log](#)
5. The Analyst will fill out a tracking sheet located at:
[...\\ADPPE-ENFORCEMENT\Discipline Unit\FTB Collections\FTB Tracking Sheet\FTB Tracking Sheet Template](#) and save the document to the FTB file.
6. The Analyst will then close the case in SAIL and place a printed copy of the tracking sheet in the FTB tracking binder located at the Citation Analysts Desk. The Analyst will track any and all payments received from FTB.
7. If there are any partial or full payments received by the Bureau, the Analyst must notify the Liaison immediately by submitting an Add//Delete/Change form.
8. The Liaison will notify the Analyst of collections by sending a "Notice of Collection" as they are intercepted and collected by FTB.

Title: Emergency Decision Procedures	Supersedes: None	Procedure #: 2015-0004
Procedure Owner: Discipline Unit	Effective: Immediately	Page: 2 of 16
Issue Date: February 23, 2015	Approved By:   Deputy Bureau Chief Bureau for Private Postsecondary Education	

Purpose:

This procedure documents the process for preparing the emergency decision to ensure consistent results.

An emergency decision is a legal pleading seeking temporary, interim relief in the form of ceasing enrollment of new students, ceasing part or all instruction for some or all programs, and/or ceasing collection of tuition or fees for some or all programs.

An accusation is a legal pleading that states the charges against the respondent and the Bureau's authority to take action. The DAG drafts the Accusation and forwards it to the Bureau for the Bureau Chief's signature. Once signed, the DAG serves/-mails the Accusation on the respondent.

The AG Transmittal Memorandum is sent to the Supervising Deputy Attorney General (SDAG) in one of the five AG field offices throughout the state, according to the area in which the violation(s) occurred. The AG field offices are located in Los Angeles, Oakland, Sacramento, San Diego, and San Francisco.

Typically, the transmittal requests the preparation of a legal pleading that specifies the charges against the respondent (licensee or applicant). The legal pleading prepared is an emergency decision followed by an accusation.

Time Frame:

Within 2 days (48 hours) of the issuance of an emergency decision it becomes effective.

Within the 2 days (48 hours) the school owner has the right to be heard before the Director of the Department of Consumer Affairs (DCA).

- The Bureau must give prior notice to the Director so that he or his designee will be available for the hearing

If there is a hearing, the Director makes the decision as whether or not to move forward with the emergency decision.

If there is no hearing, or the Director decides to move forward with the emergency decision, the Bureau has 10 days to file an accusation with the Attorney General’s Office that includes all of the charges and allegations in the emergency decision.

Productivity Benchmarks: The time spent working on an emergency decision will vary depending on the factors involved with the case; however, the Discipline Analyst, on average, will spend approximately four hours working on an emergency decision.

Procedures:

Task	Who is Responsible
<p>1. In determining whether the Bureau would make an emergency decision for temporary, interim relief, the Bureau takes into consideration multiple factors, including but not limited to the following:</p> <ul style="list-style-type: none"> • Immediate danger to the public health, safety, or welfare that requires immediate action to protect students, prevent misrepresentations to the public, or prevent the loss of public funds or monies paid by students, including but not limited to fraud; a substantial misrepresentation in the institution's Performance Fact Sheet, school catalog, or enrollment agreement • A substantial failure to meet institutional minimum operating standards • A substantial failure to obtain a necessary approval or permit from another agency or regulatory body, affecting public health, safety or 	<p>Discipline Analyst</p>

welfare	
<p>2. Create an open case in SAIL (see "OT Discipline Process Procedures" BPPF Approve Discipline Enforcement Discipline Office Technician 0152015-0007 OT Discipline Process Procedure.docx)</p>	Office Technician
<p>3. The Bureau may order temporary, interim relief, in the form of some or all of the following measures:</p> <ul style="list-style-type: none"> • Cease enrollment of new students • Cease part or all instruction for some or all programs • Cease collection of tuition or fees for some or all programs 	Discipline Analyst
<p>4. Draft the Emergency Decision for the Chief's signature (see ATTACHMENT A BPPF Approve Discipline Enforcement Discipline Unit Templates Emergency Decision Attachment A.docx.)</p> <p><i>Serve notice of an emergency decision to the owner, person who owns or controls 25% or more of the stock or an interest in the institution, each general partner, officer, corporate director, member of the board of directors and any other person who exercise substantial control over the institution's management or policies, and the agent for services or process.</i></p> <ul style="list-style-type: none"> • Insert Institution Name • Insert Owner Name • Location of Institution (Address) • Institution Code Number • Any, of all, of the following that the institution is ordered to do: <ul style="list-style-type: none"> ○ Cease enrollment of new students in all of the institutions programs ○ Cease all instruction for all of the institutions programs ○ Cease collection of tuition and fees for all of the institutions programs • Specifically state what violations were found • Include the manner in which the person may request an opportunity to be heard before the Director, or his or her designee, prior to the effective date of the emergency decision • Include the institutions right to judicial review of the decision 	Discipline Analyst

Title: Injunctive Relief	Supersedes: None	Procedure #: 2015-0005
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 3
Issue Date: February 25, 2015	Approved By:   Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy:

The bureau may bring an action for equitable relief. The equitable relief may include:

- *Restitution;*
- *A temporary restraining order;*
- *The appointment of a receiver;*
- *A preliminary or permanent injunction.*

The action may be brought in the county in which the defendant resides or in which any violation has occurred or may occur.

The remedies provided in this section supplement, and do not supplant, the remedies and penalties under other provisions of law.

Purpose:

This procedure documents the process for preparing the injunctive relief to ensure consistent results.

An injunctive relief is an equitable remedy in the form of a court order that compels a party to do or refrain from specific acts.

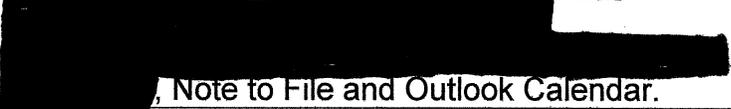
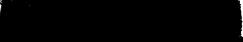
An accusation is a legal pleading that states the charges against the respondent and the Bureau's authority to take action. The DAG drafts the Accusation and forwards it to the Bureau for the Bureau Chief's signature. Once signed, the DAG serves/mailes the Accusation on the respondent.

Typically, the transmittal requests the preparation of a legal pleading that specifies the charges against the respondent (licensee or applicant). The legal pleading prepared is an injunctive relief followed by an accusation.

Productivity Benchmarks: *The time spent working on an injunctive relief will vary depending on the factors involved and the size of the case; however, the Discipline Analyst, on average, will spend approximately two hours working on an injunctive relief.*

Procedures:

Task	Who is Responsible
1. Review the file and discipline referral worksheet to determine the violations found.	Discipline Analyst
2. Create an open case in SAIL (see "OT Discipline Process Procedures" [REDACTED])	Office Technician
3. Create a memo to the Deputy Attorney General (DAG) Liaison (See Attachment A G:\BPPE\BPPE ENFORCEMENT\Discipline Unit\Templates [REDACTED]) <ul style="list-style-type: none"> • Be sure to include a copy of the following: <ul style="list-style-type: none"> ○ Investigation report ○ Evidence (i.e. reports, records, etc.) 	Discipline Analyst
4. After receiving the decision from the DAG liaison that the Bureau can move forward with an injunction relief the analyst prepares the transmittal.	Discipline Analyst
5. Prepare the injunctive relief transmittal (see Attachment B [REDACTED]) <ul style="list-style-type: none"> • Be sure to include the following: <ul style="list-style-type: none"> ○ DATE ○ APPROPRIATE FIELD OFFICE ○ TO:INSERT DEPUTY ATTORNEY 	Discipline Analyst

<p>GENERAL NAME</p> <ul style="list-style-type: none"> ○ FROM:INSERT ENFORCEMENT CHIEF NAME ○ BUREAU CASE NO. ○ SUBJECT ○ INSTITUTION NAME ○ CAUSE FOR INJUNCTIVE RELIEF ○ APPLICABLE/RELATED STATUTORY SECTIONS ○ ATTACHMENTS ○ 	
<p>6. Review the file to confirm who the owner(s) of the school are and that the information accurately matches SAIL.</p>	<p>Discipline Analyst</p>
<p>7. Review the allegations on the discipline referral worksheet and add any other appropriate regulations.</p>	<p>Discipline Analyst</p>
<p>8. Send package certified mail.</p> <ul style="list-style-type: none"> ○ In the "Sender" section of the PS Form 3811 (green card), stamp the Bureau's address and write your name at the bottom of the card. ○ In the "Article Addressed to" section 1 on the other side of the green card, write the appropriate SDAG's address. <ul style="list-style-type: none"> ● Place certified mail number from PS Form 3800 in the "Article Number" section 2 of the green card. ● In section 3 of the green card check the "Certified Mail & Return Receipt for Merchandise" boxes of the green card. 	<p>Office Technician</p>
<p>9. Fill in the Administrative Hearing Checklist (sheet on outside of the case file).</p>	<p>Discipline Analyst</p>
<p>10. Update SAIL, AG Log  , Note to File and Outlook Calendar.</p>	<p>Discipline Analyst</p>
<p>11. The DAG will contact the Bureau to obtain a signed "Declaration in Support of Application for Preliminary Injunction".</p>	<p>Discipline Analyst</p>
<p>12. Prepare the letter that will be sent to the DAG (see Attachment C  </p> <ul style="list-style-type: none"> ● Be sure to include the "Declaration in Support of 	<p>Discipline Analyst</p>

Application for Preliminary Injunction” with the letter	
13. Prepare the AG Transmittal Memorandum per the “Preparing the AG Transmittal Memo” procedures 	Discipline Analyst
14. Update SAIL, AG Log (see link above), Note to File, and Outlook Calendar.	Discipline Analyst



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



MEMORANDUM

DATE: INSERT DATE

TO: INSERT DAG LIASION NAME
Deputy Attorney General
Attorney General's Office

FROM: INSERT DISCIPLINE MANAGER NAME
INSERT PHONE NUMBER

BUREAU CASE NO.: INSERT BUREAU CASE NUMBER

SUBJECT: INSERT INSTITUTION NAME

AG Field Office

- Sacramento
- San Francisco
- Los Angeles
- San Diego

Attached, for your review, is the Investigation and Supplemental Report regarding INSERT INSITUTION NAME. After your review we need to discuss next steps.

You may contact INSERT INVESTIGATOR NAME at (916) INSERT PHONE NUMBER or INSERT EMAIL ADDRESS for questions regarding the investigation.

Attachment A



ATTORNEY GENERAL TRANSMITTAL MEMORANDUM

DATE: INSERT DATE
APPROPROIATE

AG Field Office
 INSERT

TO: INSERT DEPUTY ATTORNEY GENERAL NAME
INSERT DEPUTY ATTORNEY GENERAL ADDRESS

FROM: INSERT ENFORCEMENT CHIEF NAME
Enforcement Chief
INSERT PHONE NUMBER

BUREAU CASE NO.: INSERT CASE NO.

SUBJECT: INSERT OWNER NAME

INSERT INSTITUTION NAME
INSERT INSTITUTION ADDRESS
INSERT INSTITUTION PHONE NUMBER

The Bureau for Private Postsecondary Education (Bureau) requests to file a complaint for injunctive relief against INSERT INSTITUTION NAME based on California Education Code (CEC) AND/OR CALIFORNIA CODE OF REGULATIONS §INSERT CODE(S).

The Bureau has established that INSERT INSTITUTION NAME has been INSERT WHAT HAS BEEN FOUND (EXAMPLE: operating without Bureau approval and continues to maintain an internet website for the solicitation and registration of students. The "institution" has also obtained approval through the U.S. Department of Homeland Security to offer VISAs and has been certified through the Student and Exchange Visitor Program to accept international students).

The applicable/related statutory section(s) is/are:
CEC §INSERT VIOLATIONS

Attachments
INSERT ATTACHMENTS

Please contact me if you have any questions.
Attachments

ATTACHMENT B



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INSERT DATE

INSERT DEPUTY ATTORNEY GENERAL NAME

Deputy Attorney General

INSERT DEPUTY ATTORNEY GENERAL ADDRESS

Re: **INSERT INSTITUTION NAME**

Enclosed is the "Declaration of **INSERT BUREAU CHIEF NAME** in Support of Application for Preliminary Injunction".

A facsimile of the same was sent on **INSERT DATE SENT**.

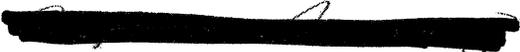
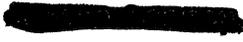
If further information or documentation is required please let us know.

Thank you.

INSERT ENFORCEMENT CHIEF NAME

Enforcement Chief

ATTACHMENT C

Title: Case Intake and Input (Office Technician Duties)	Supersedes: May 20, 2013	Procedure #: 2015-0007
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 3
Issue Date: February 20, 2015	Approved By:   Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

1. *Obtaining an approval to operate by fraud.*
2. *A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: *The Complaints and Investigations Unit Manager gives the case to the Office Technician (OT) to open a complaint in Schools Automated Information Link (SAIL) Database (if the case does not already have a case number), assign the case to the Discipline Analyst, and prepare the discipline file.*

If the Bureau receives additional complaints concerning the school, the Complaints Investigations Unit Manager will determine if the complaint is related to the case that has been forwarded to the Deputy Attorney General (DAG) or if the case should be investigated.

If the complaint is related to the case that has been sent to the Attorney General (AG), the Discipline Analyst should send a copy of the complaint to the Deputy Attorney General (DAG) and close the complaint case in SAIL.

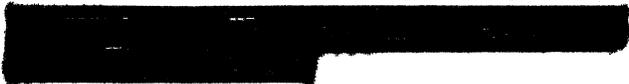
Productivity Benchmarks: *The time spent for the Office Technician to create a file and process a Discipline Referral, on average, will take approximately one hour*

Procedures:

Task	Who is Responsible
Create Case File	
<ol style="list-style-type: none"> 1. Discipline Referrals received from the Administration Unit, Compliance Unit, Education Specialist Unit, Licensing Unit or BPPE Management 2. Fill in the following information in SAIL under Enforcement/Complaints, you will need to Add an Enforcement File Manually <ul style="list-style-type: none"> • Complainant Information: First Name: BPPE; Last Name: Enforcement • Current (assigned) Staff: choose the name of the Discipline Analyst • Enforcement File Type: choose "Enforcement" • Fill out the remaining sections in SAIL 	Office Technician
<ol style="list-style-type: none"> 3. Create blue page inserts entitled Discipline Referral, Note to File, AG Transmittal, Correspondence, and Evidence 	Office Technician
<ol style="list-style-type: none"> 4. On the Discipline Referral blue page put the following information: <ol style="list-style-type: none"> a. Discipline Received Date: b. Referred From: (Unit Name, Person Referring) c. Complaint/Case No.: 	Office Technician
<ol style="list-style-type: none"> 5. Create a Case File Label with the following information: <ol style="list-style-type: none"> a. Schools name on top of the label b. Institution code or UA (unapproved) on the bottom left corner of label c. SAIL case number on the right bottom corner of label <p>Place the case file label on the bottom right corner</p>	Office Technician
<ol style="list-style-type: none"> 6. On the outside of the file folder: <ol style="list-style-type: none"> d. Staple the Administrative Hearing Checklist 	Office Technician

form onto the folder	
7. On the inside of the folder: e. Left side: Place a Note to File blue paper hole punched in the prongs and Quick View Report f. Right side: Place the Discipline Referral blue page hole punched in the prongs	Office Technician
g. The remaining blue page inserts: AG Transmittal, Correspondence, and Evidence can be placed in the file, hole punched in the prongs.	Office Technician

Input Case Information In Tracking Log

1. Open the AG Case Aging Log which is located in: 	Office Technician
a. Click on the Open AG Cases tab located at the bottom of the document	Office Technician
2. Input the following information: a. #: Status of the case: 1=Open b. Date Rec'd: (Enter the date the Discipline Unit received this referral) c. Staff Assigned d. Case Number e. School: (input entire school name) 3. School #: (input institution code) a. The Discipline Analyst will be responsible for inputting the information in the remaining cells.	Office Technician

Title: Case Closure	Supersedes: May 20, 2013	Procedure #: 2015-0014
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 2
Issue Date: February 20, 2015	Approved By:   Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

1. *Obtaining an approval to operate by fraud.*
2. *A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: *This procedure documents the process for Case Closure to ensure consistent results. On the effective date, the Decision and Order is public information and should be posted to the Bureau's website and the Department of Consumer Affairs (DCA) should have a press release.*

After the effective date, the institution's approval to operate will be revoked and the owner will be required to comply with the Decision and Order, including payment of restitution and/or cost recovery

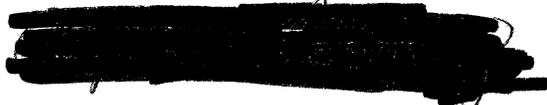
Definitions:

The Discipline Analyst is responsible for preparing and monitoring cases sent to the Office of the Attorney General (AG).

Productivity Benchmarks: *The time spent for the Office Technician to close a Discipline Case will take one hour.*

Procedures:

Task	Who is Responsible
<p>1. If the file is closed as withdrawn or approved:</p> <ul style="list-style-type: none">• Make copies of the Denial Letter, Statement of Issues, and withdrawal letter or Notice of Withdrawal• Create memo to Licensing Manager • Return denied application file to Licensing Manager• E-mail Closed Schools Unit with the institution code, institution name, denial date, and withdrawn or approved date.	<p>Office Technician</p> <p>Discipline Analyst</p>
<p>2. File the case in the closed case enforcement cabinet</p>	<p>Office Technician</p>

Title: Citation Intake	Supersedes: July 8, 2013 Amended February 1, 2014	Procedure #: 2015-0015
Procedure Owner: Enforcement Unit	Effective: Immediately	Page: 1 of 6
Issue Date: February 25, 2015	Approved By:   Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Bureau for Private Postsecondary Education (Bureau) has authority to issue citations containing orders of administrative fines, abatement, and/or restitution (Citation) against persons who have proper approval to operate a private, postsecondary institution (institution) and persons who do not have approval to operate an institution. (See Business and Professions (B&P) Code §§ 125.9, 148; Private Postsecondary Education Act of 2009 (The Act) §§ 94936, 94941, 94944; and Title 5 of the California Code of Regulations (BPPE Regulations) §§ 75020, 75030).

Purpose: A Citation is issued when an institution fails to comply with a Notice to Comply or it is found that an institution committed a violation of the Act or Bureau regulations (The Act § 94936(a)). The Bureau will base its assessment of the administrative fine on: the nature and seriousness of the violation; the persistence of the violation; the good faith of the institution; the history of previous violations; the purposes of the Act and Bureau regulations; and the potential harm to the students. (The Act § 94936(b)(2)(A-F)). The amount of the administrative fine varies. (See Guide to Assessment of Administrative Fines in Cite and Fine attachment folder.) Failure to comply with a citation order may result in disciplinary action (BPPE Regulations § 75020(c)(4)).

Citation(s) constitute a public record of the action taken and are posted on the Bureau's web site.

Definitions: The Discipline Unit has a designated analyst (citation analyst) who, among other assignments, performs the duties related to the Citation Program. Enforcement Referrals for issuing a Citation are received from the Complaint Investigations Unit, the Compliance

Inspections Unit, the Administration Unit, the Licensing Unit, Education Specialist Unit and Bureau Management.

The Complaint Investigations Unit analysts are responsible for reviewing complaints, investigating unapproved institutions and expired approvals, researching applicable laws, and obtaining the necessary evidence that demonstrates a violation. When referring a case for issuance of a Citation, the case file and evidence that supports the alleged violation(s) must be included with the Citation Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval.

The Compliance Inspections Unit analysts are responsible for obtaining the necessary evidence that demonstrate continued non-compliance with minor violations listed on an issued Notice to Comply (NTC) and/or material violation(s). Compliance can be obtained with minor violations 30 days from when the NTC was issued. Institutions are not given the opportunity to obtain compliance with material violation(s). When referring a case for issuance of a Citation, the case file and evidence that supports the continued non-compliance or a material violation(s) must be included with the Enforcement Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval.

The Administration Unit, the Licensing Unit, the Education Specialist Unit, and Bureau Management are responsible for researching applicable laws, and obtaining the necessary evidence that demonstrate a violation. When referring a case for issuance of a Citation, evidence that supports the alleged violation(s) must be attached to the Enforcement Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval unless referral is directly from Bureau management.

Citation Order Package-

- 1) Citation: Assessment of Fine and/or Order of Abatement and/or Order of Restitution;
- 2) Applicable Laws Violated;
- 3) Statement of Rights: Appeal Process Information Sheet;
- 4) Notice of Appeal of Citation – Request for Informal Conference and/or Administrative Hearing;
- 5) Payment of Fine – Waiver of Appeal Rights;

Citation Program Committee – The Committee consists of the Bureau Chief, Deputy Bureau Chief, Enforcement Chief, Discipline Manager, Citation Analyst, and a Compliance Analyst. The Committee meets monthly to review violation(s) and supporting evidence in each Enforcement Referral and unanimously agrees upon an assessment of fine, an order of abatement and restitution, if any.

Orders of Abatement

An order of abatement may require an institution to demonstrate how future compliance with the Act and Bureau regulations will be accomplished (The Act § 94936(b)(1)).

An order of abatement against a person operating a private postsecondary institution without proper approval may order that person to cease operations of the institution. Additionally, the BPPE may require the unapproved institution to cease any unlawful advertising and order the telephone company to disconnect the telephone services furnished to any telephone number(s) contained in the unlawful advertising. (BPPE Regulations § 75020(b); B&P § 149)

There is a monthly Citation Program Committee meeting held. The citation analyst will present the referred violated code section(s) with supporting evidence as well as the research obtained at the Citation Program Committee meeting. The Citation Program Committee will review the referred violated code section(s) and unanimously agree upon an order of abatement, an assessment of fine and or restitution, if any.

Productivity Benchmarks: The time spent opening a citation case is approximately 2 hours.

Procedures:

Task	Who is Responsible
<p>1. Opening a citation case in SAIL for Enforcement Referrals referred from the following units:</p> <ul style="list-style-type: none"> ✓ Administration ✓ Compliance ✓ Education Specialist ✓ Licensing ✓ BPPE Management <p>If referred from a unit not listed, refer to step 2 of these procedures.</p> <ol style="list-style-type: none"> a. Open SAIL b. Fill in the following information: <ul style="list-style-type: none"> • <u>Complainant Information:</u> <ul style="list-style-type: none"> ○ First Name: Input 'BPPE' ○ Last Name: Input Unit referred from • <u>Current Staff:</u> Input the name of the Citation Analyst • <u>Enforcement Type:</u> choose 'Enforcement' • Fill in the remaining sections in SAIL • Go into the comments section and leave comment stating "Enforcement Referral for Citation received [Enter Date]" c. Follow steps 3-5 	<p>Discipline Office Technician</p>

2. Transferring a citation case in SAIL for Enforcement Referrals referred from the following unit:

Discipline Office
Technician

✓ **Complaint Investigations**

a. Open SAIL

- Enter the SAIL case number
- Update the following information:
 - Current Staff: Input the name of the citation analyst
 - Enforcement Type: choose 'Enforcement'
- Go into the comments section and leave comment stating "Enforcement Referral for Citation received [Enter Date]"

b. Update the Complaints Case Aging Log

by doing the following:

- Delete the complaint off the Master tab
- Delete complaint off the previously assigned analyst's tab
- Go to the 'Transfer for Citation' tab located in the same log and input the following information:
 - #: Input the status of the case. You will put a '1'. (1 = open case, 0 = closed case)
 - Date Received: Enter the date the Bureau received the complaint, which is the same date as the received date in SAIL.
 - Staff Assigned: Enter the initials of the assigned analyst
 - Unit Referred From: A = Admin; CI = Complaint Investigations; C = Compliance; L = Licensing; ES = Education Specialist; BM = Bureau Management
 - Case No.: Enter the SAIL complaint number
 - School: Enter entire school name
 - School #: Enter the institution code
 - From: Enter the initials of the complaint analyst it was transferred from

c. Follow steps 3-5

3. Update the Citation Program Aging Log

Discipline Office
Technician

a. Open the Citation Program Aging Log

b. Click on the 'Citation Referral Intake Log' tab

c. Update the following cells:

Note: The information you will enter in the log will be contained on the enforcement referral

- #: Input the status of the case. You will put a '1'. (1 =

open case, 0 = closed case)

- Date Received: Enter the date the Bureau received the complaint, which is the same date as the received date in SAIL.
- Date Assigned: Enter the date it was transferred to the citation analyst which should be the same date it was transferred in SAIL by the Office Technician
- Staff Assigned: Enter the initials of the assigned analyst
- Unit Referred From: A = Admin; CI = Complaint Investigations; C = Compliance; L = Licensing; ES = Education Specialist; BM = Bureau Management
- NTC: put an "X" if this referral is from the compliance unit
- Case No.: Enter the SAIL complaint number
- School/Owner: Enter the entire school name and the owner
- School #: Enter the institution code

Note: The assigned Analyst will be responsible for inputting the information in the remaining cells not mentioned in this procedure.

4. Create Citation Case File

- a. Get a Yellow 'End Tab Fastener Folder'
- b. Update and Print on blue paper the Intake Sheet - Enforcement Referral template [REDACTED]
- Update the following information:
 - Received Date: Input the date it was transferred to the citation analyst
 - From: Input the unit it was referred from
 - Case No.: Input the SAIL case number
- Place the intake sheet on the inside-right side of the case file in the prongs
- c. Make a copy of the Citation Checklist [REDACTED] on green paper
 - Staple it to the front of the case file
- d. Print out on blue paper the Citation File Inserts [REDACTED]
 - Place the 'Note to File' insert on the inside-left side of the

Discipline Office Technician

<p>case file in the prongs, placing it behind the Activity Log</p> <ul style="list-style-type: none"> • Place the remaining inserts loosely in the citation file <p>e. Create a Case File Label (white sticker label)</p> <ul style="list-style-type: none"> • Input the following information on the label: <ul style="list-style-type: none"> ○ On the top of the label, enter the school's name ○ On the bottom left corner of label, enter Institution code or 'UA' for unapproved schools ○ On the right bottom corner of label enter SAIL case number • Place the label on the bottom right corner of the file folder <p>f. Place the Enforcement Referral, and any supporting documentation in the case file.</p>	
<p>5. Submit the Citation Case file containing the Enforcement Referral and the case file (if applicable) to the Citation analyst.</p>	<p>Discipline Office Technician</p>

Title: Review of Enforcement Referral for Citation	Supersedes: July 8, 2013 Amended February 1, 2014	Procedure #: 2015-0016
Procedure Owner: Enforcement Unit	Effective: Immediately	Page: 1 of 5
Issue Date: February 25, 2015	Approved By: [REDACTED] [REDACTED], Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Bureau for Private Postsecondary Education (Bureau) has authority to issue citations containing orders of administrative fines, abatement, and/or restitution (Citation) against persons who have proper approval to operate a private, postsecondary institution (institution) and persons who do not have approval to operate an institution. (See Business and Professions (B&P) Code §§ 125.9, 148; Private Postsecondary Education Act of 2009 (The Act) §§ 94936, 94941, 94944; and Title 5 of the California Code of Regulations (BPPE Regulations) §§ 75020, 75030).

Purpose: A Citation is issued when an institution fails to comply with a Notice to Comply or it is found that an institution committed a violation of the Act or Bureau regulations (The Act § 94936(a)). The Bureau will base its assessment of the administrative fine on: the nature and seriousness of the violation; the persistence of the violation; the good faith of the institution; the history of previous violations; the purposes of the Act and Bureau regulations; and the potential harm to the students. (The Act § 94936(b)(2)(A-F)). The amount of the administrative fine varies. Failure to comply with a citation order may result in disciplinary action (BPPE Regulations § 75020(c)(4)).

Citation(s) constitute a public record of the action taken and are posted on the Bureau's web site.

Definitions: The Complaint Investigations Unit analysts are responsible for reviewing complaints, investigating unapproved institutions and expired approvals, researching applicable laws, and obtaining the necessary evidence that demonstrates a violation. When referring a case for issuance of a Citation, the case file and evidence that supports the alleged violation(s) must be included with the Citation Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval.

The Compliance Inspections Unit analysts are responsible for obtaining the necessary evidence that demonstrate continued non-compliance with minor violations listed on an issued Notice to Comply (NTC) and/or material violation(s). Compliance can be obtained with minor violations

30 days from when the NTC was issued. Institutions are not given the opportunity to obtain compliance with material violation(s). When referring a case for issuance of a Citation, the case file and evidence that supports the continued non-compliance or a material violation(s) must be included with the Enforcement Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval.

The Administration Unit, the Licensing Unit, the Education Specialist Unit, and Bureau Management are responsible for researching applicable laws, and obtaining the necessary evidence that demonstrate a violation. When referring a case for issuance of a Citation, evidence that supports the alleged violation(s) must be attached to the Enforcement Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval unless referral is directly from Bureau management.

Citation Order Package-

- 1) Citation: Assessment of Fine and/or Order of Abatement and/or Order of Restitution;
- 2) Applicable Laws Violated;
- 3) Statement of Rights: Appeal Process Information Sheet;
- 4) Notice of Appeal of Citation – Request for Informal Conference and/or Administrative Hearing;
- 5) Payment of Fine – Waiver of Appeal Rights;

Citation Program Committee – The Committee consists of the Bureau Chief, Deputy Bureau Chief, Enforcement Chief, Discipline Manager, Citation Analyst, and a Compliance Analyst. The Committee meets monthly to review violation(s) and supporting evidence in each Enforcement Referral and unanimously agrees upon an assessment of fine, an order of abatement and restitution, if any.

Orders of Abatement

An order of abatement may require an institution to demonstrate how future compliance with the Act and Bureau regulations will be accomplished (The Act § 94936(b)(1)).

An order of abatement against a person operating a private postsecondary institution without proper approval may order that person to cease operations of the institution. Additionally, the BPPE may require the unapproved institution to cease any unlawful advertising and order the telephone company to disconnect the telephone services furnished to any telephone number(s) contained in the unlawful advertising. (BPPE Regulations § 75020(b); B&P § 149)

There is a monthly **Citation Program Committee** meeting held. The citation analyst will present the referred violated code section(s) with supporting evidence as well as the research obtained at the Citation Program Committee meeting. The Citation Program Committee will review the referred violated code section(s) and unanimously agree upon an order of abatement, an assessment of fine and or restitution, if any.

Productivity Benchmarks: The time spent reviewing an enforcement referral for citation and will vary greatly depending on how many violations the institution had and how many exhibits of evidence were needed; however, on average the Citation Analyst will spend approximately 32 hours reviewing enforcement referrals.

Procedures:

Task	Who is Responsible
1. Update the cell sections in the 'Citation Referral Intake Log' tab in the Citation Program Aging Log Tracking Logs And Statistics. [REDACTED] that the OT was not required to complete, as the information becomes available.	Citation Analyst
2. Update SAIL <ul style="list-style-type: none"> • If not already completed, complete the Allegations section. Choose the top three. • Click the 'Allegation Description' button and enter the all the alleged violations included on the enforcement referral 	Citation Analyst
3. Update the citation checklist located on the front the of the citation case file	Citation Analyst
4. Review of an Enforcement Referral for Unapproved Schools . For review of an Enforcement Referral for an Approved School go to step 6. <ol style="list-style-type: none"> a. Review and read the Enforcement Referral, investigative report, and supporting evidence <ul style="list-style-type: none"> • Ensure that the evidence supports the alleged violated law b. Confirm the school was notified of the prohibitions against operating without Bureau approval c. Confirm evidence that the unapproved school does not fall under an exemption pursuant to the <u>California Education Code Section 94874</u>. <p><i>Note: The Bureau wants to ensure that we are not citing a school that is exempt from the Bureau's laws.</i></p> <ul style="list-style-type: none"> • <i>Example of exemption that a school may fall under: CEC §94874(f) provides in part that an institution is exempt from the Bureau's laws if the institution does not award degrees and that solely provides</i> 	Citation Analyst

educational programs for total charges of two thousand five hundred dollars (\$2,500) or less when no part of the total charges is paid from state or federal student financial aid programs (federal funding, state funding, county funding, etc.)

- If the referral does not contain evidence of non-exemption verify that the school was notified to provide evidence if they are exempt and that the school did not prove they were an exempt institution.
 - The Bureau can still issue a citation even with no evidence of non-exemption was obtained. If the Bureau attempted to obtain evidence from the school, and the school did not respond, the Bureau can move forward with a citation because the burden of proof is on the school.
- d. Confirm evidence of ownership **and** the degree of the owner's involvement of committing the alleged violation was provided by the referring analyst
 - Each owner will be cited a separate citation with varying fines up to \$50,000.00
- e. Verify all school locations (addresses) were provided by the referring analyst
 - All school locations will be cited
 - If the school has multiple locations verify with your manager if each location will be cited or all locations included in one citation
- f. Verify all known addresses of the owner(s) and agent for service of process, which include business addresses, mailing addresses, and home addresses, were provided by the referring analyst
 - A citation package will be mailed to all known addresses to ensure delivery of the citation
- g. If evidence supports the violation identified AND each required component was provided by the referring analyst move forward with drafting a citation, by doing the following:
 - Draft citation and hold to present this case and your recommendations in monthly citation meeting. Fine assessments and order(s) of abatement will be unanimously decided upon by the citation committee.

<p>h. If the evidence does not support the violation identified or a required component was not provided by the referring analyst, submit a memorandum to the Discipline manager for recommendation of non-issuance of the citation, and case closure or for further investigation. The Discipline manager will either agree or disagree with your recommendation.</p> <ul style="list-style-type: none"> • The discipline manager will submit the case back to you for case closure or to transfer to an investigator for further investigation. 	
<p>5. Review of an Enforcement Referral for Approved Schools.</p> <p>a. Review and read the Enforcement Referral, investigative report, and supporting evidence</p> <ul style="list-style-type: none"> • Ensure evidence supports the alleged violated law <p>b. If evidence supports the violation(s) identified move forward with issuing a citation, by doing the following:</p> <ul style="list-style-type: none"> • Draft citation and hold to present this case and your recommendations in monthly citation meeting. Fine assessments and order(s) of abatement will be unanimously decided upon by the citation committee. <p>c. If the evidence does not support the violation(s) identified, submit a memorandum to the Discipline manager for recommendation of non-issuance of the citation, and case closure or for further investigation. The Discipline manager will either agree or disagree with your recommendation.</p> <ul style="list-style-type: none"> • The discipline manager will submit the case back to you for case closure or to transfer to an investigator for further investigation. 	<p>Citation Analyst</p>

Title: Citation Committee Meeting	Supersedes: July 8, 2013 Amended February 1, 2014	Procedure #: 2015-0017
Procedure Owner: Enforcement Unit	Effective: Immediately	Page: 1 of 3
Issue Date: February 25, 2015	Approved By:   Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Bureau for Private Postsecondary Education (Bureau) has authority to issue citations containing orders of administrative fines, abatement, and/or restitution (Citation) against persons who have proper approval to operate a private, postsecondary institution (institution) and persons who do not have approval to operate an institution. (See Business and Professions (B&P) Code §§ 125.9, 148; Private Postsecondary Education Act of 2009 (The Act) §§ 94936, 94941, 94944; and Title 5 of the California Code of Regulations (BPPE Regulations) §§ 75020, 75030).

Purpose: A Citation is issued when an institution fails to comply with a Notice to Comply or it is found that an institution committed a violation of the Act or Bureau regulations (The Act § 94936(a)). The Bureau will base its assessment of the administrative fine on: the nature and seriousness of the violation; the persistence of the violation; the good faith of the institution; the history of previous violations; the purposes of the Act and Bureau regulations; and the potential harm to the students. (The Act § 94936(b)(2)(A-F)). The amount of the administrative fine varies. (See Guide to Assessment of Administrative Fines in Cite and Fine attachment folder.) Failure to comply with a citation order may result in disciplinary action (BPPE Regulations § 75020(c)(4)).

Citation(s) constitute a public record of the action taken and are posted on the Bureau's web site.

Definitions: The Committee consists of the Bureau Chief, Deputy Bureau Chief, Enforcement Chief, Discipline Manager, Citation Analyst, and a Compliance/Complaint Analyst. The Committee meets monthly to review violation(s) and supporting evidence in each Enforcement

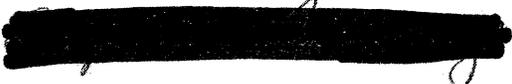
Referral and unanimously agrees upon an assessment of fine, an order of abatement and restitution, if any.

Productivity Benchmarks: The time spent preparing for and leading the citation committee meetings varies greatly depending on how many violations the institution had and how many exhibits of evidence were needed. The amount of citation cases will be presented at that particular meeting also varies. On average, the Citation Analyst will spend approximately 38 hours preparing for and leading the citation committee meetings.

Procedures:

Task	Who is Responsible
1. Citation Committee meetings are to be held once a month <ul style="list-style-type: none"> a. The citation analyst will lead the meeting b. The citation analyst will decide when the meetings will be held unless otherwise advised by the Discipline manager. c. The citation analyst will need to send out meeting invitations via outlook to the citation committee members. Be sure to use the 'scheduling assistant' in outlook to verify the committee member's availability. <ul style="list-style-type: none"> • In the meeting invitation e-mail include the 'Subject' and 'Tasks to be completed' in the body of the e-mail. Feel free to include the names of the schools/cases to be discussed in the 'Tasks to be completed'. <ul style="list-style-type: none"> ○ Example: <ul style="list-style-type: none"> Subject: November Monthly Citation Committee Meeting Tasks to be completed: Unanimously assess fines for multiple violations in 3-4 citation cases. 	Citation Analyst
2. Present to the Citation Committee the Citation Drafts for to be assessed fines and orders of abatement. <ul style="list-style-type: none"> a. Bring the following: Citation Draft, fine assessment worksheets, evidence package, case file, and BPPE laws and regulations for reference. 	Citation Analyst
3. During the meeting make notes on changes needed	Citation Analyst
4. The Citation Committee will give you instructions on how to	Citation Analyst

<p>move forward with the Citation draft. They will either:</p> <ol style="list-style-type: none">a. Move forward with issuance of a citation with:<ul style="list-style-type: none">• Fine and order of abatement or,• No fine and an order of abatement or,• Fine and no order of abatementb. Close the Citation Referral case and Forward for a compliance inspectionc. Close Citation referral case (violations unsubstantiated)d. Contact the school to obtain compliancee. Transfer to investigator for further investigationf. Or various other outcomes.	
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Title: Citation Referral Case Closure	Supersedes: July 8, 2013 Amended February 1, 2014	Procedure #: 2015-0018
Procedure Owner: Enforcement Unit	Effective: Immediately	Page: 1 of 4
Issue Date: February 25, 2015	Approved By:   Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Bureau for Private Postsecondary Education (Bureau) has authority to issue citations containing orders of administrative fines, abatement, and/or restitution (Citation) against persons who have proper approval to operate a private, postsecondary institution (institution) and persons who do not have approval to operate an institution. (See Business and Professions (B&P) Code §§ 125.9, 148; Private Postsecondary Education Act of 2009 (The Act) §§ 94936, 94941, 94944; and Title 5 of the California Code of Regulations (BPPE Regulations) §§ 75020, 75030).

Purpose: A Citation is issued when an institution fails to comply with a Notice to Comply or it is found that an institution committed a violation of the Act or Bureau regulations (The Act § 94936(a)). The Bureau will base its assessment of the administrative fine on: the nature and seriousness of the violation; the persistence of the violation; the good faith of the institution; the history of previous violations; the purposes of the Act and Bureau regulations; and the potential harm to the students. (The Act § 94936(b)(2)(A-F)). The amount of the administrative fine varies. Failure to comply with a citation order may result in disciplinary action (BPPE Regulations § 75020(c)(4)).

Citation(s) constitute a public record of the action taken and are posted on the Bureau's web site.

Definitions: The Complaint Investigations Unit analysts are responsible for reviewing complaints, investigating unapproved institutions and expired approvals, researching applicable laws, and obtaining the necessary evidence that demonstrates a violation. When referring a case for issuance of a Citation, the case file and evidence that supports the alleged violation(s) must be included with the Citation Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval.

The Compliance Inspections Unit analysts are responsible for obtaining the necessary evidence that demonstrate continued non-compliance with minor violations listed on an issued Notice to Comply (NTC) and/or material violation(s). Compliance can be obtained with minor violations 30 days from when the NTC was issued. Institutions are not given the opportunity to obtain compliance with material violation(s). When referring a case for issuance of a Citation, the case file and evidence that supports the continued non-compliance or a material violation(s) must be included with the Enforcement Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval.

The Administration Unit, the Licensing Unit, the Education Specialist Unit, and Bureau Management are responsible for researching applicable laws, and obtaining the necessary evidence that demonstrate a violation. When referring a case for issuance of a Citation, evidence that supports the alleged violation(s) must be attached to the Enforcement Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval unless referral is directly from Bureau management.

Citation Order Package-

- 1) Citation: Assessment of Fine and/or Order of Abatement and/or Order of Restitution;
- 2) Applicable Laws Violated;
- 3) Statement of Rights: Appeal Process Information Sheet;
- 4) Notice of Appeal of Citation – Request for Informal Conference and/or Administrative Hearing;
- 5) Payment of Fine – Waiver of Appeal Rights;

Citation Program Committee – The Committee consists of the Bureau Chief, Deputy Bureau Chief, Enforcement Chief, Discipline Manager, Citation Analyst, and a Compliance Analyst. The Committee meets monthly to review violation(s) and supporting evidence in each Enforcement Referral and unanimously agrees upon an assessment of fine, an order of abatement and restitution, if any.

Orders of Abatement

An order of abatement may require an institution to demonstrate how future compliance with the Act and Bureau regulations will be accomplished (The Act § 94936(b)(1)).

An order of abatement against a person operating a private postsecondary institution without proper approval may order that person to cease operations of the institution. Additionally, the BPPE may require the unapproved institution to cease any unlawful advertising and order the telephone company to disconnect the telephone services furnished to any telephone number(s) contained in the unlawful advertising. (BPPE Regulations § 75020(b); B&P § 149)

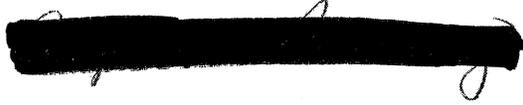
There is a monthly **Citation Program Committee** meeting held. The citation analyst will present the referred violated code section(s) with supporting evidence as well as the research obtained at the Citation Program Committee meeting. The Citation Program Committee will review the referred violated code section(s) and unanimously agree upon an order of abatement, an assessment of fine and or restitution, if any.

Productivity Benchmarks: The time spent closing citation referral's is approximately 1 hour.

Procedures:

Task	Who is Responsible
<p>Citation Referrals are considered closed when the determination has been made that the citation referral will not be moving forward for issuance of a citation.</p>	
<p>1. Update the Citation Program Aging Log [REDACTED]</p> <ul style="list-style-type: none"> a. Delete the case off of the 'Citation Referral Intake Log' tab. b. Add the case to the 'Closed Citation Referrals' tab c. Ensure all cells are filled in 	Citation Analyst
<p>2. Update SAIL</p> <ul style="list-style-type: none"> a. Enter the 'Date Closed'. <ul style="list-style-type: none"> • The case closure date in the Citation Program Aging Log should match the closure date in SAIL b. Update comments of case closure. Why was referral closed.. c. Enter a 'Basis for Enforcement File Closure' 	Citation Analyst
<p>3. Send an e-mail to the referring analyst who referred the case and copy their manager in the e-mail, to inform them of the Citation Referral closure.</p> <ul style="list-style-type: none"> a. Include the reason for closure (Example: unsubstantiated.) b. Attach memorandum, if applicable 	Citation Analyst
<p>4. Move the electronic case file from Pending Citation Referrals [REDACTED] case folder to Closed Citation Referrals [REDACTED]</p>	Citation Analyst

5. Update the Note to File <ul style="list-style-type: none">• Include the case closure date and the closure reason	Citation Analyst
6. Organize the case file and file it in the Closed Citations file cabinet.	Citation Analyst

Title: Issuance of a Citation	Supersedes: July 8, 2013 Amended February 1, 2014	Procedure #: 2015-0019
Procedure Owner: Enforcement Unit	Effective: Immediately	Page: 1 of 15
Issue Date: February 25, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Bureau for Private Postsecondary Education (Bureau) has authority to issue citations containing orders of administrative fines, abatement, and/or restitution (Citation) against persons who have proper approval to operate a private, postsecondary institution (institution) and persons who do not have approval to operate an institution. (See Business and Professions (B&P) Code §§ 125.9, 148; Private Postsecondary Education Act of 2009 (The Act) §§ 94936, 94941, 94944; and Title 5 of the California Code of Regulations (BPPE Regulations) §§ 75020, 75030).

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Citation(s) constitute a public record of the action taken and are posted on the Bureau's web site.

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must be included with the Citation Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval.

The Compliance Inspections Unit analysts are responsible for obtaining the necessary evidence that demonstrate continued non-compliance with minor violations listed on an issued Notice to Comply (NTC) and/or material violation(s). Compliance can be obtained with minor violations 30 days from when the NTC was issued. Institutions are not given the opportunity to obtain compliance with material violation(s). When referring a case for issuance of a Citation, the case file and evidence that supports the continued non-compliance or a material violation(s) must be included with the Enforcement Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval.

The Administration Unit, the Licensing Unit, the Education Specialist Unit, and Bureau Management are responsible for researching applicable laws, and obtaining the necessary evidence that demonstrate a violation. When referring a case for issuance of a Citation, evidence that supports the alleged violation(s) must be attached to the Enforcement Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval unless referral is directly from Bureau management.

Citation Order Package-

- 1) Citation: Assessment of Fine and/or Order of Abatement and/or Order of Restitution;
- 2) Applicable Laws Violated;
- 3) Statement of Rights: Appeal Process Information Sheet;
- 4) Notice of Appeal of Citation – Request for Informal Conference and/or Administrative Hearing;
- 5) Payment of Fine – Waiver of Appeal Rights;

Citation Program Committee – The Committee consists of the Bureau Chief, Deputy Bureau Chief, Enforcement Chief, Discipline Manager, Citation Analyst, and a Compliance Analyst. The Committee meets monthly to review violation(s) and supporting evidence in each Enforcement Referral and unanimously agrees upon an assessment of fine, an order of abatement and restitution, if any.

Orders of Abatement

An order of abatement may require an institution to demonstrate how future compliance with the Act and Bureau regulations will be accomplished (The Act § 94936(b)(1)).

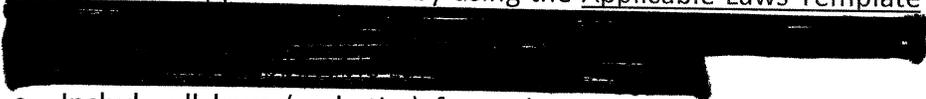
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There is a monthly **Citation Program Committee** meeting held. The citation analyst will present the referred violated code section(s) with supporting evidence as well as the research obtained at the Citation Program Committee meeting. The Citation Program Committee will review the referred violated code section(s) and unanimously agree upon an order of abatement, an assessment of fine and or restitution, if any.

Productivity Benchmarks: The time spent reviewing the case file and writing the citation varies greatly depending on how many violations the institution had and how many exhibits of evidence were needed. On average, the Citation Analyst will spend approximately 29 hours reviewing the case file and writing the citation.

Procedures:

Task	Who is Responsible
<p>When the determination has been made that the Citation Referral will move forward to issuance of a Citation these procedures apply.</p>	
<p>a. Prepare the Citation on the Citation Template [REDACTED]</p> <ul style="list-style-type: none"> • Update everything highlighted in yellow as it applies to the specific citation, in addition update the following with the specified information: <ul style="list-style-type: none"> ○ Title of the citation. The title should contain whether the citation is an: <ul style="list-style-type: none"> - Assessment of fine or - Order of abatement or - Order of restitution or - A combination of any of the three ○ Citation information section input the following: <ul style="list-style-type: none"> - <u>Institution Code</u>: Enter the Institution Code. If the school is unapproved input "None – Unapproved" - <u>Citation Number</u>: Input the citation number. To determine the citation number open up the Citation Program Aging Log [REDACTED] and look at the previous issued citation in the 'Open Citations' tab. <ul style="list-style-type: none"> ✓ Example: 1415017. The numbers "1415" represent the current fiscal year 2014-2015. The number "17" is the number of citations we have issued thus far 	

<p>in the fiscal year. So the next Citation Number would be 1415018.</p> <ul style="list-style-type: none"> - <u>Citation Issuance/Service Date</u>: Input the date that the citation will be signed by the Enforcement Chief and placed in the mail. The issue date and served date should be the same date. (Input the issuance date 2 weeks from when the citation is prepared to allow for processing time and management review time.) - <u>Due Date</u>: Input the date, 30 days from the date of issuance of the citation. - <u>Fine Amount</u>: Input the total fine amount assessed for the citation. - <u>Order of Abatement Included</u>: Input "Yes" or "No." o Un-highlight all the yellow highlighted text after updating the document 	
<p>b. Prepare the 'Applicable Laws' by using the Applicable Laws Template</p>  <ul style="list-style-type: none"> • Include all laws (verbatim) from The Act and BPPE Regulations that apply to the citation being issued <ul style="list-style-type: none"> o The purpose of this document is to provide the person/school being cited with applicable referenced laws. • Save the Applicable Laws to the electronic file. Save as 'Applicable Laws – [Insert Citation #]'. <ul style="list-style-type: none"> o Example: Applicable Laws – 1314001 	
<p>c. Send e-mail to OT to prepare the Citation Package. In the e-mail include</p> <ul style="list-style-type: none"> • The location of the citation case electronic file • The due date the citation package needs to be completed. (Tentative - The due date will be 24-48 hours after assigned.) • Addresses to include on the Declaration of Service. Include all known addresses (residential, business, etc.) of cited owner and the agent for service of process address. <ul style="list-style-type: none"> o This should have been included by the investigative analyst 	Citation Analyst
<p>d. Review the e-mail sent from the Citation Analyst. The e-mail will include:</p> <ul style="list-style-type: none"> • The location of the citation case electronic file • The due date the citation package needs to be completed. • Addresses to include on the Declaration of Service. 	Citation Analyst

<p>e. Open the citation case electronic file in the Citation Cases [REDACTED] folder and print the following documents:</p> <ul style="list-style-type: none"> • Citation (draft) - Print in color, and add it to the Citation package. <ul style="list-style-type: none"> ○ This document will already be saved in the citation case electronic file by the citation analyst. ○ You will not need to make any changes to this document. • Applicable Laws – Print and add it to the Citation Package <ul style="list-style-type: none"> ○ This document will already be saved in the citation case electronic file by the citation analyst. ○ You will not need to make any changes to this document. 	<p>Citation Analyst</p>
<p>f. Save the following Citation Package documents in the citation case electronic file: PLEASE ENSURE THAT YOU DO NOT EDIT THE ORIGINAL DOCUMENT. YOU MAY WANT TO SAVE A COPY TO YOUR DESKTOP TO ENSURE THAT THE ORIGINAL DOCUMENT IS NOT ALTERED.</p> <ul style="list-style-type: none"> • <u>Statement of Rights - Appeal Process Info Sheet</u> • <u>Notice of Appeal - Request for Hearing</u> • <u>Payment of Fine - Waiver of Appeal</u> • <u>Declaration of Service</u> <ul style="list-style-type: none"> ○ Save each document as: '[Insert Document Name] [Insert Citation #]'. <ul style="list-style-type: none"> - Example: Payment of Fine – Waiver of Appeal Rights 1314001; Notice of Appeal – Request for Hearing 1314001). ✓ To identify what Citation number to use, it can be located on the Citation draft. 	<p>Discipline Office Technician</p>
<p>g. Prepare the Statement of Rights, Notice of Appeal, and Payment of Fine by doing the following (go to step 'j' for preparation of the Declaration of Service):</p> <ul style="list-style-type: none"> • Update all yellow highlighted text to apply to the citation being issued • All information needed to update this document is located on the citation draft • The citation draft will indicate whether the school is unapproved or approved • Un-highlight all the yellow highlighted text after updating the document • Print the document (in color) and include it in the citation package. 	<p>Discipline Office Technician</p>

Discipline
Office
Technician

h. Prepare the Declaration of Service

The Declaration of Service is a signed document that the Bureau declares under penalty of perjury that the citation was served to the addresses listed.

The addresses to input on this document will be located in the e-mail that the citation analyst sent.

- 1) Update all yellow highlighted text to apply to the citation being issued
- 2) All information needed to update this document is located on the citation draft
 - o The Citation draft will indicate whether the school is unapproved or approved
- 3) In this section of the document, list the document(s) that the Bureau is serving

DECLARATION OF SERVICE BY CERTIFIED AND FIRST CLASS MAIL

Date of Issuance / Service	Citation Number	Institution / Owner or Operator	Institution Code
[INSERT]	[INSERT]	[INSERT]	[INSERT]

I, the undersigned, declare I am employed by the Bureau for Private Postsecondary Education, Department of Consumer Affairs, at whose direction this service is made. I am 18 years of age or older and not a party to the within cause; my business address is 2535 Capitol Oaks Drive, Suite 400, Sacramento, California 95833.

I am familiar with the business practice at the Bureau for Private Postsecondary Education for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Bureau for Private Postsecondary Education is collected and deposited with the United States Postal Service that same day in the ordinary course of business.

On DATE, I served the attached:

1. CITATION: ASSESSMENT OF FINE AND/OR ORDER OF ABATMENT AND/OR ORDER OF RESTITUTION No. [INSERT CITATION #]
2. APPLICABLE LAWS
3. STATEMENT OF RIGHTS: Appeal Process Information Sheet
4. NOTICE OF APPEAL OF CITATION: Request for Informal Conference and/or Administrative Hearing
5. PAYMENT OF FINE - WAIVER OF APPEAL RIGHTS

by placing a true copy thereof enclosed in two separate sealed envelopes, as certified mail with return receipt requested and as first class mail, in the internal mail collection system at the Bureau for Private Postsecondary Education, addressed as follows:

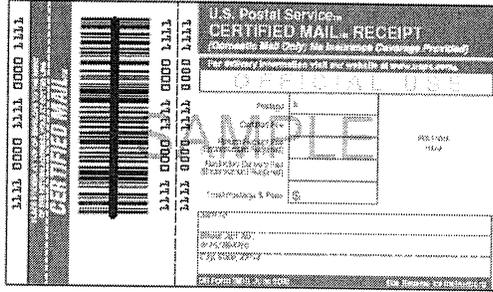
<u>NAME / ADDRESS</u> RESPONDENT NAME RESPONDENT ADDRESS RESPONDENT CITY, STATE ZIP	<u>CERTIFIED MAIL NUMBER</u> 7009 2820 0001 7216 0298
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I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed at Sacramento, California on DATE.

<u>[PRINT NAME]</u> Declarant	 Signature
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- 4) Un-highlight all the yellow highlighted text
- 5) Input the addresses that were provided in the e-mail from the citation analyst.
- 6) Input certified mail tracking numbers for **each** address listed
 - o Obtain certified mail numbers on the Certified Mail Form

3800, see below, which can be obtained in the Bureau's mailing station

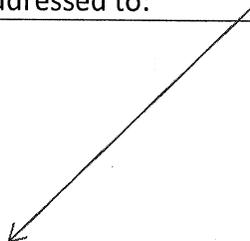


- Certified mail cannot be sent to a P.O. Box. If the address is a P.O. Box include it on the declaration of service but indicate "USPS regular mail" where the certified number would have been
- 7) Type your name above "Declarant".
 - The OT will be the person sealing the envelope and placing it in the outgoing mail
- 8) Print the Declaration document and add it to the Citation package
- 9) **Do not sign the declaration. The declaration will be signed by the person sealing the envelopes only after the envelopes are sealed and placed in the mail.**

<p>i. Submit the completed Citation Package to the Citation Analyst</p>	<p>Discipline Office Technician</p>
<p>j. Prepare (1) route slip listing the Discipline Manger, Enforcement Chief, and Bureau Chief for review.</p> <ul style="list-style-type: none"> • The Enforcement Chief will sign the citation 	<p>Discipline Office Technician</p>
<p>1. Citation Review and Approval</p> <p>a. Submit Citation Package, Declaration of Service with route slip placed on top to:</p> <ul style="list-style-type: none"> • Enforcement Chief <ul style="list-style-type: none"> ○ The Enforcement Chief will review the Citation Package, notate any corrections 	<p>Citation Analyst</p>
<p>b. The Citation Analyst will make the noted corrections and e-mail the updated Citation Package to the Bureau's Legal Counsel for review.</p>	<p>Citation Analyst</p>
<p>c. The Citation Analyst will make the noted corrections and submit the updated Citation Package to the Enforcement Chief for review, date and signature.</p>	<p>Citation Analyst</p>

<p>d. The Enforcement Chief will sign the Citation and write in the date the Citation will be mailed.*</p> <ul style="list-style-type: none"> • The issue date is the date the citation is signed. The served date is the date the citation is mailed. The issued date and served date should be the same date. <p><i>*Note: The Citation Analyst will let the Enforcement Chief know what date to write on the Citation. The Citation Analyst needs to determine the date the citation will be mailed. The mail is picked up by 11:30 a.m. daily. The Citation needs to be placed in the out-going mail before that time, for it to be considered served on that date.</i></p>	<p>DCA Legal Counsel</p>
<p>e. Scan a colored copy of the signed citation.</p> <ul style="list-style-type: none"> • Save the citation document in the electronic case file. Save as 'Citation [Insert Citation #]. ○ Example: Citation 1314001 	<p>Citation Analyst</p>
<p>f. Put the original signed citation in the physical case file.</p>	<p>Citation Analyst</p>
<p>g. E-mail the OT and inform him/her that the Citation Package has been approved and to mail out the Citation Packages. In the e-mail include the information:</p> <ul style="list-style-type: none"> • The due date the citation packages need to be mailed out by • Any changes to the dates or to the documents in the citation package 	<p>Citation Analyst</p>
<p>h. The OT will receive an e-mail from the Citation Analyst letting him/her know that the citation package has been approved and is ready to be mailed out. The e-mail will include the following information:</p> <ul style="list-style-type: none"> • The due date the citation packages need to be mailed out by.* • Any changes to the dates or to the documents in the citation package <p><i>Note: * The mail is picked up by 11:30 a.m. daily. The citation package needs to be placed in the out-going mail before that time, for it to be considered served on that date.</i></p>	<p>Citation Analyst</p>
<p>i. Go to the citation case electronic file and print out the citation package. The following documents will need to be printed (in color):</p> <ol style="list-style-type: none"> 1) The PDF signed copy of the Citation 2) Applicable Laws 3) Statement of Rights: Appeal Process Information Sheet 4) Appeal of Citation – Request for an Informal Conference and/or Administrative Hearing 5) Payment of Fine – Wavier of Appeal Rights 	<p>Citation Analyst</p>

6) Declaration of Service (Note this document will be included in the citation package <u>unsigned</u>).	
2. Prepare Citation Package for Mailing and Sign the Declaration of Service a. The original signed Citation and Declaration of Service will be kept in the Bureau's records. Do not send the original signed Citation or the Declaration of Service	Discipline Office Technician
b. Each Citation package will need a colored copy of the signed Citation: Assessment of Fine and/or Order of Abatement and/or Order of Restitution. Print colored copies from the saved PDF citation document located in the citation case electronic file. <ul style="list-style-type: none"> • All other documents, other than the Citation, do not have to be printed in color 	Discipline Office Technician
c. Make (1) colored copy of the Citation Package for the Bureau's records (case file).	Discipline Office Technician
d. Make (2) copies of the Citation Package for each address listed on the Declaration of Service	Discipline Office Technician
e. Obtain (2) envelopes for each address listed on the declaration. One for certified mail and one for regular mail. Each address listed on the declaration will have two envelopes 1) for Certified Mail and 2) for Regular Mail	Discipline Office Technician
f. Make (4) address labels for each address listed on the Declaration of Service 1) One label will be placed on the regular mail envelope. 2) One label will be placed on the certified mail envelope. 3) One label will be placed on the front of Form 3811, see below, under "1. Article Addressed to:"	Discipline Office Technician



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;">Name Address</div>	<p>3. Service Type</p> <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> G.O.D.
<p>2. Article Number: (Transfer from service label)</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
PS Form 3811, February 2004	Domestic Return Receipt

4) One label to place on the right side of certified mail receipt Form 3800, see below.

- g. Make return label with the Bureau's address, "Attn: [Insert Citation Analyst Name]" for each address listed on the Declaration of Service.
- The return label will be placed on the back of Form 3811, see below.

Discipline Office Technician

For each address listed on the Declaration of Service follow the below instructions for certified mail and regular mail:

Discipline Office Technician

CERTIFIED MAIL

- h. Remove the sticker which contains the article number of the mail

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receipt and place it on Form 3811

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

2. Article Number
(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly): Signature Agent Addressee

B. Date of Delivery

C. Signature

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

PS Form 3811, March 2001

U.S. Postal Service
CERTIFIED MAIL RECEIPT
Comments: Mail Only. No Insurance. Coverage Disabling.

OFFICIAL USE

Postage \$

Certified Fee \$

Agent Signature

Addressed to Signature

Restricted Delivery Fee (Domestic Mail Only)

Total Postage & Fees \$

7001 2510 0015 7030 4100
7001 2510 0015 7030 4100
7001 2510 0015 7030 4100

PS Form 3811, March 2001

i. Place an address label on the front of Form 3811

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Name
Address

2. Article Number
(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

PS Form 3811, February 2004

Discipline Office Technician

j. Check the "Certified Mail" and "Return Mail for Merchandise" boxes on Form 3811 as shown below:

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

2. Article Number
(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature Agent Addressee

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

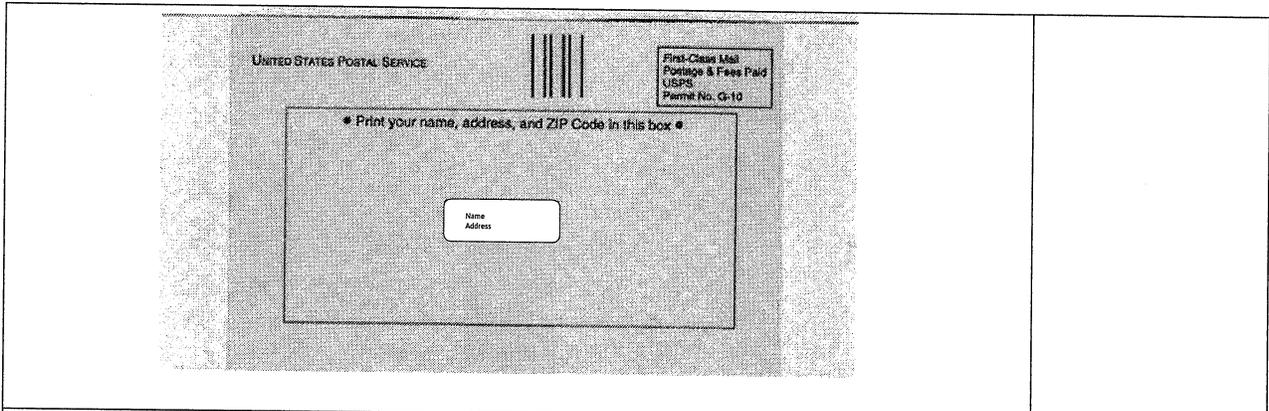
PS Form 3811, March 2001

Discipline Office Technician

k. On the back of Form 3811 attach a return address label

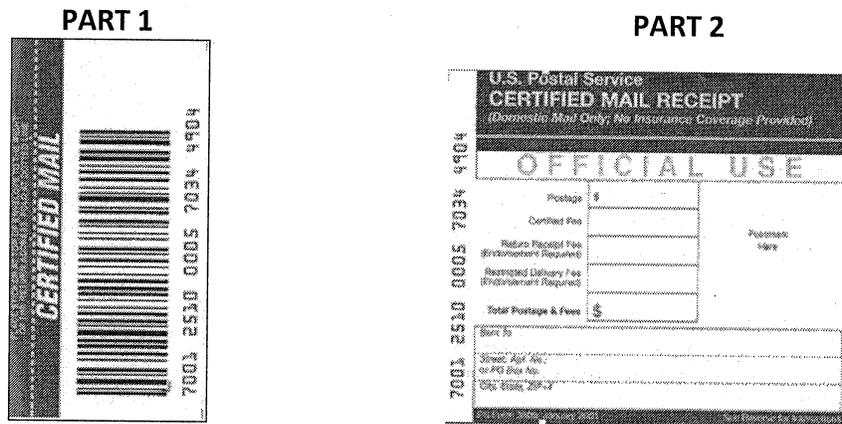
- Hand write the Citation Number for future reference in the bottom right corner. Example: 1213017

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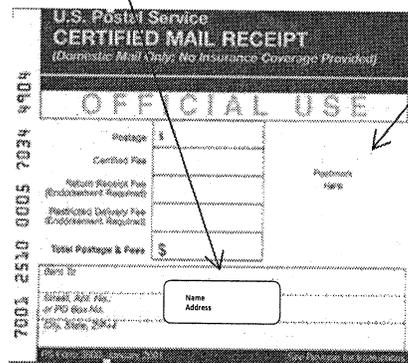
l. Separate From 3800 along the perforated line. Place Part 1 on the envelope and put part 2 to the side for later use.

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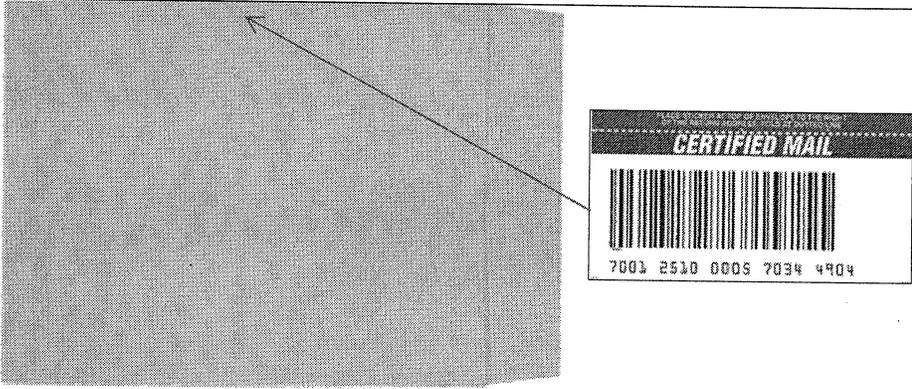
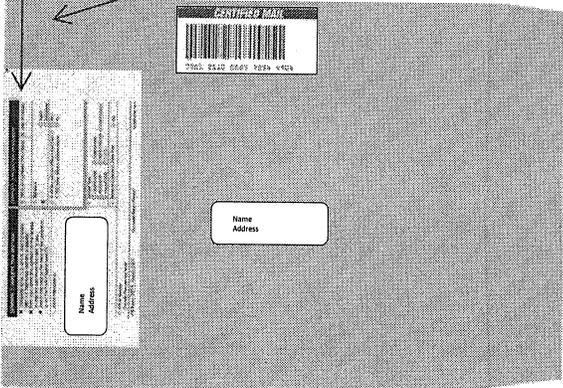
m. Place an address label on 'Part 2' and hand write the date the Citation Package was mailed. Put aside to be given to the citation analyst.

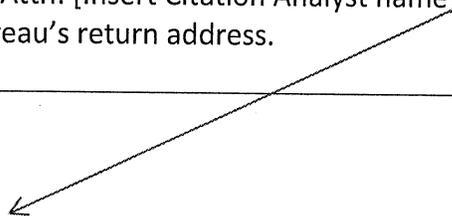
Discipline
Office
Technician

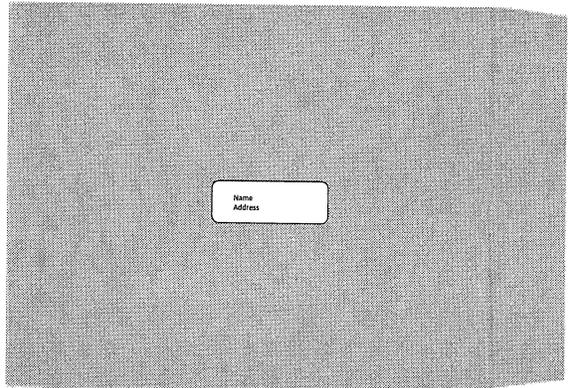


n. Place 'Part 1' on the front of the manila envelope as shown below

Discipline
Office
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<p>o. Place the completed 'Form 3811' on the manila envelope. See image below.</p> <p>p. Place an address label in the center of the each certified mailing envelope. See Below.</p> <p>q. Hand write "Attn: [Insert Citation Analyst name]" above the pre-stamped Bureau's return address on the envelope.</p> <p>r. The completed certified mail packet should look like the manila envelope shown below.</p> 	<p>Discipline Office Technician</p>
<p style="text-align: center;"><u>REGULAR MAIL</u></p> <p>s. Place an address label in the center of the each regular mailing envelope. See image below.</p>	<p>Discipline Office Technician</p>
<p>t. Hand write "Attn: [Insert Citation Analyst name]" above the pre-stamped Bureau's return address.</p>	<p>Discipline Office Technician</p>



<p>u. The completed regular mail packet should look like the manila envelope shown below.</p> 	
<p>v. Ensure you hand write "Attn: [Insert Citation Analyst name]" on every envelope above the Pre-stamped Bureau return address located on each envelope.</p> <ul style="list-style-type: none"> • If the mail gets returned the Administrative staff needs to know who to return the mail to. Returned citation packages are not to be un-sealed. 	<p>Discipline Office Technician</p>
<p>w. Ensure your put the citation number on the back of every 'Form 3811'</p> <p>**PLEASE NOTE: the certified mailing number and addresses on the envelopes should match the address and certified mailing numbers as listed on the declaration of service</p>	<p>Discipline Office Technician</p>
<p>x. Place a citation package in each envelope.</p> <ul style="list-style-type: none"> • Each document in the citation package should be stapled if 2 or more pages. 	<p>Discipline Office Technician</p>
<p>Do not seal the envelopes yet.</p>	<p>Discipline Office Technician</p>
<p>y. Submit the unsealed envelopes with the citation packages inside, to the citation analyst.</p>	<p>Discipline Office Technician</p>
<p>z. The Citation Analyst will check the packages for accuracy. (Quality control per management.)</p> <p>aa.</p>	<p>Discipline Office Technician</p>
<p>bb. The Citation Analyst will submit the packages to the OT to be sealed or inform the OT of the corrections that need to be made.</p>	<p>Discipline Office</p>

	Technician
Once the corrections are made, if any, the OT will seal the envelopes.	Citation Analyst
cc. After sealing the envelopes use the outgoing enforcement stamp "6802", to stamp every envelope. The "6802" stamp is located in the BPPE internal mailing station.	Citation Analyst
dd. Place the sealed, stamped envelope(s) in the outgoing mail. **It is very important, that the citation packages are mailed out on the service/issuance date indicated on the citation. Not before, or after that date. Mail is picked up at 11:30 daily, weekends excluded.	Discipline Office Technician
3. <u>Signing the Declaration and Other Tasks</u>	Discipline Office Technician
a. After each envelope is sealed, sign your name at the bottom of the Declaration of Service in the designated area.	Discipline Office Technician
b. Submit the colored, Citation Package, the signed declaration of service, and dated 'Form 3800's' to the citation analyst.	Discipline Office Technician
c. Print a colored copy of the signed Citation in the 'Issued Citations' binder	Discipline Office Technician

Title: After a Citation is Issued	Supersedes: July 8, 2013 Amended February 1, 2014	Procedure #: 2015-0020
Procedure Owner: Enforcement Unit	Effective: Immediately	Page: 1 of 6
Issue Date: February 25,2015	Approved By:   Bureau for Private Postsecondary Education	

Policy: The Bureau for Private Postsecondary Education (Bureau) has authority to issue citations containing orders of administrative fines, abatement, and/or restitution (Citation) against persons who have proper approval to operate a private, postsecondary institution (institution) and persons who do not have approval to operate an institution. (See Business and Professions (B&P) Code §§ 125.9, 148; Private Postsecondary Education Act of 2009 (The Act) §§ 94936, 94941, 94944; and Title 5 of the California Code of Regulations (BPPE Regulations) §§ 75020, 75030).

Purpose: A Citation is issued when an institution fails to comply with a Notice to Comply or it is found that an institution committed a violation of the Act or Bureau regulations (The Act § 94936(a)). The Bureau will base its assessment of the administrative fine on: the nature and seriousness of the violation; the persistence of the violation; the good faith of the institution; the history of previous violations; the purposes of the Act and Bureau regulations; and the potential harm to the students. (The Act § 94936(b)(2)(A-F)). The amount of the administrative fine varies. (See Guide to Assessment of Administrative Fines in Cite and Fine attachment folder.) Failure to comply with a citation order may result in disciplinary action (BPPE Regulations § 75020(c)(4)).

Citation(s) constitute a public record of the action taken and are posted on the Bureau's web site.

Definitions: The Discipline Unit has a designated analyst (citation analyst) who, among other assignments, performs the duties related to the Citation Program. Enforcement Referrals for issuing a Citation are received from the Complaint Investigations Unit, the Compliance Inspections Unit, the Administration Unit, the Licensing Unit, Education Specialist Unit and Bureau Management.

The Complaint Investigations Unit analysts are responsible for reviewing complaints, investigating unapproved institutions and expired approvals, researching applicable laws, and obtaining the necessary evidence that demonstrates a violation. When referring a case for

issuance of a Citation, the case file and evidence that supports the alleged violation(s) must be included with the Citation Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval.

The Compliance Inspections Unit analysts are responsible for obtaining the necessary evidence that demonstrate continued non-compliance with minor violations listed on an issued Notice to Comply (NTC) and/or material violation(s). Compliance can be obtained with minor violations 30 days from when the NTC was issued. Institutions are not given the opportunity to obtain compliance with material violation(s). When referring a case for issuance of a Citation, the case file and evidence that supports the continued non-compliance or a material violation(s) must be included with the Enforcement Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval.

The Administration Unit, the Licensing Unit, the Education Specialist Unit, and Bureau Management are responsible for researching applicable laws, and obtaining the necessary evidence that demonstrate a violation. When referring a case for issuance of a Citation, evidence that supports the alleged violation(s) must be attached to the Enforcement Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval unless referral is directly from Bureau management.

Citation Order Package-

- 1) Citation: Assessment of Fine and/or Order of Abatement and/or Order of Restitution;
- 2) Applicable Laws Violated;
- 3) Statement of Rights: Appeal Process Information Sheet;
- 4) Notice of Appeal of Citation – Request for Informal Conference and/or Administrative Hearing;
- 5) Payment of Fine – Waiver of Appeal Rights;

Citation Program Committee – The Committee consists of the Bureau Chief, Deputy Bureau Chief, Enforcement Chief, Discipline Manager, Citation Analyst, and a Compliance Analyst. The Committee meets monthly to review violation(s) and supporting evidence in each Enforcement Referral and unanimously agrees upon an assessment of fine, an order of abatement and restitution, if any.

Orders of Abatement

An order of abatement may require an institution to demonstrate how future compliance with the Act and Bureau regulations will be accomplished (The Act § 94936(b)(1)).

An order of abatement against a person operating a private postsecondary institution without proper approval may order that person to cease operations of the institution. Additionally, the BPPE may require the unapproved institution to cease any unlawful advertising and order the telephone company to disconnect the telephone services furnished to any telephone number(s) contained in the unlawful advertising. (BPPE Regulations § 75020(b); B&P § 149)

There is a monthly **Citation Program Committee** meeting held. The citation analyst will present the referred violated code section(s) with supporting evidence as well as the research obtained at the Citation Program Committee meeting. The Citation Program Committee will review the referred violated code section(s) and unanimously agree upon an order of abatement, an assessment of fine and or restitution, if any.

Productivity Benchmarks: The Citation Analyst will spend approximately 2 hours after issuing a citation updating logs and writing emails.

Procedures:

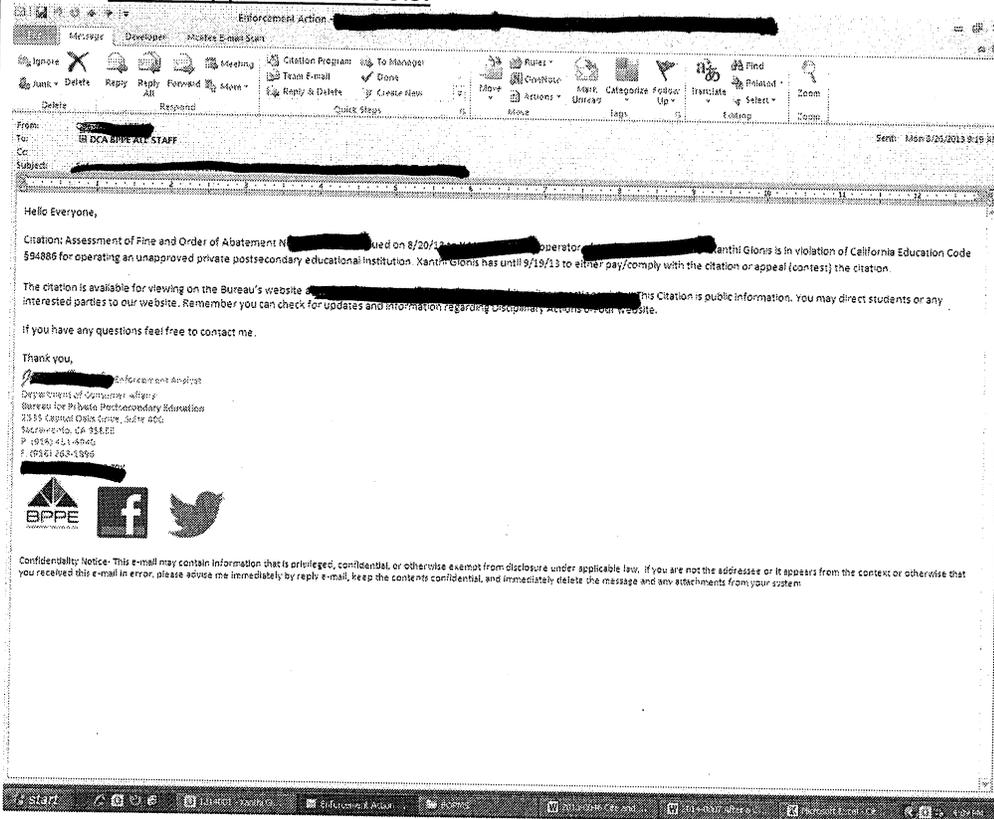
Task	Who is Responsible
<p>1. Update the Citation Program Aging log [REDACTED]</p> <p>a. Update the sections for the case located on the 'Citation Referral Intake Log' tab, if not already updated. The remaining sections need to filled out:</p> <ul style="list-style-type: none"> • <u>Date Citation Meeting Decision</u>: Input the date the Citation Meeting Decision was made • <u>Citation Drafted</u>: Input the date the Citation Analyst completed the first draft of the Citation. <ul style="list-style-type: none"> ○ Or put n/a if this section does not apply and the citation was withdrawn • <u>Draft Approved</u>: Input the date that final draft was approved, which is the date the Enforcement Chief signed the Citation. <ul style="list-style-type: none"> ○ Or put n/a if this section does not apply and the citation was withdrawn • <u>Citation Issue Date</u>: Input the date the citation was issued (signed/mailed/served). <ul style="list-style-type: none"> ○ Or put n/a if this section does not apply and the citation was withdrawn • <u>Citation Referral Withdrawn Date</u>: Input the date the referral was withdrawn/closed. <ul style="list-style-type: none"> ○ A referral is considered withdrawn when a determination has been made that the Bureau will not move forward with issuance of a citation. (This will be decided in the Citation committee meeting or advised by the Enforcement Management.) <p>b. If the Enforcement Referral for Citation is <u>Withdrawn</u> do the following: (Go to step 'c' if the Enforcement Referral is moving</p>	<p>Citation Analyst</p>

<p>forward to a citation being <u>issued</u>)</p> <ul style="list-style-type: none"> • Remove the withdrawn referral case from the 'Citation Referral Intake Log' tab and add it to the 'CLOSED Citation Referrals' tab. • The status of the referral case should be changed to 'C' for closed, once it is transferred to the 'CLOSED Citation Referral' tab. • In the comment section put a brief explanation of why the referral was withdrawn. • Ensure that the 'Total Closed Citation Referrals' located towards the bottom of the Closed Citation Referrals are reflective of the newly added closed citation referral. • Ensure that the Total Open Citation Referrals located towards the bottom of the Citation Referral Intake Log tab are reflective of the newly removed citation referral. <p>c. If the Enforcement Referral for Citation has been approved for a Citation to be <u>issued</u> do the following:</p> <ul style="list-style-type: none"> • Remove the Citation referral case from the 'Citation Referral Intake Log' tab and add it to the 'CLOSED Citation Referrals' tab. <ul style="list-style-type: none"> ○ Once the Enforcement Referral becomes an Issued Citation the Enforcement Referral is considered closed but also an Open Citation. • The status of the referral case should be changed to 'C' for closed, once it is transferred to the 'CLOSED Citation Referral' tab. • In the comment section put the statement: "This is now a closed referral but an open citation case. The citation will now be tracked on the 'OPEN Citations' Worksheet tab in this excel document." • Ensure that the 'Total Closed Citation Referrals' are reflective of the newly added closed citation referral. • Open up the 'OPEN Citations' tab located in the same log and add the newly issued citation. • Input the following sections: #, Staff, Citation No., Case No., School/Owner, School #, Citation Type, Violation(s), Fine Amount, Restitution Ordered, and Citation Issue Date. • The remaining sections will need to be filled out as the information becomes available. 	
<p>2. Update SAIL</p> <p>a. Open SAIL</p> <ul style="list-style-type: none"> • Enter the case number 	<p>Citation Analyst</p>

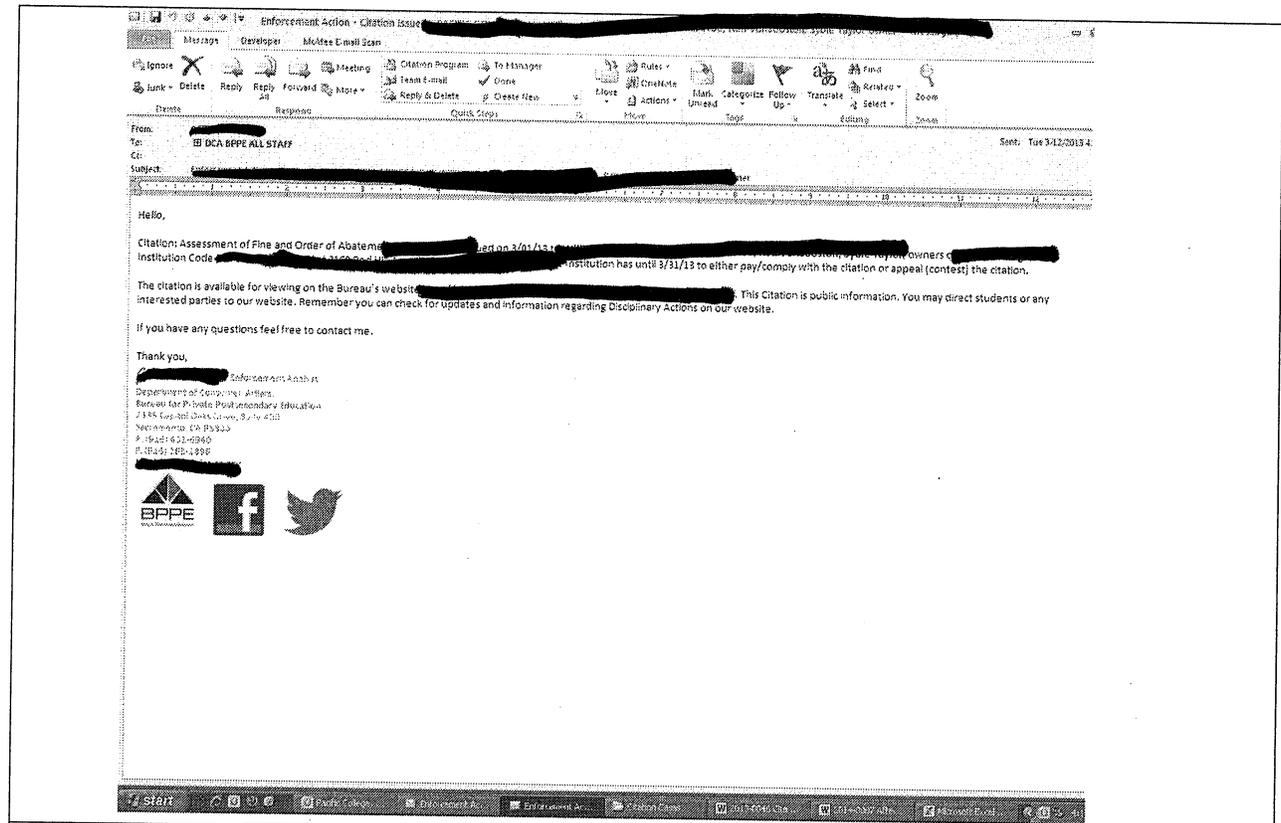
- Go to the comment section and enter a comment indicating a citation was issued and the date:
 - Example: "Citation: Assessment of Fine and Order of abatement #1213004 was issued on 2/5/13. See Bureau website for a copy of the citation and alleged violations committed."
- If the institution is an approved school update the main institution profile in SAIL.
 - Go to the comment section and enter a comment indicating a citation was issued and date and reference the case #:
 - Example: "Citation: Assessment of Fine and Order of abatement #1213004 was issued on 2/5/13. See Bureau website for a copy of the citation and alleged violations committed. See complaint #996554 for more details on the case."

3. Send e-mail to entire Bureau informing them that a citation was issued. See sample below.

For Unapproved schools:



For Approved Schools:



<p>4. Maintain <u>original</u> signed Citation, copy of the Citation Package and <u>original</u> signed declaration with attached Certified Mail Tag receipts in case file in the appropriate labeled section</p> <p>a. Monitor due dates of response (30 days from the date the Citation Order is served) (appeals/fines/abatelements/restitution)</p>	<p>Citation Analyst</p>
<p>5. Create a reminder on Microsoft outlook or a calendar to remind yourself of the citation 30-day deadline</p>	<p>Citation Analyst</p>
<p>6. Update Citation Checklist</p>	<p>Citation Analyst</p>

Title: Monitoring a Citation	Supersedes: July 8, 2013 Amended February 1, 2014	Procedure #: 2015-0021
Procedure Owner: Enforcement Unit	Effective: Immediately	Page: 1 of 6
Issue Date: February 25, 2015	Approved By:   Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Bureau for Private Postsecondary Education (Bureau) has authority to issue citations containing orders of administrative fines, abatement, and/or restitution (Citation) against persons who have proper approval to operate a private, postsecondary institution (institution) and persons who do not have approval to operate an institution. (See Business and Professions (B&P) Code §§ 125.9, 148; Private Postsecondary Education Act of 2009 (The Act) §§ 94936, 94941, 94944; and Title 5 of the California Code of Regulations (BPPE Regulations) §§ 75020, 75030).

Purpose: A Citation is issued when an institution fails to comply with a Notice to Comply or it is found that an institution committed a violation of the Act or Bureau regulations (The Act § 94936(a)). The Bureau will base its assessment of the administrative fine on: the nature and seriousness of the violation; the persistence of the violation; the good faith of the institution; the history of previous violations; the purposes of the Act and Bureau regulations; and the potential harm to the students. (The Act § 94936(b)(2)(A-F)). The amount of the administrative fine varies. Failure to comply with a citation order may result in disciplinary action (BPPE Regulations § 75020(c)(4)).

Citation(s) constitute a public record of the action taken and are posted on the Bureau's web site.

Definitions: The Complaint Investigations Unit analysts are responsible for reviewing complaints, investigating unapproved institutions and expired approvals, researching applicable laws, and obtaining the necessary evidence that demonstrates a violation. When referring a case for issuance of a Citation, the case file and evidence that supports the alleged violation(s) must be included with the Citation Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval.

The Compliance Inspections Unit analysts are responsible for obtaining the necessary evidence that demonstrate continued non-compliance with minor violations listed on an issued Notice to

Comply (NTC) and/or material violation(s). Compliance can be obtained with minor violations 30 days from when the NTC was issued. Institutions are not given the opportunity to obtain compliance with material violation(s). When referring a case for issuance of a Citation, the case file and evidence that supports the continued non-compliance or a material violation(s) must be included with the Enforcement Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval.

The Administration Unit, the Licensing Unit, the Education Specialist Unit, and Bureau Management are responsible for researching applicable laws, and obtaining the necessary evidence that demonstrate a violation. When referring a case for issuance of a Citation, evidence that supports the alleged violation(s) must be attached to the Enforcement Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval unless referral is directly from Bureau management.

Citation Order Package-

- 1) Citation: Assessment of Fine and/or Order of Abatement and/or Order of Restitution;
- 2) Applicable Laws Violated;
- 3) Statement of Rights: Appeal Process Information Sheet;
- 4) Notice of Appeal of Citation – Request for Informal Conference and/or Administrative Hearing;
- 5) Payment of Fine – Waiver of Appeal Rights;

Citation Program Committee – The Committee consists of the Bureau Chief, Deputy Bureau Chief, Enforcement Chief, Discipline Manager, Citation Analyst, and a Compliance Analyst. The Committee meets monthly to review violation(s) and supporting evidence in each Enforcement Referral and unanimously agrees upon an assessment of fine, an order of abatement and restitution, if any.

Orders of Abatement

An order of abatement may require an institution to demonstrate how future compliance with the Act and Bureau regulations will be accomplished (The Act § 94936(b)(1)).

An order of abatement against a person operating a private postsecondary institution without proper approval may order that person to cease operations of the institution. Additionally, the BPPE may require the unapproved institution to cease any unlawful advertising and order the telephone

Productivity Benchmarks: The time spent monitoring a citation varies greatly depending on how the institution responds to the citation. On average, the Citation Analyst will spend approximately 25 hours monitoring and following up on a citation.

Procedures:

Task	Who is Responsible
<p>The institution/owner cited has 30 days to either pay and comply with the citation or appeal the citation. Below are responses you may receive from the school/owner after a citation is issued.</p>	
<p>1. Appeal of Citation</p> <p>a. Update the Open Citations tab in the Citation Program Aging Log [redacted] and fill in the appropriate sections for that citation case.</p> <p>b. Refer to procedure entitled 'Appeals: informal conference and administrative hearing' on how to process an appeal of citation. [redacted]</p>	<p>Citation Analyst</p>
<p>2. Receipt of Payment of Fine</p> <p>a. You will receive a copy of the check, the envelope it came in, and any attachments from the Administration Unit.</p> <ul style="list-style-type: none"> • The original check will be sent to cashiering for processing. <p>b. Update the 'Open Citations' tab in the <u>Citation Program Aging Log</u> [redacted] in the section entitled:</p> <ul style="list-style-type: none"> • <u>Fine Received</u>: Enter the Date <p>c. Place copy of check in file and file it behind the appropriate section in the case file.</p> <p>d. Wait for the check from cashiering verifying that the check was processed and cleared</p> <p>e. Once the check has been processed update the 'Open Citations' tab in the <u>Citation Program Aging Log</u> [redacted] and fill in the section:</p> <ul style="list-style-type: none"> • <u>Fine Amount Paid</u>: Enter dollar amount <p>f. Update SAIL by:</p> <ul style="list-style-type: none"> • Adding a comment in the SAIL case number • Adding a comment in the main institution profile, if approved. <ul style="list-style-type: none"> ○ In the comment section state the Citation number, the 	<p>Citation Analyst</p>

amount paid, and the date the Bureau received payment.

- g. Send Receipt of Fine Letter - Template [REDACTED]
[REDACTED]
to owner/school confirming receipt of fine and if case is now closed. If not closed, include reminder of outstanding Order of Abatement and/or Order of Restitution
- Customize letter by choosing which grey highlighted area applies
 - Update all yellow highlighted text
 - Save copy in electronic folder
- h. Close case, unless Order of Abatement and/ or Order of Restitution is still outstanding; otherwise, continue to monitor Update citation status on the Bureau website [REDACTED]
[REDACTED] if receipt of fine is final resolution
- i. Update Citation Checklist

- a. Receipt of Confirmation of Compliance with Order(s) of Abatement and/or Order of Restitution
- b. Update the 'Open Citations' tab in the Citation Program Aging Log [REDACTED] and fill in the section entitled:
- c. Compliance with Abatement Received: Enter date
- d. Update SAIL by:
- e. Adding a comment in the SAIL case number
- f. Adding a comment in the main institution profile, if approved.
- g. In the comment section state the Citation number and that the evidence of compliance was received and pending review.
- h. Review evidence of compliance
- a. The BPPE Analyst will let you know if the response fulfills their order of abatement.
 - i. If compliance is met, close case, update SAIL, and update citation case on the Bureau website (see procedures above).
- i. After review, place evidence of compliance in file in the appropriate section in the case file
- j. Update the 'Open Citations' tab in the Citation Program Aging Log [REDACTED] and fill in the section entitled:

Citation Analyst

<p>k. <u>Compliance with Abatement</u>: Put an 'F', 'P' or 'No". (See key at the bottom of the log.</p> <p>l. If in compliance send <u>Evidence of Compliance Letter - Template</u> [REDACTED] [REDACTED] to school/owner confirming acceptance of compliance with Order of Abatement and/or Order of Restitution and if case is now closed. If not closed, include a reminder of the outstanding fine.</p> <p>m. Customize letter by choosing which grey highlighted area applies</p> <p>n. Update all yellow highlighted text</p> <p>o. Save copy in electronic folder</p> <p>p. Close case, unless Assessment of fine is still outstanding; if so, continue to monitor Update the Citation status on the Bureau website [REDACTED] [REDACTED] if compliance with Order of Abatement is final resolution</p> <p>q. Update Citation Checklist</p>	
<p>3. If No Response is Received (within 30 days for issuance)</p> <p>a. Add a case comment in the comment section on the <u>Citation Program Aging Log</u> [REDACTED] regarding the non-response</p> <p>b. Add comment in SAIL in the:</p> <ul style="list-style-type: none"> • Case SAIL number • Main institution profile, if an approved institution <p>c. Approved and Unapproved Institutions for:</p> <ul style="list-style-type: none"> • Non-payment <ul style="list-style-type: none"> ○ Send 3 demand letters every 30 days certified mail to the school/owner: <ul style="list-style-type: none"> - Demand Letter 1 [REDACTED] - [REDACTED] - Demand Letter 2 [REDACTED] - [REDACTED] - Demand Letter 3 [REDACTED] - [REDACTED] ○ If no payment is received send information to Franchise Tax Board (FTB). FTB form in on [REDACTED] <ul style="list-style-type: none"> - Collection of payment with FTB will only be attempted with schools we are able to obtain a Social Security 	<p>Citation Analyst</p>

Number or FEIN number.

- Schools that we cannot forward to FTB, meet with management to discuss how to move forward. Some possible outcomes are:
 - ✓ Forward to Department of Investigation (DOI)
 - ✓ Forward to the District Attorney's Office
 - ✓ Contact the local Department of Consumer Affairs
- If institution is approved and does submit payment, notify the Licensing Unit as this will impact the institution's ability to renew its approval to operate or have any applications processed.
- No evidence of compliance submitted
 - Meet with management to determine how to move forward. Possible outcomes of no response to order of abatement, depending on possible student harm are:
 - Refer for (formal) Disciplinary Action: revocation
 - Issue another Citation with a fine or increased fine
 - Send a letter (for schools that have paid but have not sent in evidence of compliance.
- If institution is not approved and the institution does not provide evidence of closure/ceasing to operate the following remedies are available:
 - Order to Disconnect. Send request to Public Utilities Commission to have the institution telephone disconnected. [REDACTED]
 - Referral to local District Attorney's Office for possible prosecution
 - Referral to local Department of Consumer Affairs

Title: Resolution T-17464 Order Phone Disconnect procedures	Supersedes: <p style="text-align: center;">None</p>	Procedure #: <p style="text-align: center;">2015-0022</p>
Procedure Owner: Discipline Unit	Effective: February 25, 2015	Page: 1 of 3
Issue Date: February 24, 2015	Approved By: <div style="text-align: center;">  , Deputy Bureau Chief Bureau for Private Postsecondary Education </div>	

Policy: B&P 149 Unlicensed Activity Enforcement

If, upon investigation, the Bureau for Private Postsecondary Education (Bureau) has probable cause to believe that a person is advertising with respect to the offering or performance of services, without being properly licensed by or registered with the Bureau to offer or perform those services, the Bureau may issue a citation containing an order of correction that requires the violator to do both of the following:

- *Cease the unlawful advertising.*
- *Notify the telephone company furnishing services to the violator to disconnect the telephone service furnished to any telephone number contained in the unlawful advertising.*
 - *This action is stayed if the person to whom a citation is issued under subdivision;*
 - *Notifies the Bureau in writing that he or she intends to contest the citation. The Bureau shall afford an opportunity for a hearing.*
- *If the person to whom a citation and order of correction is issued fails to comply with the order of correction after that order is final, the Bureau shall inform the Public Utilities Commission of the violation and the Public Utilities Commission shall require the telephone corporation furnishing services to that person to disconnect the telephone service furnished to any telephone number contained in the unlawful advertising.*
- *The good faith compliance by a telephone corporation with an order of the Public Utilities Commission to terminate service issued pursuant to this section shall constitute a complete defense to any civil or criminal action brought against the telephone corporation arising from the termination of service.*

Purpose: This resolution amends Resolution T-15630 authorizing the Executive Director to order the disconnection of telephone numbers appearing in advertisements by any unlicensed professional and vocational practitioners pursuant to requests from agencies listed in the current Business and Professions Code §149 and amended list of agencies in Business and

Professions Code §149 resulting from future statutory changes. The Bureau will base its decision to disconnect telephone numbers appearing on advertisements by unapproved schools by the nature and seriousness of the violation; the persistence of the violation; the good faith of the institution; the history of previous violations; the purposes of the Act and Bureau regulations; and the potential harm to the students. (The Act §94936 (b)(2)(A-F)).

Definitions: The Bureau has authority to order carriers to disconnect telephone numbers listed in alphabetical and classified directories by unlicensed professional and vocational practitioners in response to requests from the specified sixteen (16) boards, bureaus, committees, commissions or programs listed in Business and Professions (B&P) Code Section § 149. In 2014, state legislation revised B&P Code §149 to expand the list of boards, bureaus, committees, commissions or programs from 16 to those agencies listed in Section 101 of the B&P Code (Stats. 2014, Ch. 395, Effective January 1, 2015) and to remove the requirement that the advertising appear in a telephone directory. This resolution:

- expands the authority granted in Resolution T-15630 and authorizes the Executive Director to order telephone corporations to disconnect telephone numbers upon request of any boards, bureaus, committees, commissions or programs listed in B&P Code §101 without listing the boards, bureaus, committees, commissions, or programs to avoid the need to update this resolution in the event of changes in the B&P Code
- Deletes the requirement that the advertising appear in a telephone directory, and
- Adopts a revised template of the Order to Disconnect

Productivity Benchmarks: The time spent ordering a phone disconnect for an unapproved institution is approximately 4 hours.

Procedures:

Task	Who is Responsible
1. Determine that a violation of the Act or BPPE regulations has occurred and warrants an "Order to Disconnect".	Citation Analyst
2. Gather evidence (documents, statements, etc.) to support the "Order to Disconnect" (demand letters, abatement orders, etc.)	Citation Analyst
3. Complete the "Order to Disconnect" <ul style="list-style-type: none"> • See template  	Citation Analyst
4. Submit the "Order to Disconnect" and supporting evidence to the Enforcement Chief and/or Bureau Chief for approval.	Citation Analyst

<p>5. Once the "Order to Disconnect" is approved and signed by the Enforcement Chief and/or Bureau Chief, scan a copy of it to the electronic case file folder and make a photocopy for case file folder.</p> <p>6. Update all tracking systems: citation log [REDACTED] [REDACTED] SAIL and Note to File.</p>	<p>Citation Analyst</p>
<p>7. Mail "Order to Disconnect" to the address at the top of the letter (i.e. Public Utilities Commission) via certified mail. Prepare Certified Mail Postage.</p> <p>a. In the "Sender" section of the PS Form 3811 (green card), stamp the Bureau's address and write your name at the bottom of the card.</p> <p>b. In the "Article Addressed to" section 1 on the other side of the green card, write the address or prepare an address label.</p> <p>c. Remember: Use the Respondent's address as it is written on the Decision.</p> <p>d. Place certified mail number from PS Form 3800 in the "Article Number" section 2 of the green card.</p> <p>e. In section 3 of the green card check the "Certified Mail & Return Receipt for Merchandise" boxes of the green card.</p> <p>f. Tape the receipts to a green sheet of paper in the case folder.</p>	<p>Discipline Office Technician</p>
<p>8. When the confirmation of disconnection letter is received from the appropriate telephone provider:</p> <ul style="list-style-type: none"> • scan a copy to the electronic case folder • put the original letter in the case folder 	<p>Citation Analyst</p>
<p>9. Send out an email to the Enforcement Chief, Bureau Chief, Deputy Chief and the Compliance/Complaint Analyst who worked the case letting them know that the number has been disconnected.</p>	<p>Citation Analyst</p>

Title: Resolution T-17464 Order Phone Disconnect procedures	Supersedes: None	Procedure #: 2015-0022
Procedure Owner: Discipline Unit	Effective: February 25, 2015	Page: 1 of 3
Issue Date: February 24, 2015	Approved By:  Alyson Cooney, Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: B&P 149 Unlicensed Activity Enforcement

If, upon investigation, the Bureau for Private Postsecondary Education (Bureau) has probable cause to believe that a person is advertising with respect to the offering or performance of services, without being properly licensed by or registered with the Bureau to offer or perform those services, the Bureau may issue a citation containing an order of correction that requires the violator to do both of the following:

- *Cease the unlawful advertising.*
- *Notify the telephone company furnishing services to the violator to disconnect the telephone service furnished to any telephone number contained in the unlawful advertising.*
 - *This action is stayed if the person to whom a citation is issued under subdivision;*
 - *Notifies the Bureau in writing that he or she intends to contest the citation. The Bureau shall afford an opportunity for a hearing.*
- *If the person to whom a citation and order of correction is issued fails to comply with the order of correction after that order is final, the Bureau shall inform the Public Utilities Commission of the violation and the Public Utilities Commission shall require the telephone corporation furnishing services to that person to disconnect the telephone service furnished to any telephone number contained in the unlawful advertising.*
- *The good faith compliance by a telephone corporation with an order of the Public Utilities Commission to terminate service issued pursuant to this section shall constitute a complete defense to any civil or criminal action brought against the telephone corporation arising from the termination of service.*

Purpose: This resolution amends Resolution T-15630 authorizing the Executive Director to order the disconnection of telephone numbers appearing in advertisements by any unlicensed professional and vocational practitioners pursuant to requests from agencies listed in the current Business and Professions Code §149 and amended list of agencies in Business and

Professions Code §149 resulting from future statutory changes. The Bureau will base its decision to disconnect telephone numbers appearing on advertisements by unapproved schools by the nature and seriousness of the violation; the persistence of the violation; the good faith of the institution; the history of previous violations; the purposes of the Act and Bureau regulations; and the potential harm to the students. (The Act §94936 (b)(2)(A-F)).

Definitions: The Bureau has authority to order carriers to disconnect telephone numbers listed in alphabetical and classified directories by unlicensed professional and vocational practitioners in response to requests from the specified sixteen (16) boards, bureaus, committees, commissions or programs listed in Business and Professions (B&P) Code Section § 149. In 2014, state legislation revised B&P Code §149 to expand the list of boards, bureaus, committees, commissions or programs from 16 to those agencies listed in Section 101 of the B&P Code (Stats. 2014, Ch. 395, Effective January 1, 2015) and to remove the requirement that the advertising appear in a telephone directory. This resolution:

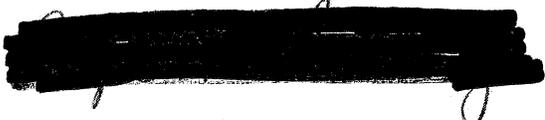
- expands the authority granted in Resolution T-15630 and authorizes the Executive Director to order telephone corporations to disconnect telephone numbers upon request of any boards, bureaus, committees, commissions or programs listed in B&P Code §101 without listing the boards, bureaus, committees, commissions, or programs to avoid the need to update this resolution in the event of changes in the B&P Code
- Deletes the requirement that the advertising appear in a telephone directory, and
- Adopts a revised template of the Order to Disconnect

Productivity Benchmarks: The time spent ordering a phone disconnect for an unapproved institution is approximately 4 hours.

Procedures:

Task	Who is Responsible
1. Determine that a violation of the Act or BPPE regulations has occurred and warrants an "Order to Disconnect".	Citation Analyst
2. Gather evidence (documents, statements, etc.) to support the "Order to Disconnect" (demand letters, abatement orders, etc.)	Citation Analyst
3. Complete the "Order to Disconnect" <ul style="list-style-type: none"> • See template (G:\BPPE\BPPE ENFORCEMENT\Cite & Fine Program\FORMS\Order to Disconnect.doc) 	Citation Analyst
4. Submit the "Order to Disconnect" and supporting evidence to the Enforcement Chief and/or Bureau Chief for approval.	Citation Analyst

<p>5. Once the "Order to Disconnect" is approved and signed by the Enforcement Chief and/or Bureau Chief, scan a copy of it to the electronic case file folder and make a photocopy for case file folder.</p> <p>6. Update all tracking systems: citation log G:\BPPE\BPPE ENFORCEMENT\Tracking Logs And Statistics\TRACKING LOGS\Citation Program Aging Log.xls SAIL and Note to File.</p>	Citation Analyst
<p>7. Mail "Order to Disconnect" to the address at the top of the letter (i.e. Public Utilities Commission) via certified mail. Prepare Certified Mail Postage.</p> <p>a. In the "Sender" section of the PS Form 3811 (green card), stamp the Bureau's address and write your name at the bottom of the card.</p> <p>b. In the "Article Addressed to" section 1 on the other side of the green card, write the address or prepare an address label.</p> <p>c. Remember: Use the Respondent's address as it is written on the Decision.</p> <p>d. Place certified mail number from PS Form 3800 in the "Article Number" section 2 of the green card.</p> <p>e. In section 3 of the green card check the "Certified Mail & Return Receipt for Merchandise" boxes of the green card.</p> <p>f. Tape the receipts to a green sheet of paper in the case folder.</p>	Discipline Office Technician
<p>8. When the confirmation of disconnection letter is received from the appropriate telephone provider:</p> <ul style="list-style-type: none"> • scan a copy to the electronic case folder • put the original letter in the case folder 	Citation Analyst
<p>9. Send out an email to the Enforcement Chief, Bureau Chief, Deputy Chief and the Compliance/Complaint Analyst who worked the case letting them know that the number has been disconnected.</p>	Citation Analyst

Title: Submit Enforcement Referral for Citation	Supersedes: July 8, 2013 Amended February 1, 2014	Procedure #: 2015-0023
Procedure Owner: Enforcement Unit	Effective: Immediately	Page: 1 of 2
Issue Date: February 25, 2015	Approved By:   Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Bureau for Private Postsecondary Education (Bureau) has authority to issue citations containing orders of administrative fines, abatement, and/or restitution (Citation) against persons who have proper approval to operate a private, postsecondary institution (institution) and persons who do not have approval to operate an institution. (See Business and Professions (B&P) Code §§ 125.9, 148; Private Postsecondary Education Act of 2009 (The Act) §§ 94936, 94941, 94944; and Title 5 of the California Code of Regulations (BPPE Regulations) §§ 75020, 75030).

Purpose: A Citation is issued when an institution fails to comply with a Notice to Comply or it is found that an institution committed a violation of the Act or Bureau regulations (The Act § 94936(a)). The Bureau will base its assessment of the administrative fine on: the nature and seriousness of the violation; the persistence of the violation; the good faith of the institution; the history of previous violations; the purposes of the Act and Bureau regulations; and the potential harm to the students. (The Act § 94936(b)(2)(A-F)). The amount of the administrative fine varies. Failure to comply with a citation order may result in disciplinary action (BPPE Regulations § 75020(c) (4)).

Citation(s) constitute a public record of the action taken and are posted on the Bureau's web site.

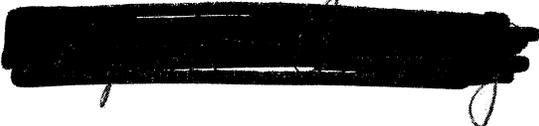
Definitions: The Complaint Investigations Unit analysts are responsible for reviewing complaints, investigating unapproved institutions and expired approvals, researching applicable laws, and obtaining the necessary evidence that demonstrates a violation. When referring a case for issuance of a Citation, the case file and evidence that supports the alleged violation(s)

must be included with the Citation Referral worksheet. Prior to forwarding the matter to the citation analyst, the referring analyst must obtain his/her manager's approval

Productivity Benchmarks: The time spent submitting an enforcement referral will vary greatly depending on how many violations the institution had and how many exhibits of evidence were needed; however, on average the BPPE Analyst will spend approximately 12 hours submitting enforcement referrals.

Procedures:

Task	Who is Responsible
1. Determine that a violation of the Act or BPPE regulations has occurred and warrants a citation.	BPPE Analyst
2. Gather evidence (documents, statements, etc.) for <u>each</u> violation referred to support the Enforcement Referral for citation.	BPPE Analyst
3. Complete the Enforcement Referral worksheet and include the supporting evidence. The Enforcement Referral worksheet is located in 	BPPE Analyst
4. Submit the Enforcement Referral worksheet and supporting evidence to your unit manager for approval.	BPPE Analyst
5. Once the Enforcement Referral is approved and signed by your unit manager, submit the Enforcement Referral, supporting evidence, and case file to the Discipline Manager for approval. Attention: Licensing, Admin and Education Specialist Units are not required to submit their original unit case file with the Enforcement Referral.	BPPE Analyst
6. If approved, the Discipline Manager will complete the Complaint Case Action Request form and submit it to the Discipline Office Technician for case intake. <ul style="list-style-type: none"> If the analyst who submitted the Enforcement Referral is in the Complaint Investigations Unit the analyst will fill out the Complaint Action Request form and submit it to the Discipline Office Technician for case intake. 	Discipline Manager

Title: Preparing the AG Transmittal Memorandum	Supersedes: May 20, 2013	Procedure #: 2015-0024
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 2
Issue Date: February 20, 2015	Approved By:   Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

1. *Obtaining an approval to operate by fraud.*
2. *A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: *This procedure documents the process for preparing the Ag Transmittal memorandum to ensure consistent results. The AG Transmittal Memorandum is sent to the Supervising Deputy Attorney General (SDAG) in one of the five AG field offices throughout the state, according to the area in which the violation(s) occurred. The AG field offices are located in Los Angeles, Oakland, Sacramento, San Diego, and San Francisco.*

Typically, the transmittal requests the preparation of a legal pleading that specifies the charges against the respondent (licensee or applicant). The legal pleading prepared is either a Statement of Issues (for applicant denials) or an Accusation (for licensees).

A Statement of Issues is the legal pleading which states the charges against a license applicant and the Bureau's authority to take action. The DAG prepares the Statement

of Issues and forwards it to the Bureau for the Bureau Chief's signature. Once signed, the DAG serves/-mails the Statement of Issues on the respondent.

An accusation is a legal pleading that states the charges against the respondent and the Bureau's authority to take action. The DAG drafts the Accusation and forwards it to the Bureau for the Bureau Chief's signature. Once signed, the DAG serves/-mails the Accusation on the respondent.

A respondent can request an administrative hearing in a citation case. When this happens, a transmittal is sent requesting an administrative hearing date and a legal pleading does not need to be prepared.

Definitions:

Material violations include, but are not limited to, misrepresentation, fraud in the inducement of a contract, and false or misleading claims or advertising, upon which a student reasonably relied in executing an enrollment agreement and that resulted in harm to the student.

Productivity Benchmarks: The time spent for the Office Technician to request the license certificate, make copies of case and send out to DAG will take four hours.

Procedures:

Task	Who is Responsible
1. Request a licensing certification from the Bureau Custodian of Records Liaison.	Office Technician
2. Send package certified mail. <ul style="list-style-type: none"> a. In the "Sender" section of the PS Form 3811 (green card), stamp the Bureau's address and write your name at the bottom of the card. b. In the "Article Addressed to" section 1 on the other side of the green card, write the appropriate SDAG's address. c. Place certified mail number from PS Form 3800 in the "Article Number" section 2 of the green card. In section 3 of the green card check the "Certified Mail & Return Receipt for Merchandise" boxes of the green card.	Office Technician

Title: <i>Serving a Signed Decision and Order</i>	Supersedes: May 20, 2013	Procedure #: 2015-0025
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 3
Issue Date: February 20, 2015	Approved By: [REDACTED] Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

1. *Obtaining an approval to operate by fraud.*
2. *A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: *This procedure documents the process for Serving a Signed Decision and Order to ensure consistent results. On the effective date, the Decision and Order is public information and should be posted to the Bureau's website and DCA should have a press release.*

After the effective date, the institution's approval to operate will be revoked and the owner will be required to comply with the Decision and Order, including payment of restitution and/or cost recovery.

Definitions:

The Discipline Analyst is responsible for preparing and monitoring cases sent to the Office of the Attorney General (AG).

Material violations include, but are not limited to, misrepresentation, fraud in the inducement of a contract, and false or misleading claims or advertising, upon which a

student reasonably relied in executing an enrollment agreement and that resulted in harm to the student.

Productivity Benchmarks: The time spent for the Office Technician to copy, mail and post to the BPPE Website will take 2 days.

Procedures:

Task	Who is Responsible
<p>1. Make Copies</p> <ul style="list-style-type: none"> a. Keep original signed documents for the case file. b. Two (2) copies for each address of the respondent (one certified and one regular mail). c. Two (2) copies for the respondent's attorney (one certified and one regular mail). d. One copy for the DAG. e. One copy for the Decision and Orders binder. 	<p>Office Technician</p>
<p>2. Prepare Certified Mail Postage.</p> <ul style="list-style-type: none"> a. In the "Sender" section of the PS Form 3811 (green card), stamp the Bureau's address and write your name at the bottom of the card. b. In the "Article Addressed to" section 1 on the other side of the green card, write the address or prepare an address label. c. Remember: Use the Respondent's address as it is written on the Decision. d. Place certified mail number from PS Form 3800 in the "Article Number" section 2 of the green card. <p>In section 3 of the green card check the "Certified Mail & Return Receipt for Merchandise" boxes of the green card.</p>	<p>Office Technician</p>
<p>3. Mailing Documents</p> <ul style="list-style-type: none"> a. Mail documents certified and regular mail to all applicable addresses (including address of record) to the 	<p>Office Technician</p>

<p>respondent.</p> <ul style="list-style-type: none"> b. Mail documents certified and regular mail to respondent's lawyer (if applicable). c. Documents being mailed to Respondent/Lawyer should include <u>unsigned</u> copy of Declaration of Service. d. Mail documents to the DAG. 	
<p>4. Bureau Website</p> <ul style="list-style-type: none"> a. Scan decision and order and email it to yourself. b. Save a copy in the s:/OIS/webposting folder. c. Email DCA Internet Team a request to post to BPPE website. d. Follow-up in one week if document is not posted to the BPPE website. 	<p>Office Technician</p>

Title: Working with the AG's Office	Supersedes: May 20, 2013	Procedure #: 2015-0026
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 4
Issue Date: February 20, 2015	Approved By:   Deputy Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution's approval to operate for:*

1. *Obtaining an approval to operate by fraud.*
2. *A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.*

Purpose: *This procedure documents the process for working with the AG's office to ensure consistent results. Once the case is forwarded to the AG's office, they will be representing the Bureau in the case. There will be no further contact between the Bureau and the institution owner and/or complainant. All questions and concerns should be forwarded to the assigned DAG.*

The following legal pleadings are typically used during the Bureau's disciplinary process:

<i>Legal Pleading</i>	<i>Prepared by</i>	<i>Signed by</i>
<i>Accusation</i>	<i>DAG</i>	<i>Bureau Chief</i>
<i>Statement of Issues</i>	<i>DAG</i>	<i>Bureau Chief</i>
<i>Default Decision and Order</i>	<i>DAG</i>	<i>DCA Director</i>
<i>Stipulated Agreement</i>	<i>DAG</i>	<i>DCA Director</i>
<i>Proposed Decision</i>	<i>Administrative Law Judge</i>	<i>Administrative Law Judge</i>
<i>Decision and Order</i>	<i>DAG</i>	<i>DCA Director</i>

After the DAG has prepared the legal pleading and it has been signed by the Bureau Chief, the DAG serves/-mails it on the respondent.

The DAG also sends a copy of all served documents to the Discipline Analyst who then files the documents and has them posted to the Bureau website

Definitions:

The Discipline Analyst is responsible for preparing and monitoring cases sent to the Office of the Attorney General (AG).

Material violations include, but are not limited to, misrepresentation, fraud in the inducement of a contract, and false or misleading claims or advertising, upon which a student reasonably relied in executing an enrollment agreement and that resulted in harm to the student.

*Notice of Defense and Request for Hearing - According to section 11506 of the APA, the respondent has **15 days** from the date of service to file a Notice of Defense (NOD) and request for hearing.*

*If the respondent files a timely NOD, the DAG submits a hearing request to the Office of Administrative Hearings (OAH) to obtain a hearing date. This process can take up to **30 days** and hearings are typically scheduled **6 – 12 months** in advance.*

The DAG will notify the Bureau with the OAH hearing date. [APA section 11506 (a)]

The Discipline Analyst should continue to monitor this process to make sure the hearing has been scheduled.

4.Types of Disciplinary Actions on the BPPE Website	
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1. Accusations
2. Amended Accusations
3. Statement of Issues
4. Citations
5. Decisions and Orders

**COMPLAINT
INVESTIGATION
UNIT
PROCEDURES**

Title: Unapproved Institutions- Unlicensed Activity	Supersedes: 2013-0023 April 22, 2013	Procedure #: 2013-0023
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 7
Issue Date: April 30, 2014	Approved By:  Bureau Chief Bureau for Private Postsecondary Education	

Policy: The Bureau’s enforcement program is responsible for investigating complaints filed with the bureau. The Bureau is responsible for have a program that proactively identifies unlicensed institutions and taking appropriate action against these institutions.

Purpose: Combating unlicensed activity is a priority of the Bureau and an important function of the Complaint Investigations Unit. In response to growing concerns regarding the number of unapproved institutions operating in California, the Unit has established a team of analysts to investigate complaints, tips and referrals of potential unlicensed activity. Pursuant to California Education Code (CEC) §94944 Fine for Unlicensed Activity, “Notwithstanding any other provision of law, the bureau shall cite any person, and that person shall be subject to a fine not to exceed fifty thousand dollars ((\$50,000), for operating an institution without proper approval to operate issued by the bureau pursuant to this chapter.

Definitions:

Approval to Operate: the authorization to offer to the public and to provide postsecondary educational programs

Approved to Operate: an institution has received authorization to offer postsecondary educational programs to the public.

Institution: any private postsecondary educational school, including its branch campuses and satellite locations.

Offer to the Public: advertise, publicize, solicit or recruit

Operate: establish, keep, or maintain any facility or location in this state where, or from which or through which, postsecondary educational programs are provided.

Owner: an individual in the case of a sole proprietorship, partners in a partnership, members in limited liability company, or shareholders in a corporation.

Ownership: legal or equitable interest in an institution, including ownership of assets or stock

Postsecondary education: a formal institutional educational program whose curriculum is designed primarily for students who have completed or terminated their secondary education or are beyond the compulsory age of secondary education, including programs whose purpose is academic, vocational, or continuing professional education

Private Postsecondary Educational Institution: a private entity with a physical presence in this state that offers postsecondary education to the public for an institutional charge.

Productivity Benchmark: (Include here the amount of staff time to complete this procedure and if some aspects of the procedure are not under our control (e.g. waiting for response from school), estimate the typical timeframe before hearing back to show the total elapsed time of the procedure.)

ENFORCEMENT SECTION

COMPLAINT INVESTIGATIONS PROCEDURES

UNAPPROVED INSTITUTIONS-UNLICENSED ACTIVITY

In addition to investigating complaints received from other entities, the Bureau's Unlicensed Activity Unit is responsible for proactively researching and searching for unlicensed institutions throughout the state of California.

A portion of the Unlicensed Activity Units Analyst's week (approximately four hours per week) is spent searching the internet and reviewing telephone directories for unlicensed institutions.

Possible internet resources are Facebook, Craigslist, and local telephone directories.

The California Employment Development Department (EDD) also has a website that lists training providers who are eligible to receive funding through the Workforce Investment Act. If a school receives this type of funding it must have Bureau approval. The analyst should monitor the EDD Eligible Training Provider List for school compliance. The list is comprised of qualified training providers that offer a wide range of education programs that include classroom training, correspondence courses, online education and apprenticeship programs.

The list is located at [REDACTED]. Schools that are found on the list that do not have Bureau approval should be investigated.

The Department of Homeland Security, Student and Exchange Visitor Program (SEVP) provide a listing of certified schools approved to accept international students. A complete list of the schools is available at [REDACTED]. The list should be searched for schools approved in California. The analyst can compare the list of schools to the school information in the Bureau's Schools Automated Information Link Database. Schools that are not approved by the Bureau should be researched to determine whether or not Bureau approval is required.

1. ESTABLISH JURISDICTION.

When a private postsecondary institution is suspected of operating in California without Bureau approval, the Complaint Investigations (CI) analyst gathers evidence to determine whether or not the institution has a physical presence in California and is required to have Bureau approval.

A. SEARCH THE SCHOOLS AUTOMATED INFORMATION LINK (SAIL) DATABASE.

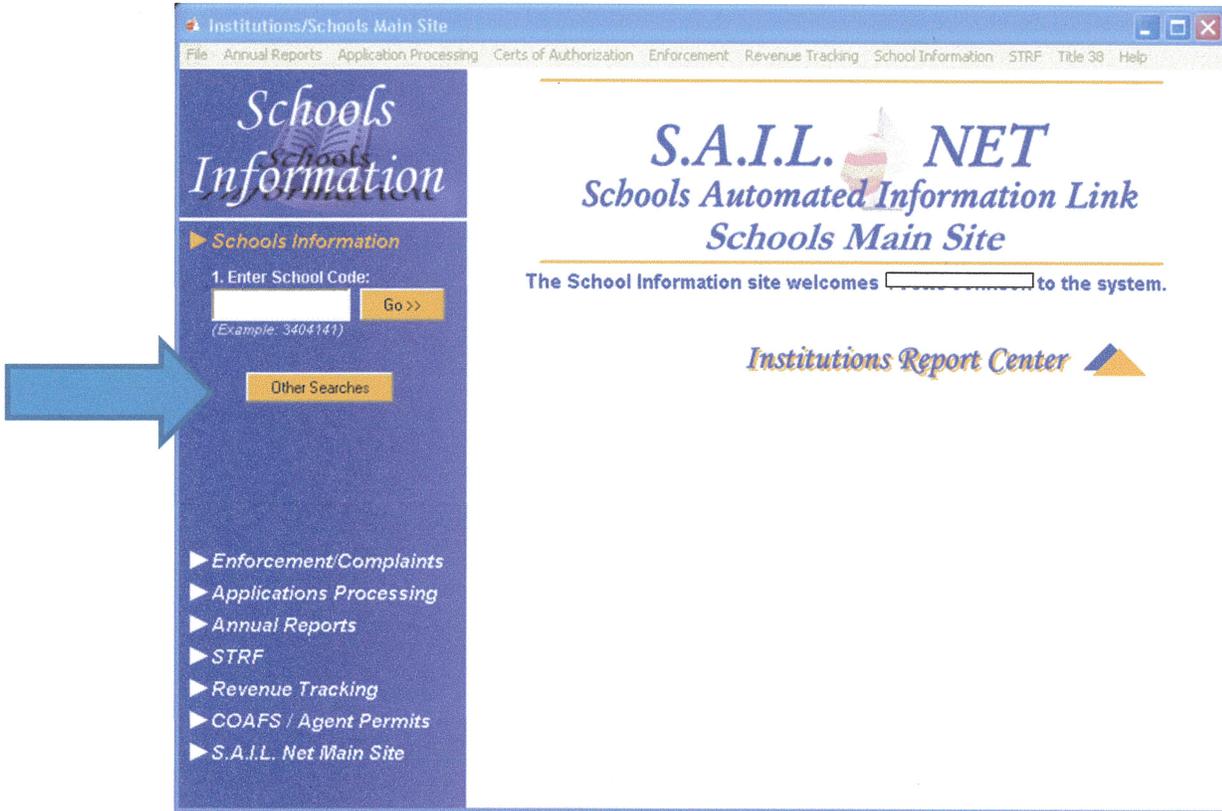
(1) Perform a search of the SAIL database to determine if the institution:

a. Has a current approval to operate with the Bureau.

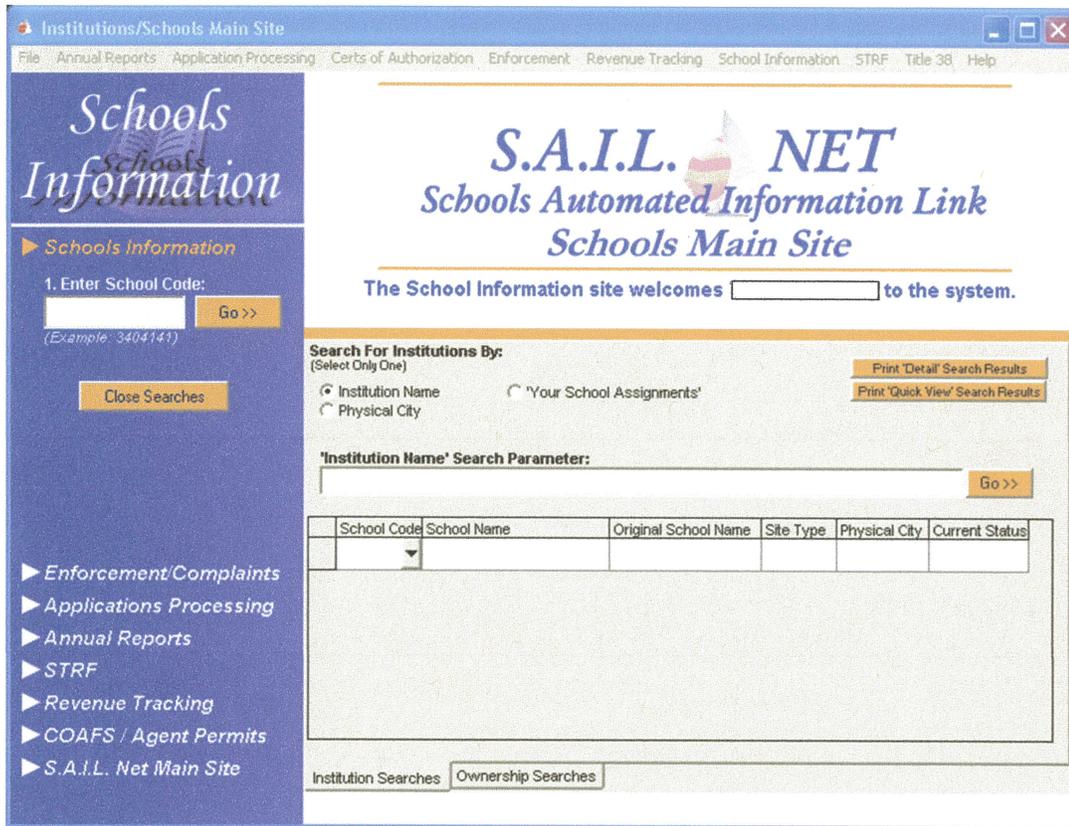
- In SAIL, under “School information”, enter school code, if one was provided.
- If it is a valid school code, the screen will populate with school information.

The screenshot shows a web browser window titled "Institutions/Schools Main Site". The browser's address bar and menu bar are visible. The main content area is divided into two sections. On the left is a dark blue sidebar with the "Schools Information" logo and a search form. The search form includes a text input field labeled "1. Enter School Code:" with a "Go >>" button and an example "(Example: 3404141)". Below the search form is a button labeled "Other Searches". At the bottom of the sidebar is a list of navigation links: "Enforcement/Complaints", "Applications Processing", "Annual Reports", "STRF", "Revenue Tracking", "COAFS / Agent Permits", and "S.A.I.L. Net Main Site". A large blue arrow points from the left towards the search input field. The main content area on the right has a white background with the "S.A.I.L. NET" logo and the text "Schools Automated Information Link Schools Main Site". Below this is a welcome message: "The School Information site welcomes [] to the system." At the bottom right of the main content area is the "Institutions Report Center" logo.

- If no school code or an invalid school code was provided, choose “other searches”.



- “Other Searches” provides the opportunity to search by partial or full school name, physical city, or ownership information.



The CI must search all available avenues in SAIL utilizing the information provided in the complaint or through other research findings. The CI must also use internet tools to identify any other institutional name, location(s) and ownership information that may assist in the SAIL search.

When reviewing school records, CI must check the school status and the approval expiration date in SAIL to determine if the institution has a valid "active" status and that the approval to operate has not expired.

Please note approved institutions are only approved to offer the specific programs at the specific locations contained in SAIL. The CI must ensure there is no evidence of an approved institution conducting unlicensed activity (offering unapproved programs, or operating from an unapproved location).

To check for program approval,

- enter institution name

Institutions/Schools Main Site

File Annual Reports Application Processing Certs of Authorization Enforcement Revenue Tracking School Information STRF Title 36 Help

Schools Information

S.A.I.L. NET

Schools Automated Information Link

Schools Main Site

The School Information site welcomes to the system.

1. Enter School Code:

(Example: 3404141)

Search For Institutions By:
(Select Only One)

Institution Name 'Your School Assignments'

Physical City

'Institution Name' Search Parameter:

There are(is) 11 Institution records found with search parameter: 'federico'.

School Code	School Name	Original School Name	Site Type	Physical City	Current Status
[REDACTED]	[REDACTED]	[REDACTED]	Main	Sacramento	Active
[REDACTED]	[REDACTED]	[REDACTED]	Main	Bakersfield	Active - Refer to Specialist
[REDACTED]	[REDACTED]	[REDACTED]	Satellite	Bakersfield	Active
[REDACTED]	[REDACTED]	[REDACTED]	Main	Fresno	Active - Refer to Specialist
[REDACTED]	[REDACTED]	[REDACTED]	Main	Fresno	Active - Refer to Specialist
[REDACTED]	[REDACTED]	[REDACTED]	Satellite	Fresno	Active

[Enforcement/Complaints](#)
[Applications Processing](#)
[Annual Reports](#)
[STRF](#)
[Revenue Tracking](#)
[COAFS / Agent Permits](#)
[S.A.I.L. Net Main Site](#)

- choose the specific school by clicking on the drop down arrow

Institutions/Schools Main Site

File: Annual Reports Application Processing Certs of Authorization Enforcement Revenue Tracking School Information STRF Title 38 Help

Schools Information

S.A.I.L. NET

Schools Automated Information Link

Schools Main Site

The School Information site welcomes to the system.

1. Enter School Code:

 (Example: 3404141)

Search For Institutions By:
 (Select Only One)

Institution Name "Your School Assignments"
 Physical City

Print 'Detail' Search Results
 Print 'Quick View' Search Results

'Institution Name' Search Parameter:

There are(is) 11 institution records found with search parameter: 'federico'.

School Code	School Name	Original School Name	Site Type	Physical City	Current Status
[REDACTED]	[REDACTED]	[REDACTED]	Main	Sacramento	Active
[REDACTED]	[REDACTED]	[REDACTED]	Main	Bakersfield	Active - Refer to Specialist
[REDACTED]	[REDACTED]	[REDACTED]	Satellite	Bakersfield	Active
[REDACTED]	[REDACTED]	[REDACTED]	Main	Fresno	Active - Refer to Specialist
[REDACTED]	[REDACTED]	[REDACTED]	Main	Fresno	Active - Refer to Specialist
[REDACTED]	[REDACTED]	[REDACTED]	Satellite	Fresno	Active

Institution Searches Ownership Searches

- this takes you to the "General School Information" screen

General School Information For School Code [REDACTED]

File Schedule A Site Visit

S. A. I. L. Schools

General Information

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Main

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: [REDACTED] Status Date: 9/7/2010 Site Type: Main School Code: [REDACTED]
(When the current status changed.) **AUDIT** Institution Code: 3

School/Institution Name: [REDACTED] **AUDIT**

Title IV Funding? OPE ID: [REDACTED] Addressing Preference:

School Physical Address: **AUDIT** School Mailing Address:

Sacramento, CA 95834 Sacramento, CA Phone Number: (916) [REDACTED] Fax Number: (916) [REDACTED]

County: Sacramento Accrediting Body/Agency: (> 2 please reflect in comments) Assigned Bureau Staff: [REDACTED] Date Assigned: 4/30/2012

NACCAS - National Accrediting Commission of Cosm Web Address (URL Address): [REDACTED]

Contact Info Ownership Custodian Agent for Process Branches/Satellites Site Visits

Approval Registrations Religious Exempt Programs Enforcement Revenue Tracking Applications

Institutional Approvals (past and present) for Institution Code # 3401271

Approval ID	Approval Status	Approval Date	Expiration Date	Temp Expiration Date *	Associated App	Active?
[REDACTED]	Accredited Institution Approval	5/12/2012	1/31/2016		24590	Yes
[REDACTED]	Full Approval	12/21/2005	6/28/2012		18630	No
[REDACTED]	Full Approval	6/30/2001	6/29/2005		6156	No
[REDACTED]	Full Approval	7/1/1995	6/30/2001			No
[REDACTED]	Full Approval	6/1/1981	7/1/1995			No

* 'Temp Expiration Date' only valid if the Approval Status is 'Temporary Approval'

- click on the "Programs" tab

General School Information For School Code # []

File Schedule A Site Visit

S. A. I. L. Schools

General Information

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Ma

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: [] Status Date: 9/7/2010 Site Type: Main School Code: []
(When the current status changed.) **AUDIT** Institution Code: []

School/Institution Name: [] **AUDIT**

Title IV Funding? OPE ID: [] Addressing Preference: []

School Physical Address: [] **AUDIT** School Mailing Address: []
 Sacramento, CA [] Phone Number: [] Fax Number: []

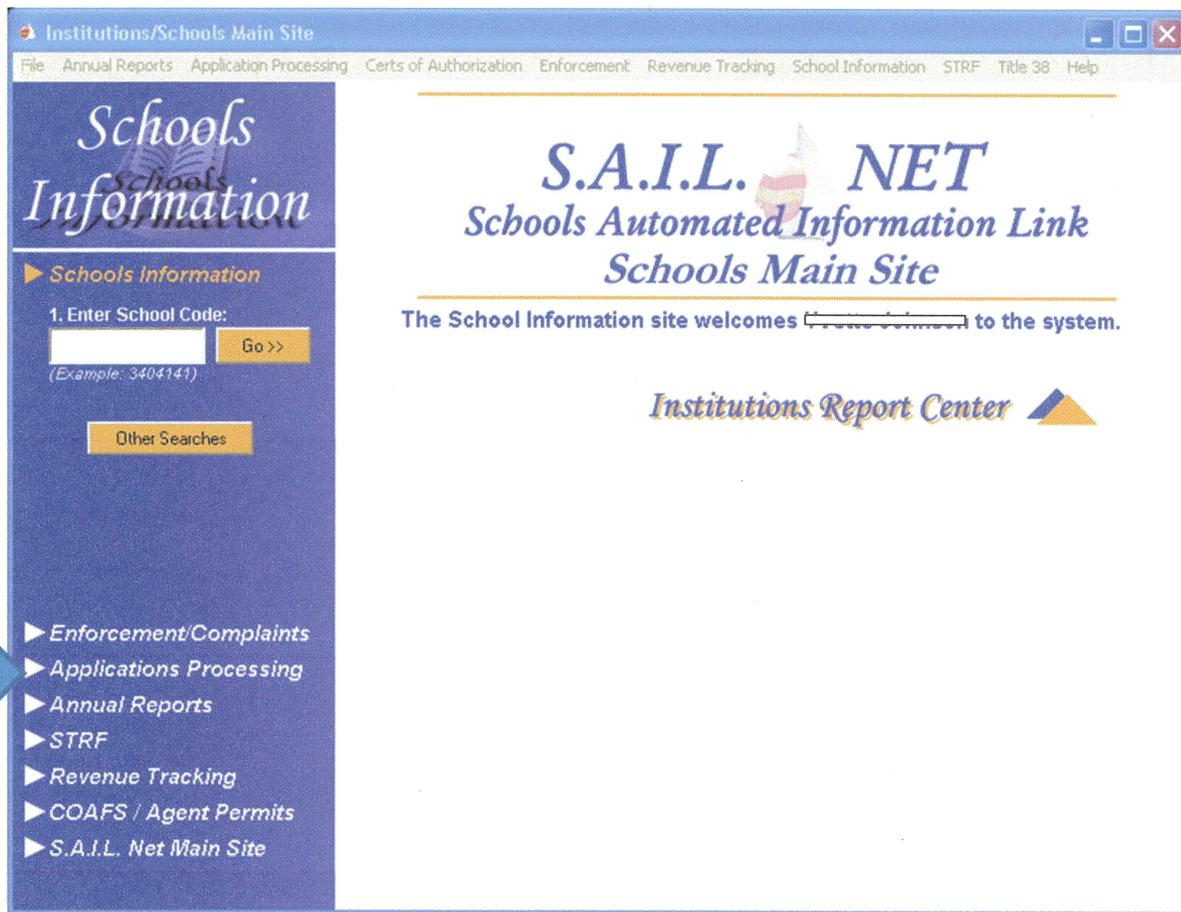
County: Sacramento Accrediting Body/Agency: (> 2 please reflect in comments)
 NACCAS - National Accrediting Commission of Cosn Web Address (URL Address): [] Assigned Bureau Staff: [] Date Assign: 4/30/2012

Contact Info | Ownership | Custodian | Agent for Process | Branches/Satellites | Site Visits
 Approval | Registrations | Religious Exemption | Other Exemptions | Programs | Enforcement | Revenue Tracking | Applications

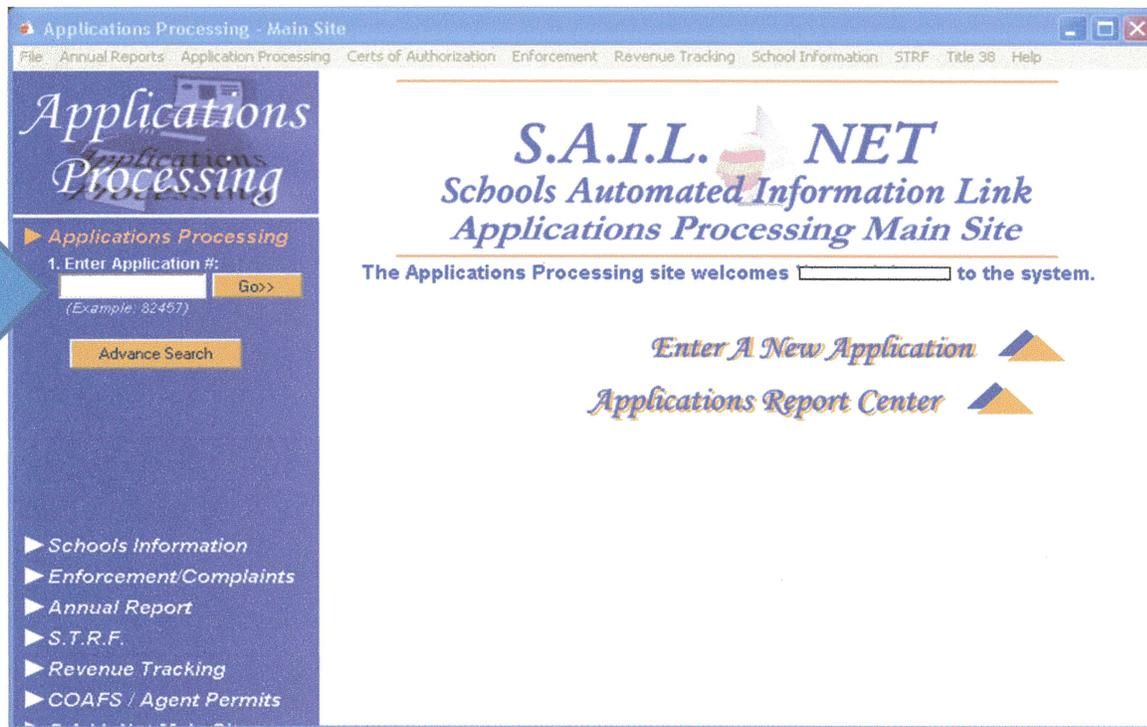
Programs/Courses for Institution Code []

Program Title	Program Type	Program Length (Hours or Lessons)	# of Units	Subject to MWV?	Approved On	Discontinued On
▶ Barber	Non-Degree	1500		No	5/7/2013	
Barber Crossover	Non-Degree	400		No	6/27/2013	
Cosmetology	Non-Degree	1600		No	3/1/1992	
Esthetician	Non-Degree	600		No	3/1/1992	
Massage Therapy - 24 Semester Credits	Non-Degree		24	No	8/10/2010	

- A list of approved programs appears. You may need to scroll down on the page for the complete list of approved programs
- Has an expired approval to operate
 Pursuant to 5 California Code of Regulations (CCR) §71475 (a) an institutions' approval to operate expires at midnight on the last day of the term of approval
 - Has been provided a verification of exemption from the Bureau.
 Review the physical Verification of Exemption Application files, located in the Bureau file room, for the institution to ensure the information provided on the application, if applicable, coincides with the information found during the investigation.
 - Has an application pending with the Bureau's Licensing Unit.
 - Check SAIL's "Application Processing" screen for submitted applications.



- Click on *Application Processing*.



- If available enter the Application Number
- If the Application number is not available click on "Advance Search"

Applications Processing - Main Site

File Annual Reports Application Processing Certs of Authorization Enforcement Revenue Tracking School Information STRF Title 38 Help

Applications Processing

▶ Applications Processing

1. Enter Application #:

(Example: 82457)

▶ Schools Information
 ▶ Enforcement/Complaints
 ▶ Annual Report
 ▶ S.T.R.F.
 ▶ Revenue Tracking
 ▶ COAFS / Agent Permits

S.A.I.L. NET

*Schools Automated Information Link
 Applications Processing Main Site*

The Applications Processing site welcomes to the system.

Enter A New Application

Applications Report Center

- Advance Search has the search criteria of school code, school name and application type.
- Enter the information you have available to perform a search.

Applications Processing - Main Site

File Annual Reports Application Processing Certs of Authorization Enforcement Revenue Tracking School Information STRF Title 38 Help

Applications Processing

S.A.I.L. NET

Schools Automated Information Link Applications Processing Main Site

The Applications Processing site welcomes to the system.

Applications Processing

1. Enter Application #: **Go >>**
(Example: 82457)

Close Advance Search

Choose Search Criteria:

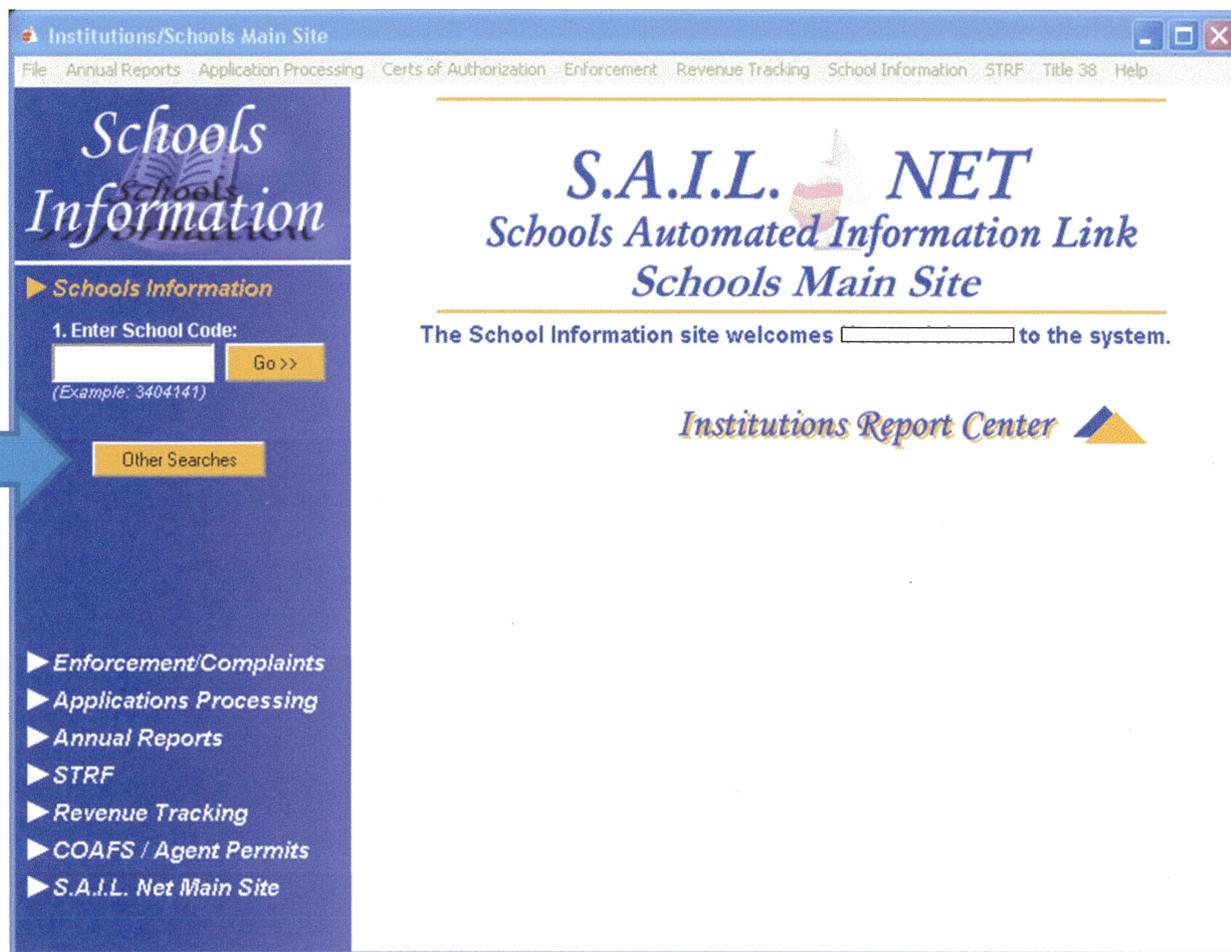
School Code Applications assigned to: Yvette Johnson
 School Name Application Type

Enter a School Code number: **Go >>**

School Code	School Name	App. #	Unit	Application Type	Application Status

- Schools Information
- Enforcement/Complaints
- Annual Report
- S.T.R.F.
- Revenue Tracking
- COAFS / Agent Permits

e. Is not a branch or satellite of an approved or exempt institution.



- Enter school code, if available, or click on the “Other Searches” button to search by institution name or physical city. Enter your search criterion.

Institutions/Schools Main Site

File Annual Reports Application Processing Certs of Authorization Enforcement Revenue Tracking School Information STRF Title 38 Help

Schools Information

S.A.I.L. NET

Schools Automated Information Link

Schools Main Site

The School Information site welcomes _____ to the system.

1. Enter School Code: **Go >>**
 (Example: 3404141)

Close 

Enforcement/Complaints
 Applications Processing
 Annual Reports
 STRF
 Revenue Tracking
 COAFS / Agent Permits
 S.A.I.L. Net Main Site

Search For Institutions By:
 (Select Only One)

Institution Name 'Your School Assignments'
 Physical City

'Institution Name' Search Parameter: **Go >>**

Print 'Detail' Search Results
 Print 'Quick View' Search Results

School Code	School Name	Original School Name	Site Type	Physical City	Current Status
<input type="text"/>					

Institution Searches Ownership Searches

- After entering the criterion, click the “go” button.

Institutions/Schools Main Site

File Annual Reports Application Processing Certs of Authorization Enforcement Revenue Tracking School Information STRF Title 38 Help

Schools Information

S.A.I.L. NET

Schools Automated Information Link

Schools Main Site

The School Information site welcomes to the system.

1. Enter School Code: **Go >>**
 (Example: 3404141)

Close Searches

Search For Institutions By:
 (Select Only One)

Institution Name 'Your School Assignments'
 Physical City

'Institution Name' Search Parameter: **Go >>**

Print 'Detail' Search Results
Print 'Quick View' Search Results

School Code	School Name	Original School Name	Site Type	Physical City	Current Status

Enforcement/Complaints
Applications Processing
Annual Reports
STRF
Revenue Tracking
COAFS / Agent Permits
S.A.I.L. Net Main Site

Institution Searches **Ownership Searches**

- A list of the institutions with the criterion you entered will be listed

Institutions/Schools Main Site

File Annual Reports Application Processing Certs of Authorization Enforcement Revenue Tracking School Information STRF Title 38 Help

Schools Information

S.A.I.L. NET

Schools Automated Information Link

Schools Main Site

The School Information site welcomes _____ to the system.

1. Enter School Code: **Go >>**
 (Example: 3404141)

Close Searches

► Enforcement
 ► Applications Processing
 ► Annual Reports
 ► STRF
 ► Revenue Tracking
 ► COAFS / Agent Permits
 ► S.A.I.L. Net Main Site

Search For Institutions By:
 (Select Only One)

Institution Name 'Your School Assignments'
 Physical City

'Institution Name' Search Parameter:
 Go >>

There are(is) 11 institution records found with search parameter: 'Federico'.

School Code	School Name	Original School Name	Site Type	Physical City	Current Status
[REDACTED]	[REDACTED]	[REDACTED] G	Main	Sacramento	Active
[REDACTED]	[REDACTED]	[REDACTED] F	Main	Bakersfield	Active - Refer to Specialist
[REDACTED]	[REDACTED]	[REDACTED]	Satellite	Bakersfield	Active
[REDACTED]	[REDACTED]	[REDACTED] IC	Main	Fresno	Active - Refer to Specialist
[REDACTED]	[REDACTED]	[REDACTED]	Main	Fresno	Active - Refer to Specialist
[REDACTED]	[REDACTED]	[REDACTED]	Satellite	Fresno	Active

Institution Searches Ownership Searches

- Click on the appropriate institution

General School Information For School Code [REDACTED]

File Schedule A Site Visit

S. A. I. L. Schools General Information

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Ma

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: Active Status Date: 9/7/2010 Site Type: Main School Code: [REDACTED]
(When the current status changed.) **AUDIT** Institution Code: [REDACTED] **AUDIT**

School/Institution Name: [REDACTED] **AUDIT**

Title IV Funding? OPE ID: [REDACTED] Addressing Preference: [REDACTED]

School Physical Address: [REDACTED] **AUDIT** School Mailing Address: [REDACTED]

County: Sacramento Phone Number: [REDACTED] Fax Number: [REDACTED]

Accrediting Body/Agency: (> 2 please reflect in comments) NACCAS - National Accrediting Commission of Cosn Web Address (URL Address): www.icpla.edu Assigned Bureau Staff: [REDACTED] Date Assign: [REDACTED]

Contact Info | Ownership | Custodian | **Branches/Satellites** | Site Visits

Approval | Registrations | Religious Exemption | Other Exemptions | Programs | Enforcement | Revenue Tracking | Applications

Institutional Approvals (past and present) for Institution Code # 3401271

Approval ID	Approval Status	Approval Date	Expiration Date	Temp Expiration Date *	Associated App	Active?
▶ 21965	Accredited Institution Approval	5/12/2012	1/31/2016		24590	Yes
20259	Full Approval	12/21/2005	6/28/2012		18630	No
18874	Full Approval	6/30/2001	6/29/2005		6156	No
16749	Full Approval	7/1/1995	6/30/2001			No
13995	Full Approval	6/1/1981	7/1/1995			No

* 'Temp Expiration Date' only valid if the Approval Status is 'Temporary Approval'

- Click on the "Branches/Satellites" tab

General School Information For School Code [REDACTED]

File Schedule A Site Visit

S. A. I. L. Schools
General Information

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Main

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: Active Status Date: 9/7/2010 Site Type: Main School Code: [REDACTED]
 Institution Code: [REDACTED]

School/Institution Name: [REDACTED] **AUDIT**

Title IV Funding? OPE ID: [REDACTED] Addressing Preference:

School Physical Address: [REDACTED] **AUDIT** School Mailing Address: [REDACTED]

County: Sacramento Phone Number: [REDACTED] Fax Number: [REDACTED]

Accrediting Body/Agency: (> 2 please reflect in comments) Assigned Bureau Staff: [REDACTED] Date Assigned: [REDACTED]

NACCAS - National Accrediting Commission of Cosmetology Web Address (URL Address): www.icpla.edu

Approval Registrations Religious Exemption Other Exemptions Programs Enforcement Revenue Tracking Applications
 Contact Info Ownership Custodian Agent for Process Branches/Satellites Site Visits

Branch and Satellite sites in the structure of Institution Code # 3401271

School Code	Institution Code	School Name	Location Type	Current Status	Physical City
[REDACTED]	[REDACTED]	[REDACTED]	Main	Active	Sacramento

View Institution Structure Print Institution Structure (Graphical) Print Institution Structure (Text Only)

- A list of all approved associated branches and satellites appears
- Verify that the institution in question is not an approved branch or satellite location.

B. SEARCH FOR EVIDENCE.

- (1) Search the internet for the institution and owner. Look for evidence that supports that the institution has a physical presence in California.
- (2) Use information gleaned from complaints, tips, and other sources to provide direction on where to look for evidence that the institution has a physical presence in California.
- (3) If evidence points to a physical presence in California, identify a mailing address.

California Education Code (CEC) § 94858 defines a private postsecondary educational institution as a private entity with a physical presence in this state that offers postsecondary education to the public for an institutional charge.

C. RESEARCH ACCREDITING AGENCIES.

- (1) Perform the following research to make sure the institution is not accredited by a regional accrediting agency that is approved by the U.S. Department of Education.
 - a. Go to [REDACTED] and perform a search for the institution.
 - b. If the institution is identified as accredited by WASC Junior or WASC Senior, go to the appropriate WASC web site to confirm the accreditation is current. If the accreditation is current, the institution is exempt from Bureau jurisdiction.
 - c. If the institution is identified as accredited by a Department of Education approved regional accreditor other than WASC Junior or WASC Senior, go to the accreditor's web site to confirm the accreditation is current.

CEC § 94874(i) provides that an institution accredited by either of the following two accrediting agencies is exempt from Bureau jurisdiction: (1) Western Association of Schools and Colleges (WASC), the Accrediting Commission for Senior Colleges and Universities; or (2) WASC Accrediting Commission for Community and Junior Colleges.

CEC § 94874.1 provides that an institution accredited by a regional accrediting agency (other than WASC Senior or WASC Junior) that is recognized by the US Department of Education is exempt, except for Student Tuition Recovery Fund requirements.

2. DETERMINE IF THE ENTITY IS REQUIRED TO HAVE BUREAU APPROVAL

CEC § 94886 prohibits a person from opening, conducting or doing business as a private postsecondary educational institution in California without an approval to operate, unless the institution is exempt from the requirement to obtain an approval to operate from the bureau.

- (1) Does the entity meet the definition of a "private postsecondary institution as identified in CEC §94858?
 - a. Is the institution a private (non-public) entity?
 - b. Does the institution have a physical presence in California?
 - i. Are there administrative offices, teaching location, etc. in California?
- (2) If the institution meets the definition of a private postsecondary educational institution, verify if the institution is covered by one of the exemptions outlined in CEC § 94874
 - a. If the institution does meet an exemption criterion, no further action is required.

- (3) If the institution meets the definition of a private postsecondary educational institution, but does not meet any of the exemptions outlined in CEC § 94874 verify if the institution is exempt under CEC 94874.1, as a Non-WASC Regionally Accredited Institution. Research the United States Department of Education’s Database of Accredited Postsecondary Institutions and Programs at 

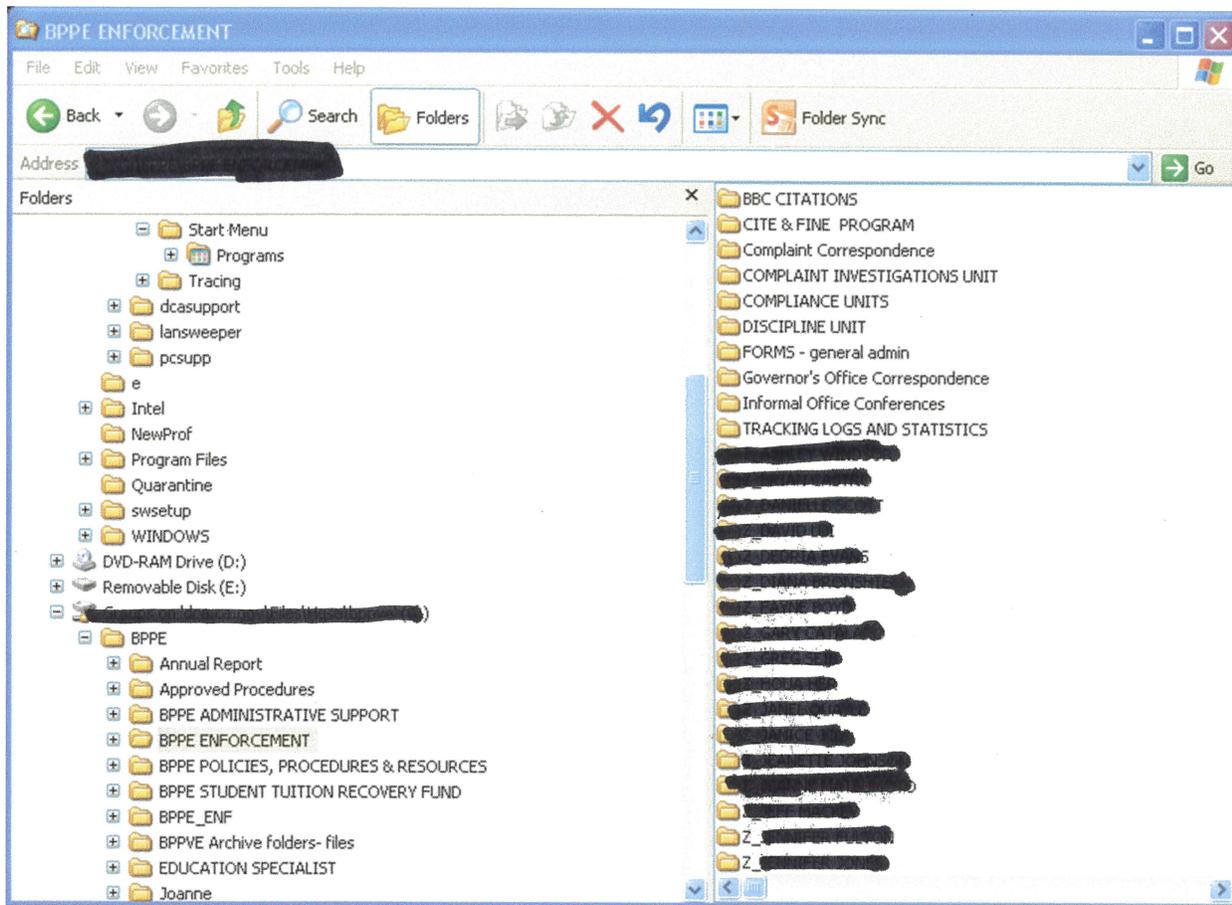
3. RECOMMEND OPERATING EDUCATIONAL INSTITUTION WITHOUT PROPER APPROVAL LETTER.

If the CI analyst determines the institution appears to be operating without Bureau approval and the institution is not exempt from Bureau laws, the CI analyst writes a summary and recommends the matter to the manager for issuance of an Operating Educational Institution without Proper Approval Letter (Letter).

4. PREPARE, MAIL, AND FILE THE LETTER.

A. PREPARE THE LETTER.

- (1) The CI analyst completes the template letter and performs a “save as,” saving the completed letter into the appropriate CI analyst Z_ subfolder.



- a. Use the template OA Letter and the required enclosure located in **BPPE\BPPE ENFORCEMENT\COMPLAINT INVESTIGATIONS UNIT\LETTER TEMPLATES\LETTERS TO SCHOOLS**. (Attachment A)
- b. If there is more than one address for the institution, the CI analyst includes all known addresses in the letter.
- c. The “failure to respond” date should be 14 days from the date of the letter, or the next weekday after 14 days.
- d. The CI analyst is the listed contact person and also signs the letter.
- e. Include a copy of the “Categories of Exempt Institutions” as an enclosure for the letter (Attachment B)
- f. cc: the Closed Schools Unit on the letter

B. MAIL / ISSUE THE LETTER.

- (1) Prepare certified, return-receipt documents for each address listed in the letter.
 - a. Write your name or initials and the unit name on the return receipt document so that the card will be returned to the appropriate person

- (2) Prepare two envelopes for each address listed in the letter. One envelope is for regular postal service and the second envelope is for certified, return-receipt service.
- (3) After signing the letter, make copies of the letter and letter enclosure.
- (4) Place the original letter with enclosure in the certified, return-receipt envelope. Copies may be inserted into the regular mail envelope and envelopes for any additional known addresses.
- (5) Attach the certified and return receipt documents to the appropriate envelope(s).
- (6) Stamp or handwrite the Enforcement Index Code 6802 under the Bureau's return address on the envelope
- (7) Place all envelopes in the Bureau outgoing mail basket.

C. FILE A COPY OF THE LETTER.

A copy of the Letter shall be retained in the case file

- (1) Attach the return-receipt document to a blank 8.5 X 11 paper. Staple this page as the last page to the case file's copy of the letter and enclosure.
- (2) Place into the case file, under the "Correspondence" cover sheet, on the right hand side of the file.
- (3) Provide a copy of the Letter to the Closed Schools Unit

5. CALENDAR AND FOLLOW-UP.

After mailing the Letter, the CI analyst calendars the matter for 20 days.

A. INSTITUTION OWNER RESPONDS.

- (1) Owner believes the institution is exempt.
 - a. CI analyst requests the owner to submit explanation and documentation that supports the institution meets the minimum requirements for an exemption category as outlined in CEC § 94874 or §94874.1.
 - b. CI analyst reviews documentation received from the owner.
 - c. CI analyst writes an Investigation Report (**Attachment C**) that includes:
 - i. The exemption category the owner states the institution meets
 - ii. Documents received
 - iii. A written analyses of the case, including findings of the investigation
 1. If the findings indicate the institution is exempt, recommend case closure, no further action required.
 2. If the findings indicate the institution does not meet an exempt category, recommend the institution be referred for citation.
 - a. Complete an Enforcement Referral Form (**Attachment D**)

d. CI analyst submits the Investigation Report and Enforcement Referral for manager approval.

(2) Owner informs CI analyst that an application will be filed with the Bureau.

- a. CI analyst instructs the owner that the institution may not continue to conduct business. Advise owner that a citation up to \$50,000 will be issued if there is evidence to support the operation of the institution. This may be confirmed through a site visit.
- b. CI analyst directs the owner to the Bureau's website at [REDACTED] to obtain a copy of the Closed School Form, or offer to mail one.
- c. Send an email to the Closed School Unit informing them of the institution's status
- d. Follow up with the Closed School Unit to determine if the institution has followed the proper school closure process
- e. Check SAIL and follow up with the Licensing Unit to determine if the institution has submitted an application.

B. INSTITUTION OWNER FAILS TO RESPOND.

If the owner does not respond within 14 days, the CI analyst performs an investigation to confirm the institution is currently operating.

- a. CI analyst prepares an Investigation Report and Enforcement Referral Form recommending the institution be referred for a citation for continuing to operate.
- b. CI analyst submits Investigation Report and Referral for manager approval
- c. If there is no evidence the school is operating or has a presence in California, the CI analyst writes an investigations report recommending case closure

Upon approval of the Investigation Report and Enforcement Referral Form, the case is transferred to the Citation Unit.

C. TRANSFER OF CASE

- a. CI analyst completes a "Complaint Case Action Request Form (Attachment E) for management approval
- b. When approved by management the CI analyst provides the complete case file, with the "Complaint Case Action Request Form" to the support staff to transfer the case in SAIL and on the Complaint Case Aging Log to the Citation Unit.

Once transferred, the complaint case will become a citation case and is no longer considered an active complaint.



State and Consumer Services Agency – Governor Edmund G. Brown Jr

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



REGULAR AND CERTIFIED MAIL

June 27, 2012

Owner Name
Institution Name
School Code
Address
City, State Zip

Subject: Institution Name
Operating Educational Institution without Proper Approval

Dear Owner Name:

The Bureau for Private Postsecondary Education (“Bureau”) regulates California’s private postsecondary educational institutions. It is the Bureau’s mandate to uphold and enforce the Private Postsecondary Education Act of 2009 (“the Act”) and corresponding regulations. The text of the Act and corresponding regulations is available on the Bureau’s website at www.bppe.ca.gov.

As of the date of this letter, the Bureau has not received an Application for Approval to Operate Accredited Institution from Institution Name. As the owner of Institution Name you are in violation of the Act section 94886.

Statutory Authority:

The Private Postsecondary Education Act of 2009 (the Act) provides in relevant part:

“...a person shall not open, conduct, or do business as a private postsecondary educational institution in this state without obtaining an approval to operate under this chapter.” (Ed. Code § 94886)

The Act provides in relevant part:

“The following violations of this chapter are public offenses: (a) Knowingly operate a private postsecondary institution without an approval to operate is an infraction subject to the procedures described in Sections 19.6 and 19.7 of the Penal Code.” (Ed. Code § 94943(a))

The Act provides in relevant part:

Owner Name

[Click here to enter a date](#)

Page 2

“Notwithstanding any other provision of the law, the Bureau shall cite any person, and that person shall be subject to a fine not to exceed fifty thousand dollars (\$50,000), for operating an institution without proper approval to operate issued by the bureau pursuant to this chapter.” (Ed. Code § 94944)

The Institution Name has not been issued an Approval to Operate by the Bureau. Therefore, the Bureau hereby orders that you cease operating as a private postsecondary educational institution and submit evidence of compliance to the Bureau within 14 days of the date of this order. This means you must stop enrolling students, and cease all instructional services, advertising (including Web sites), programs, and/or operations. Operation without Bureau approval will subject you to a \$50,000.00 fine under section 94886 of the Act.

In addition, if the Institution Name currently has enrolled students, you must immediately contact the Bureau’s Closed School Unit pursuant to Title 5, CCR § 76240 in order to notify the Bureau of your closure plans. The Closed School Unit’s telephone number is (916) 431-6931. Note additionally that pursuant to California Education Code section 94902(b), an enrollment agreement is not enforceable unless at the time of the execution of the enrollment agreement the institution held a valid approval to operate.

If you have any questions regarding this Order of Abatement, please contact Title, Analyst Name by phone at (916) Phone Number or by e-mail at E-mail Address

Sincerely,

Connie Bouvia
Enforcement Analyst

:analyst initials

cc: Closed School Unit, Licensing Unit



Private Postsecondary Education Act of 2009
(California Education Code, Title 3, Division 10, Part 59, Chapter 8)

Article 4. Exemptions

94874. Categories of Exempt Institutions

The following are exempt from this chapter:

- (a) An institution that offers solely avocational or recreational educational programs.
- (b) An institution offering educational programs sponsored by a bona fide trade, business, professional, or fraternal organization, solely for that organization's membership.
- (c) A postsecondary educational institution established, operated, and governed by the federal government or by this state or its political subdivisions.
- (d) An institution offering either of the following:
 - (1) Test preparation for examinations required for admission to a postsecondary educational institution.
 - (2) Continuing education or license examination preparation, if the institution or the program is approved, certified, or sponsored by any of the following:
 - (A) A government agency, other than the bureau, that licenses persons in a particular profession, occupation, trade, or career field.
 - (B) A state-recognized professional licensing body, such as the State Bar of California, that licenses persons in a particular profession, occupation, trade, or career field.
 - (C) A bona fide trade, business, or professional organization.
- (e) (1) An institution owned, controlled, and operated and maintained by a religious organization lawfully operating as a nonprofit religious corporation pursuant to Part 4 (commencing with Section 9110) of Division 2 of Title 1 of the Corporations Code, that meets all of the following requirements:
 - (A) The instruction is limited to the principles of that religious organization, or to courses offered pursuant to Section 2789 of Business and Professions Code.
 - (B) The diploma or degree is limited to evidence of completion of that education.
 - (2) An institution operating under this subdivision shall offer degrees and diplomas only in the beliefs and practices of the church, religious denomination, or religious organization.
 - (3) An institution operating under this subdivision shall not award degrees in any area of physical science.
 - (4) Any degree or diploma granted under this subdivision shall contain on its face, in the written description of the title of the degree being conferred, a reference to the theological or religious aspect of the degree's subject area.
 - (5) A degree awarded under this subdivision shall reflect the nature of the degree title, such as "associate of religious studies," "bachelor of religious studies," "master of divinity," or "doctor of divinity."
- (f) An institution that does not award degrees and that solely provides educational programs for total charges of two thousand five hundred dollars (\$2,500) or less when no part of the total charges is paid from state or federal student financial aid programs. The bureau may adjust this cost threshold based upon the California Consumer Price Index and post notification of the adjusted cost threshold on its Internet Web site, as the bureau determines, through the promulgation of regulations, that the adjustment is consistent with the intent of this chapter.
- (g) A law school that is accredited by the Council of the Section of Legal Education and Admissions to the Bar of the American Bar Association or a law school or law study program that is subject to the approval, regulation, and oversight of the Committee of Bar Examiners, pursuant to Sections 6046.7 and 6060.7 of the Business and Professions Code.

- (h) A nonprofit public benefit corporation that satisfies all of the following criteria:
- (1) Is qualified under Section 501(c)(3) of the United States Internal Revenue Code.
 - (2) Is organized specifically to provide workforce development or rehabilitation services.
 - (3) Is accredited by an accrediting organization for workforce development or rehabilitation services recognized by the Department of Rehabilitation.
- (i) An institution that is accredited by the Accrediting Commission for Senior Colleges and Universities, Western Association of Schools and Colleges, or the Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges.
- (j) An institution that satisfies all of the following criteria:
- (1) The institution has been accredited, for at least 10 years, by an accrediting agency that is recognized by the United States Department of Education.
 - (2) The institution has operated continuously in this state for at least 25 years.
 - (3) During its existence, the institution has not filed for bankruptcy protection pursuant to Title 11 of the United States Code.
 - (4) The institution's cohort default rate on guaranteed student loans does not exceed 10 percent for the most recent three years, as published by the United States Department of Education.
 - (5) The institution maintains a composite score of 1.5 or greater on its equity, primary reserve, and net income ratios, as provided under Section 668.172 of Title 34 of the Code of Federal Regulations.
 - (6) The institution provides a pro rata refund of unearned institutional charges to students who complete 75 percent or less of the period of attendance.
 - (7) The institution provides to all students the right to cancel the enrollment agreement and obtain a refund of charges paid through attendance at the second class session, or the 14th day after enrollment, whichever is later.
 - (8) The institution submits to the bureau copies of its most recent IRS Form 990, the institution's Integrated Postsecondary Education Data System Report of the United States Department of Education, and its accumulated default rate.
 - (9) The institution is incorporated and lawfully operates as a nonprofit public benefit corporation pursuant to Part 2 (commencing with Section 5110) of Division 2 of Title 1 of the Corporations Code and is not managed or administered by an entity for profit.

94874.1. Non-WASC Regional Accreditation

- (a) An institution that is accredited by a regional accrediting agency that is recognized by the United States Department of Education, and is not an agency described in subdivision (i) of Section 94874, is exempt from this chapter, except Article 14 (commencing with Section 94923).
- (b) This section shall remain in effect only until January 1, 2016, and as of that date is repealed, unless a later enacted statute, that is enacted before January 1, 2016, deletes or extends that date.

94874.5. Limitation to Exemption

Notwithstanding Sections 94874 and 94874.1, an institution that is otherwise exempt from this chapter shall comply with the requirements of Section 94927.5.

94874.7. Verification of Exemption

The bureau shall establish, by regulation, a process pursuant to which an institution that is exempt from this chapter may request, and obtain, from the bureau verification that the institution is exempt. The bureau shall establish a reasonable fee to reimburse the bureau's costs associated with the implementation of this section.

**BUREAU FOR PRIVATE POSTSECONDARY EDUCATION
2535 Capitol Oaks Drive, Suite 400, Sacramento, CA 95833
(916) 431-6959**

INVESTIGATION REPORT

Complaint Number:
Investigator:
Report Date:

COMPLAINANT:

Complaint Name (First and Last):	Complainant Phone Number:
Complainant Address:	Complainant Fax Number:
	Complainant Email Address:

RESPONDENT:

Owner's Name:	Owner's Telephone Number
Owner's Address of Record:	Owner's Email Address:
Institution Name:	Institution Code:
Institution Address:	School Code:
	Institution Telephone Number:
	Institution Fax Number:
	Institution Website and Email Address
Institution Approval Date:	Institution Expiration Date:
Type of Approval:	Bureau Approved Programs:
Pending Applications:	

SYNOPSIS**ALLEGATIONS**

California Education Code, Title 3, Division 10, Part 59, Chapter 8:

Title 5, California Code of Regulations, Division 7.5:

DEFINITIONS

INVESTIGATION NARRATIVE

EXHIBITS

1. Consumer Complaint
2. License certification

FINDINGS

RECOMMENDATION

ATTACHMENTS

WITNESSES

NAME, TITLE
ADDRESS
TELEPHONE #
Can testify to the details of the investigation

1. NAME, TITLE
ADDRESS
TELEPHONE #
Can testify to

Prepared by: _____ Date: _____
Analyst Name, Title

Approved by: _____ Date: _____
Manager Name, Title



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



ENFORCEMENT REFERRAL

Enforcement Referral Date: **MM/DD/YY**
 Case No.:

Institution Name:		Institution Telephone:	
Institution Code:		Institution Address:	
Owner(s) Name:			

Analyst's Name:	
Approving Manager Name and Signature:	

Unit Referred From:	<input type="checkbox"/> Admin <input type="checkbox"/> Complaint Investigations <input type="checkbox"/> Compliance <input type="checkbox"/> Education Specialist <input type="checkbox"/> Licensing
---------------------	---

1. Reason for Referral:

2. Code Section(s) Violated: *(Describe how the school is in violation of each code section. Include any details regarding the nature and facts of the violation.)*

#	CEC/ CCR (include Subsection(s))	Description of Violation

3. Evidence: *(Provide supporting evidence that the school is in violation of the above mentioned code section(s). Provide copies of evidence as attachments or flag in the file where I can obtain the evidence.)*

#	Name of Document and Brief Description

Note: The “#” columns in sections 2 and 3 of this document should correspond with each other.

For Discipline Manager Use Only:

Refer to: <input type="checkbox"/> Desk Investigator <input type="checkbox"/> (Unlicensed) Desk Investigator <input type="checkbox"/> Field Investigator <input type="checkbox"/> Citation <input type="checkbox"/> Formal Discipline	
Complaint Investigations/ Discipline Manager Approval Signature:	

Complaint Case Action Request Form

Analyst: _____ **Date Submitted:** _____
Complaint #: _____
School Name: _____
School Code: _____

Action Requested

Close Complaint

Date Closed in SAIL: _____

SAIL Closure Reason: _____

**Transfer
Complaint:**

From: _____

To: **Desk Investigation**
 Field Investigation
 Citation
 Discipline

Reason for Transfer: _____

Action Completed By:	Date Action Completed:
-----------------------------	-------------------------------

Title: Complaint Case Handling	Supersedes: 2013-0032 (May 3, 2013)	Procedure #: 2013-0032
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 28
Issue Date: April 30, 2014	Approved By: Joanne Wenzel, Bureau Chief Bureau for Private Postsecondary Education	

Policy: The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to place an institution on probation or the option to suspend or revoke an institution’s approval to operate for:

1. Obtaining an approval to operate by fraud.
2. A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students.

Purpose: Handling complaints is a priority of the Bureau and an important function of the Enforcement Unit. This process outlines the process for complaint handling.

Definitions:

Approval to Operate: the authorization to offer to the public and to provide postsecondary educational programs

Approved to Operate: an institution has received authorization to offer postsecondary educational programs to the public.

Institution: any private postsecondary educational school, including its branch campuses and satellite locations.

Owner: an individual in the case of a sole proprietorship, partners in a partnership, members in limited liability company, or shareholders in a corporation.

Ownership: legal or equitable interest in an institution, including ownership of assets or stock

Postsecondary education: a formal institutional educational program whose curriculum is designed primarily for students who have completed or terminated their secondary education or are beyond the compulsory age of secondary education, including programs whose purpose is academic, vocational, or continuing professional education

Private Postsecondary Educational Institution: a private entity with a physical presence in this state that offers postsecondary education to the public for an institutional charge.

Offer to the Public: advertise, publicize, solicit or recruit

Operate: establish, keep, or maintain any facility or location in this state where, or from which or through which, postsecondary educational programs are provided.

Productivity Benchmark: (Include here the amount of staff time to complete this procedure and if some aspects of the procedure are not under our control (e.g. waiting for response from school), estimate the typical timeframe before hearing back to show the total elapsed time of the procedure.)

ENFORCEMENT SECTION

COMPLAINT INVESTIGATIONS PROCEDURES

COMPLAINT CASE HANDLING

(1) COMPLAINT PRIORITIZATION

Upon receipt of a new complaint, the Complaint Investigations (CI) analyst prioritizes their case workload according to:

Urgent (Highest Priority)

- Allegations that indicate an immediate danger to the public health, safety or welfare
- Imminent or on-going criminal activity
- Unlicensed activity posing an immediate danger to the public health, safety or welfare
- Aiding and abetting unlicensed activity posing an immediate danger to the public health, safety or welfare
- Multiple or singular complaints of fraud that potentially involve a substantial number of people or a substantial amount of money
- Arrests or convictions substantially related to the operation of the institution

High

- Significant financial harm to a person
- When evidence will like be destroyed or unavailable
- When complainant/victim may not be available later as a witness
- Unlicensed activity not posing an immediate danger to the public, health safety or welfare
- Aiding and abetting unlicensed activity, not posing an immediate danger to the public, health, safety or welfare
- Complaints with multiple prior complaints
- Complaints about schools on probation
- Fraud

Routine

- Quality of service
- Advertising
- Record keeping violations
- Non-compliance with a citation

The priority level of the complaint is indicated in the complaint file and on the Complaint Case Aging Log in the “Status” column.

It is the assigned CI analyst’s responsibility to adjust their caseload with regard to complaint priority. If you need assistance in determining how to adjust your caseload request a meeting with your manager.

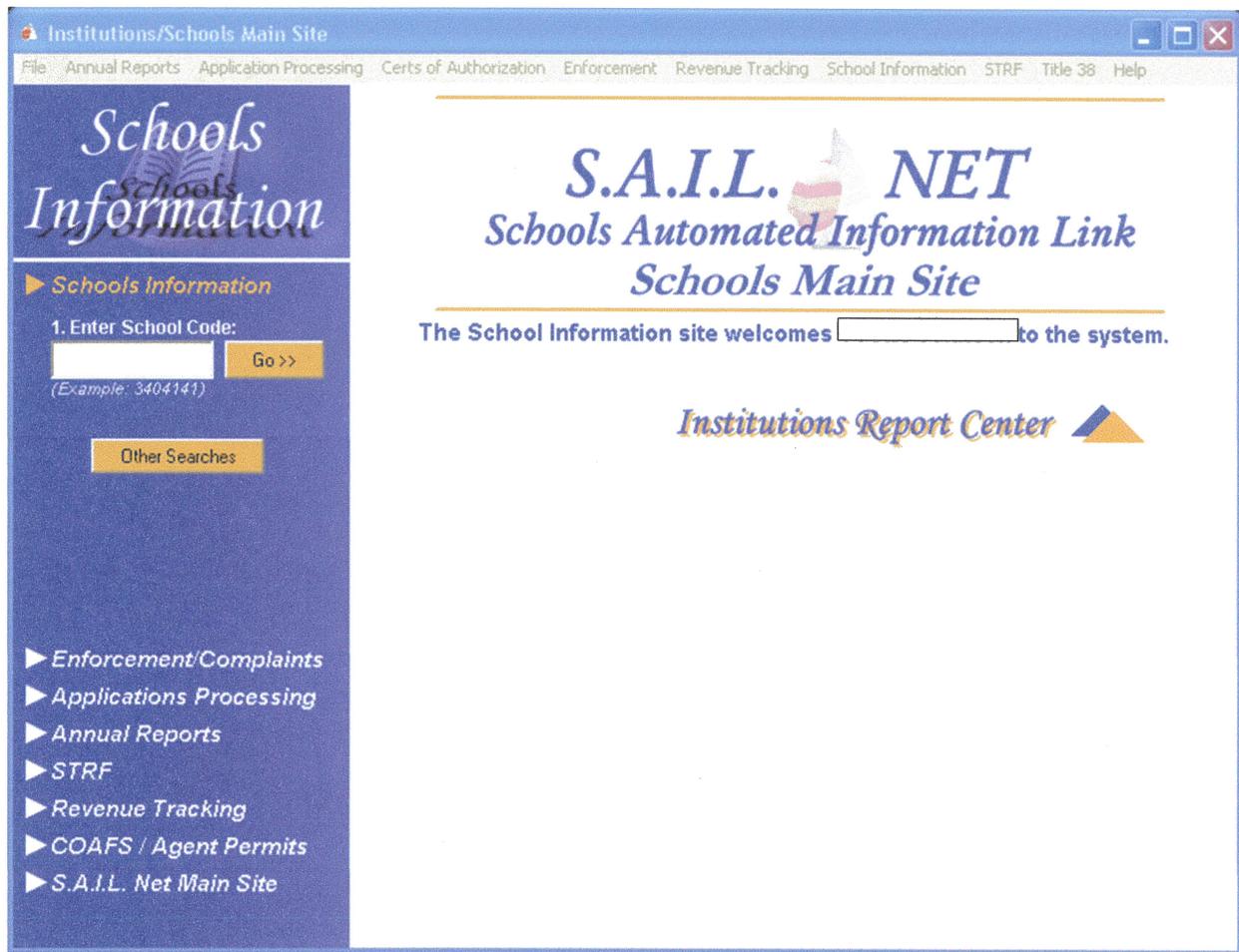
(2) COMPLAINT CASE FILE REVIEW AND PROCESSING

Each complaint case file contains a “Case Activity Tracking Log” (Attachment A). The CI analyst is responsible for maintaining the “Case Activity Tracking Log” and recording all activities associated with the investigation of the complaint case and how long it took to conduct the activity

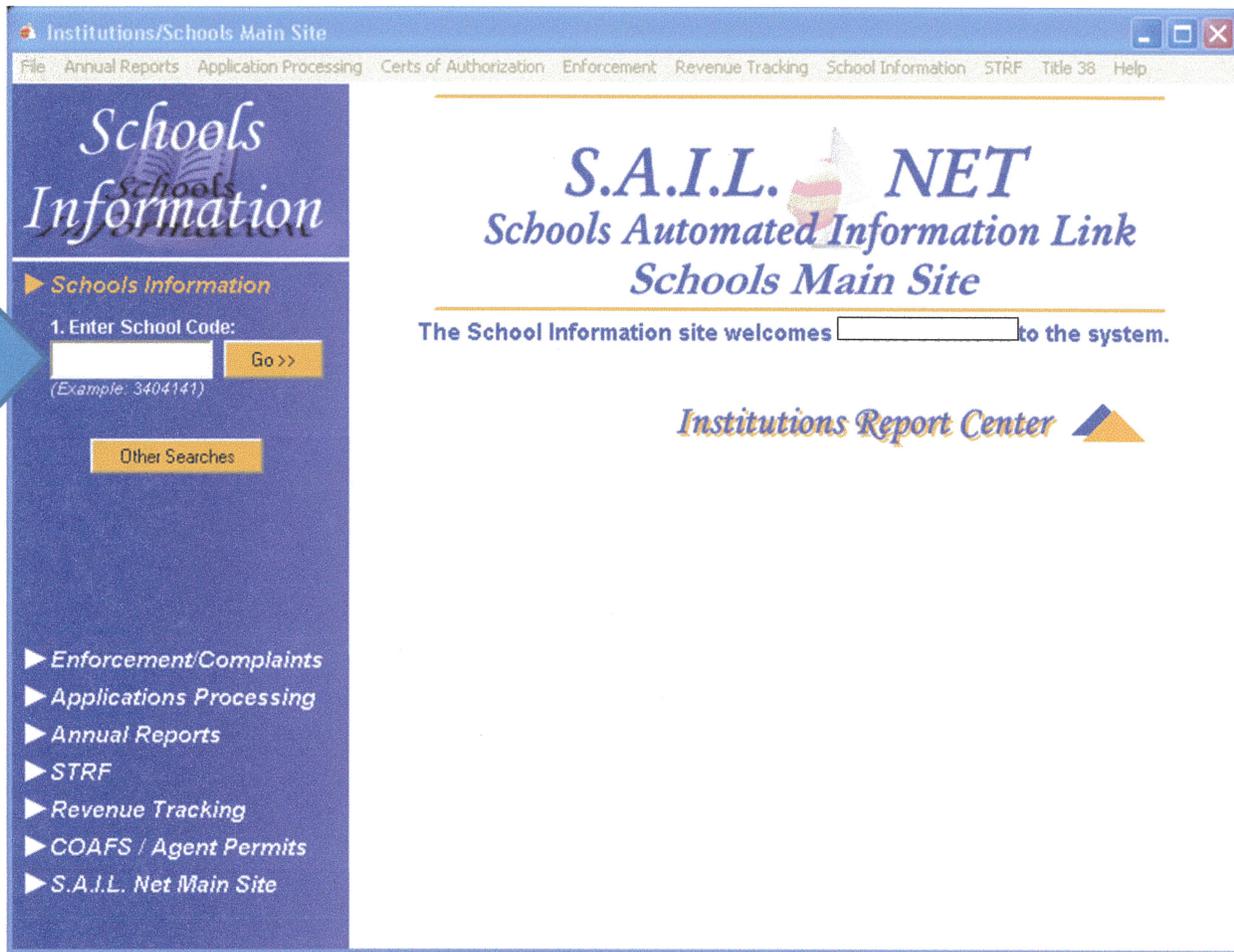
(3) REVIEW AND PROCESS THE COMPLAINT

1. THOROUGHLY READ THE COMPLAINT

- (1) The CI analyst reviews the complaint
- (2) The CI analyst checks the institution’s status in the Schools Automated Information Link (SAIL) Database.



All institutions with an approval to operate are issued a School Code.



- Enter the School Code and press the click the “Go” button

General School Information For School Code: []

File Schedule A Site Visit

S. A. I. L. Schools

General Information

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Main

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: Active Status Date: 9/7/2010 Site Type: Main School Code: []
(When the current status changed.) AUDIT Institution Code: []

School/Institution Name: [] AUDIT

Title IV Funding? OPE ID: [] Addressing Preference: []

School Physical Address: [] AUDIT School Mailing Address: []
 Sacramento, CA 95834 Sacramento, CA 95834
 County: Sacramento Phone Number: (916) [] Fax Number: (916) []
 Accrediting Body/Agency: (> 2 please reflect in comments) Assigned Bureau Staff: [] Date Assigned: []
 NACCAS - National Accrediting Commission of Cosn Web Address (URL Address): []

Contact Info | Ownership | Custodian | Agent for [] | Branches/Satellites | Site Visits
 Approval | Registrations | Religious Exemption | Other Exemptions | Enforcement | Revenue Tracking | Applications

Institutional Approvals (past and present) for institution Code # 3401271

Approval ID	Approval Status	Approval Date	Expiration Date	Temp Expiration Date *	Associated App	Active?
[]	Accredited Institution Approval	5/12/2012	1/31/2016		[]	Yes
[]	Full Approval	12/21/2005	6/28/2012		[]	No
[]	Full Approval	6/30/2001	6/29/2005		[]	No
[]	Full Approval	7/1/1995	6/30/2001		[]	No
[]	Full Approval	6/1/1981	7/1/1995		[]	No

* 'Temp Expiration Date' only valid if the Approval Status is 'Temporary Approval'

a. What is the School Status?

- a. Active
- b. Active Refer to Specialist
- c. Closed
- d. Exempt
- e. Expired Approval
- f. Religious Exempt
- g. Revoked
- h. Surrendered Approval
- i. Suspended
- j. Term. Denial

b. What is the Approval Status?

- a. Accredited Institution Approval
- b. Full Approval

- c. What is the Approval Expiration Date?
- d. From what location(s) is the institution approved to operate?
 - a. Also refer to the Branches/Satellites tab for additional locations

(3) The CI analyst searches the United States Department of Education, “The Database of Accredited Postsecondary Institutions and Programs” to determine institutional accreditation (if any). [REDACTED]



(4) The CI analyst writes file notes, including:

- a. Institution’s approval and accreditation status
- b. Approved educational programs. (the approved educational programs are found in SAIL)

General School Information For School Code # []

File Schedule A Site Visit

S. A. I. L. Schools' General Information

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Main

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: Active Status Date: 9/7/2010 Site Type: Main School Code: []
(When the current status changed.) **AUDIT** Institution Code: [] **AUDIT**

School/Institution Name: [] **AUDIT**

Title IV Funding? OPE ID: [] Addressing Preference: []

School Physical Address: [] **AUDIT** School Mailing Address: []

Sacramento, CA 95834 Sacramento, CA 95834
 County: Sacramento Phone Number: (916) [] Fax Number: (916) []

Accrediting Body/Agency: (> 2 please reflect in comments) NACCAS - National Accrediting Commission of Cost Web Address (URL Address): [] Assigned Bureau Staff: [] Date Assigned: []

Contact Info | Ownership | Custodian | Agent for Process | Branches/Satellites | Site Visits
 Approval | Registrations | Religious Exempt | **Programs** | Enforcement | Revenue Tracking | Applications

Institutional Approvals (past & present) for Institution Code # 3401271

Approval ID	Approval Status	Approval Date	Expiration Date	Temp Expiration Date *	Associated App	Active?
[]	Accredited Institution Approval	5/12/2012	1/31/2016		[]	Yes
[]	Full Approval	12/21/2005	6/28/2012		[]	No
[]	Full Approval	6/30/2001	6/29/2005		[]	No
[]	Full Approval	7/1/1995	6/30/2001			No
[]	Full Approval	6/1/1981	7/1/1995			No

* Temp Expiration Date* only valid if the Approval Status is 'Temporary Approval'

- From the "General School Information For School Code page, click on the "Programs" tab

General School Information For School Code # [redacted]

File - Schedule A Site Visit

S. A. I. L. Schools' General Information

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Main

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: Active Status Date: 9/7/2010 Site Type: Main School Code: [redacted] Institution Code: [redacted] **AUDIT**

School/Institution Name: [redacted] **AUDIT**

Title IV Funding? OPE ID: [redacted] Addressing Preference: [redacted]

School Physical Address: [redacted] **AUDIT** School Mailing Address: [redacted]

Sacramento, CA 95834 Sacramento, CA 95834

County: Sacramento Phone Number: (916) [redacted] Fax Number: (916) [redacted]

Accrediting Body/Agency: (> 2 please reflect in comments) Web Address (URL Address): [redacted] Assigned Bureau Staff: [redacted] Date Assigned: [redacted]

NACCAS - National Accrediting Commission of Cosn

Contact Info Ownership Custodian Agent for Process Branches/Satellites Site Visits

Approval Registrations Religious Exemption Other Exemptions Programs Enforcement Revenue Tracking Applications

Programs/Courses for Institution Code # 3401271							
Program Title	Program Type	Program Length (Hours or Lessons)	# of Units	Subject to MVV?	Approved On	Discontinued On	
▶ Barber	Non-Degree	1500		No	5/7/2013		
Barber Crossover	Non-Degree	400		No	6/27/2013		
Cosmetology	Non-Degree	1600		No	3/1/1992		
Esthetician	Non-Degree	600		No	3/1/1992		
Massage Therapy - 24 Semester Credits	Non-Degree		24	No	8/10/2010		

- The Programs tab lists all of the educational programs the institution is approved to provide. (when reviewing the complaint, ensure the program in which the student is enrolled is approved by the Bureau)

c. Complainant's allegations

- I. The allegations must also be entered in SAIL

Institutions/Schools Main Site

File Annual Reports Application Processing Certs of Authorization Enforcement Revenue Tracking School Information STRF Title 38 Help

Schools Information

S.A.I.L. NET

Schools Automated Information Link
Schools Main Site

The School Information site welcomes to the system.

Institutions Report Center

▶ Schools Information

1. Enter School Code:

Go >>

(Example: 3404141)

Other Searches

- ▶ Enforcement/Complaints
- ▶ Applications Processing
- ▶ Annual Reports
- ▶ STRF
- ▶ Revenue Tracking
- ▶ COAFS / Agent Permits
- ▶ S.A.I.L. Net Main Site

- From the main School Information Page, click on “Enforcement/Complaints”

Enforcement/Complaints - Main Site

File Annual Reports Application Processing Certs Of Authorization Enforcement Revenue Tracking School Information STRF Title 38 Help

Enforcement/Complaints

S.A.I.L. NET

Schools Automated Information Link

Enforcement Main Site

The Enforcement and Compliance Site welcomes

Enforcement Staff Mailbox

Enforcement Staff Current Workload

Add An Enforcement File Manually

Enforcement Report Center

1. Enter Complaint Number: Go >>
 (Example: 991088)

2. Search by School Code: Go >>
 (Example: 1928871)

3. Search by Institution Name: Go >>
 (Example: Elite Progressive)

4. Search by Complainant Name: Go >>

Schools Information

Applications Processing

Annual Reports

S.T.R.F.

Revenue Tracking

COAFS / Agent Permits

S.A.I.L. Net Main Site

- The complaint record can be accessed by entering:
 1. Complaint Number
 2. School Code
 3. Institution Name
 4. Complainant Name
- Enter the search criterion

Enforcement File Details - All Access

File Institutions Enforcement Help

S. A. I. L. *Enforcement Files General Information*

Complainant Information:
 First: [] Last: []
 Anonymous Name: []
 Address: [] Gender (M or F): []
 Phone Number: []
 Attorney Retained? (Y or N) []

General Complaint Information:
Enforcement File Type: [Complaint]
Current Staff: [BPPE Enforcement]
Date Received: 6/19/12
Date Closed: 4/10/13

Closure Information:
 BPPVE Section # Violated: []
 Amount Refunded: []

Subject School or UnApproved/UnRegistered Facility:
 School Code: [] Complaint Number: []
 Violator School Name: []
 Violator School Contact: []
 Violator School Address: []
 Violator School Phone #: [] [] Ext. []

Allegations Against Subject School or Facility:
 Allegation #1: []
 Allegation #2: []
 Allegation #3: []

Basis for Enforcement File Closure:
 Reason #1: []

Buttons: Your Enforcement Mailbox, SAVE INPUT!, Enforcement Main Site, Unlicensed Activity Info, AddView Comments, Report Center, Print File Details, S.A.I.L. System Site

- The Enforcement Files Detail page is populated when the complaint case is opened. The CI analyst is responsible for inputting the “Allegations Against Subject School or Facility”.
 - Using the drop down arrow, select one of the pre-populated allegations. Up to three allegations can be selected
- d. Remedy sought by the complainant. How does the complainant want the issue(s) resolved?
 - e. Possible violations, based on the complainant’s allegations. Cite the specific Bureau laws and regulations that apply
 - f. Jurisdiction of allegations that do not fall under Bureau law
 - g. Next steps. The next course of action to be taken

- (5) Within 15 days of receipt of complaint, the CI analyst makes contact with complainant, if known. (some complaints are sent anonymously)
- a. When making contact via phone:
1. Introduce yourself (who you are, why you are calling)
 2. Explain the investigative process
 3. Review the submitted complaint and clarify your understanding of the allegations in the complaint
 4. Request and obtain additional details and documents (i.e. enrollment agreement, school catalog, copies of payment receipts, etc.)
 - a. Ask complainant to provide documents within one week
 - b. Create a tickler file for follow up
 5. If non-jurisdictional provide resources (jurisdictional agency, phone numbers, websites, etc.)
 - a. Prepare a closure report
 - b. Prepare closure letter, including referral information/resources
 - c. Provide report to manager for approval
 - d. When approved for closure
 - i. Mail closure letter to complainant
 - ii. Close complaint in SAIL

1. Use same processes as telephone and email
- (6) Update file notes regarding all actions you have taken
- (7) Write an email or letter to complainant reiterating your conversation and what the complainant has agreed to provide within one week
 - a. Submit the drafted email or letter to manager for approval to send
 1. When approved, email or send letter to complainant
- (8) Update SAIL
 - a. Update allegations (if necessary)

The screenshot shows the 'Enforcement File Details - All Access' web application. The header includes the S.A.I.L. logo and 'Enforcement Files General Information'. The form is divided into several sections:

- Complainant Information:** Fields for First, Last, Anonymous Name, Address, Gender (M or F), Phone Number, and Attorney Retained? (Y or N). There is a checkbox for 'Anonymous File?'.
- General Complaint Information:** Includes 'Enforcement File Type' (Complaint), 'Current Staff' (BPPE Enforcement), 'Date Received' (6/19/12), and 'Date Closed' (4/10/13). A 'Follow Up Date' field is also present.
- Subject School or UnApproved/UnRegistered Facility:** Fields for Violator School Name, Violator School Contact, Violator School Address, and Violator School Phone # (760 635-1085 Ext.).
- Allegations Against Subject School or Facility:** Three dropdown menus for Allegation #1 (Contractual - Lack of Job Placement), Allegation #2, and Allegation #3. A table header for 'Allegation Description' is visible.
- Closure Information:** Includes 'BPPVE Section # Violated', 'Amount Refunded', and 'Basis for Enforcement File Closure' (Reason #1). A button for 'Initial Correspondence' is located near this section.

A blue arrow points from the 'Follow Up Date' field in the General Complaint Information section to the 'Initial Correspondence' field in the Closure Information section.

At the bottom of the page, there are navigation buttons: 'Enforcement Main Site', 'Unlicensed Activity Info', 'Add/View Comments', 'Report Center', 'Your Enforcement Mailbox', 'Print File Details', 'SAVE INPUT!', and 'S.A.I.L. System Site'.

- b. Input date the correspondence was sent in the Initial Correspondence Field

Enforcement File Details - All Access

File Institutions Enforcement Help

S. A. I. L. *Enforcement Files*
General Information

Complainant Information:
 First: Last:
 Anonymous Name:
 Address: Gender (M or F):
 Phone Number: Attorney Retained? (Y or N)
 Anonymous File?

General Complaint Information:
Enforcement File Type:
Current Staff:
Date Received: 6/19/12
Date Closed: 4/10/13
 Follow Up Date

Subject School or UnApproved/UnRegistered Facility:
 School Code: Complaint Number:
Violator School Name:
Violator School Contact:
Violator School Address: , CA
Violator School Phone #: Ext.

Allegations Against Subject School or Facility: **Allegation Description**
Allegation #1:
Allegation #2:
Allegation #3:

Basis for Enforcement File Closure:
Reason #1:

Initial Correspondence

BPPVE Section # Violated:
Amount Refunded:

- Click on the “initial Correspondence” button

Enforcement File Details - All Access

File Institutions Enforcement Help

S. A. I. L. *Enforcement Files*
General Information

Complainant Information:
 First: Last:
 Anonymous Name:
 Address: Gender (M or F):
 Phone Number:
 Attorney Retained? (Y or N)

General Complaint Information:
Enforcement File Type:
Current Staff:
Date Received: 6/19/12
Date Closed: 4/10/13

Complaint Correspondence Info:

	SENT	DUE DATE	RECVD
Initial Letter:	<input type="text"/>	<input type="text"/>	<input type="text"/>
2nd Letter:	<input type="text"/>	<input type="text"/>	<input type="text"/>
Final Letter:	<input type="text"/>	<input type="text"/>	<input type="text"/>

Subject School or UnApproved/UnRegistered Facility:
 School Code: Complaint Number:
 Violator School Name:
 Violator School Contact:
 Violator School Address:
 Violator School Phone #: CA Ext.

Allegations Against Subject School or Facility:

Allegation #	Allegation Description
Allegation #1: <input type="text"/>	<input type="text"/>
Allegation #2: <input type="text"/>	<input type="text"/>
Allegation #3: <input type="text"/>	<input type="text"/>

Basis for Enforcement File Closure:
 Reason #1:

Enforcement Main Site | Unlicensed Activity Info | Add/View Comments | Report Center | Your Enforcement Mailbox | Print File Details | SAVE INPUT! | S.A.I.L System Site

- Enter the date the correspondence was sent and the date by which the complainant is to respond

(9) Update file notes and Complaint Case Activity Tracking Log

(10) Research additional information about the school

a. Are there other complaints against the school?

1. Is there a pattern of complaints?

a. Check SAIL

b. Review other complaints

General School Information For School Code # []

File Schedule A Site Visit

S. A. I. L. Schools

General Information

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Ma

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: [] Status Date: 5/3/2013 Site Type: Main School Code: []
(When the current status changed.) **AUDIT** Institution Code: []

School/Institution Name: [] **AUDIT**

Title IV Funding? OPE ID: [] Addressing Preference: []

School Physical Address: [] **AUDIT** School Mailing Address: []

[] Ca [] CA []

County: Los Angeles Phone Number: () [] Fax Number: () 4 []

Accrediting Body/Agency: (> 2 please reflect in comments) [] Web Address (URL Address): [] Assigned Bureau Staff: [] Date Assign: []

Contact Info | Ownership | Custodian | Agent for Process | Branches/Satellites | Site Visits

Approval | Registrations | Religious Exemption | Other Ex | Enforcement | Revenue Tracking | Applications

Institutional Approvals (past and present) for Institution Code # 1939211

Approval ID	Approval Status	Approval Date	Expiration Date	Temp Expiration Date *	Associated App	Active?
[]	Accredited Institution Approval	6/29/2011	12/31/2011		[]	Yes
[]	Full Approval	3/25/2005	6/27/2011		[]	No
[]	Full Approval	6/27/2000	6/27/2004			No

* 'Temp Expiration Date' only valid if the Approval Status is 'Temporary Approval'

- Click on the Enforcement tab

General School Information For School Code # []

File Schedule A Site Visit

S. A. I. L. Schools

General Information

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Ma

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: [] Status Date: 5/3/2013 Site Type: Main School Code: []
(When the current status changed.) **AUDIT** Institution Code: []

School/Institution Name: [] **AUDIT**

Title IV Funding? OPE ID: [] Addressing Preference: []

School Physical Address: [] **AUDIT** School Mailing Address: []
 [] Ca [] CA []
 County: Los Angeles Phone Number: () [] Fax Number: () []
 Accrediting Body/Agency: (> 2 please reflect in comments) [] Web Address (URL Address): [] Assigned Bureau Staff: [] Date Assign: []

Contact Info | Ownership | Custodian | Agent for Process | Branches/Satellites | Site Visits
 Approval | Registrations | Religious Exemption | Other Exemptions | Programs | Enforcement | Revenue Tracking | Applications

Complaints/Enforcement Files for School Code # 1939211

Complaint #	Date Rcvd	Date Clsd	Allegation	Basis For Closure	File Type
[]	7/5/2011		Fraud - Other		Complaint
[]	8/22/2011		Fraud - Lack of Instruction		Complaint
[]	5/6/2011	8/3/2011	Contractual - Quality of Education	Not Substantiated - Insufficient Evidence to Confirm	Complaint
[]	12/9/2011	2/17/2012	Contractual - Failure to Make Accurate or	Resolved by School - Refund Made	Complaint
[]	10/29/2012	5/14/2013	Incompetence/Negligence - Financial	Resolved by School - Compliance Obtained	Enforcement

- All current and previous complaints against the institution are listed

b. Does the institution have a website?

1. Check the internet

2. Review the institution's website

a. Does it comply with Bureau law?

c. Is the school accredited?

a. Check the United States Department of Education's Database of Accredited Postsecondary Institutions and Programs

b. If applicable, check the appropriate accrediting agency's website

i. Has the accrediting agency taken disciplinary action against the institution?

1. Pursuant to California Education Code (CEC) §94944.6, the Bureau has the authority to request documents from the accrediting agency
- d. Does the institution and or its educational program(s) require approval from another agency?
 1. Is the approval current?
 - a. Pursuant to CEC §94899, approval is required for programs leading to licensed profession
- e. Check S.A.I.L for "Revenue Tracking".
 1. Are the fees current?
 - a. STRF
 - b. Annual
 - c. Application

S. A. I. L. Schools' General Information

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Main

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: Active Status Date: 12/23/2013 Site Type: Main School Code: Institution Code:

School/Institution Name:

Title IV Funding? OPE ID:

School Physical Address: CA 90255 County: Los Angeles

School Mailing Address: Ca 90255 Phone Number: Fax Number:

Accrediting Body/Agency: ACCSCT - Accrediting Commission of Career School Web Address (URL Address): Assigned Bureau Staff: Date Assigned:

Navigation: Contact Info | Ownership | Custodian | Agent for Process | Branches/Satellites | Site Visits | Approval | Registrations | Religious Exemption | Other Exemptions | Program | Revenue Tracking | Applications

All Financial Invoices Associated With Institution Code #1942591

Invoice #	Fee Description	Invoice Date	Amount Paid	Annual Fee Period	STRF Period	Trans No	Check Rcvd
	Non-Degree - Change of Location (Main/Branch)	2/1/07	\$285.00			158064	1/23/2007
	STRF Assessment - Non-Degree	3/17/04	\$795.00		4th Quarter - 2003	126072	3/15/2004
	STRF Assessment - Non-Degree	12/9/03	\$1,623.00		1st Quarter - 2002	122474	12/2/2003
	STRF Assessment - Non-Degree	12/9/03	\$0.00		2nd Quarter - 2002	122474	12/2/2003

Print Revenue History

- (11) Review and analyze all evidence received from complainant
 - a. Identify legal authority and applicable law
- (12) If appropriate, contact (telephone, email, letter) institution,

- a. Request specific information and documentation related to the complaint
 - 1. Request the same documents you requested from the complainant and any additional records the institution may have
 - 2. Ask the institution to provide the documents within two weeks
 - a. Send a follow up letter to the institution regarding your request
 - b. Create a tickler file for a date to follow up with the institution
- (13) Review and analyze all documentation received from the institution.
 - a. Compare documents with those received from complainant

*if institution does not respond, consult with manager for possible referral to field investigation.

- (14) Write an investigation report, including:
 - a. A synopsis of the complaint
 - 1. A brief description of the complaint
 - 2. A summary of the findings of the investigation
 - 3. A statement of the evidence used to support your findings
 - b. Allegations (the applicable laws violated)
 - 1. Cite the specific law
 - c. Definitions
 - 1. See Article 3 of the California Private Postsecondary Act of 2009 (Act) of the California Education Code (CEC)
 - d. Investigative Narrative (Case facts)
 - 1. A detailed summary of the complaint, including the date the Bureau received the complaint
 - 2. A chronological account of the investigative process and the actions taken. (Only include relevant information regarding the allegations, violations and evidence)
 - a. Keep the information factual. Do not include any personal thoughts or opinions
 - 3. If the investigation reveals possible violations that have been referred to other persons, either within the Bureau or other agencies, state to whom and when
 - 4. A statement as to whether or not the complainant and the respondent have been notified of the results of your investigation.
 - e. Exhibits

1. List of items obtained during the course of the investigation that are included in the report and support the findings. (always specify whether the exhibit is an original or a copy)

- a. Exhibit 1 is the complaint

f. Findings

1. Include the allegations exactly as stated in the report. Introduce each finding with the statement, In regard to the allegation of violation.....
 - a. Immediately following the statement regarding the violation, list the findings regarding the allegation
 - b. Following the findings, make a statement as to whether the allegation(s) was substantiated, unsubstantiated, or could not be substantiated, based on the evidence collected
 - c. Include exhibit numbers for documents referenced in the findings

g. Recommendation

1. What is your recommendation for disposition of your investigation? (i.e case closure, refer to field investigation, citation, etc.)

h. Attachments

1. List of items that are attached to the report and are pertinent to the investigation but are not included in the evidence
 - a. Always indicate if the attachment is an original or a copy

i. Witnesses

1. A list of people interviewed or who provided documentation
 - a. Always list yourself as the first witness

(15) Provide the completed report to the Complaint Investigations Manager for review and approval

- a. Write a closure letter to the complainant and school, if applicable
- b. Obtain management approval prior to sending closure letters.
 1. Closure letters may not be mailed until the investigative report has been approved for closure by the manager or designated staff person.

(4) COMPLAINT DISPOSITION

Based on the findings of the investigation, the following may occur

(1) Complaint approved for closure

Enforcement File Details - All Access

File Institutions Enforcement Help

S. A. I. L. Enforcement Files
General Information

Complainant Information:
 First: [BPPE] Last: [Licensing]
 Anonymous Name: _____
 Address: _____ Gender (M or F):
 Phone Number: _____
 Attorney Retained? (Y or N)

General Complaint Information:
 Enforcement File Type: [Complaint]
 Current Staff: [BPPE Enforcement]
 Date Received: 6/19/12
 Date Closed: 4/10/13

Subject School or UnApproved/UnRegistered Facility:
 School Codes: [REDACTED] Complaint Number: 998242
 Violator School Name: [REDACTED]
 Violator School Contact: [REDACTED]
 Violator School Address: [REDACTED]
 Violator School Phone #: [REDACTED] Ext. [REDACTED]

Allegations Against Subject School or Facility:
 Allegation #1: [Contractual - Lack of Job Placement]
 Allegation #2: [REDACTED]
 Allegation #3: [REDACTED]

Basis for Enforcement File Closure:
 Reason #1: [Non-Operation]

Closure Information:
 Reason # Violated: [REDACTED]
 Amount Refunded: [REDACTED]

Initial Correspondence

Anonymous File?

Follow Up Date: [REDACTED]

Your Enforcement Mailbox [SAVE INPUT]

Enforcement Main Site | Unlicensed Activity Info | Add/View Comments | Report Center | Print File Details | S.A.I.L. System Site

- b. Mail complaint closure letter to complainant and institution
- c. File copy of letter(s) in case file

(2) Complaint approved for transfer

If the desk CI analyst is unable to resolve the complaint it may be necessary to transfer the case to a field CI analyst that can go to the institution location to collect records

- a. The desk CI analyst makes notes in SAIL

Enforcement File Details - All Access

File Institutions Enforcement Help

S. A. I. L. *Enforcement Files General Information*

Complainant Information:
 First: Last:
 Anonymous Name:
 Address: Gender (M or F):
 Phone Number: Attorney Retained? (Y or N)
 Anonymous File?

School Code: **Complaint Number:**

Subject School or UnApproved/UnRegistered Facility:
 Violator School Name:
 Violator School Contact:
 Violator School Address: CA
 Violator School Phone #: Ext.

General Complaint Information:
Enforcement File Type:
Current Staff:
Date Received: 6/19/12
Date Closed: 4/10/13
 Follow Up Date

Allegations Against Subject School or Facility:
 Allegation #1:
 Allegation #2:
 Allegation #3:

Complaint Correspondence Info:

	SENT	DUE DATE	RECV'D
Initial Letter:	<input type="text"/>	<input type="text"/>	<input type="text"/>
2nd Letter:	<input type="text"/>	<input type="text"/>	<input type="text"/>
Final Letter:	<input type="text"/>	<input type="text"/>	<input type="text"/>

Basis for Enforcement File Closure:
 Reason #1:

- Click on the "Add/View Comments" button

Enforcement - Comments & History

ENFORCEMENT - Add/View Comments

OR

For the below Complaint or Unapproved Facility File

Complaint #

- Click on the "Add Comment" button

Enforcement - Add A Comment

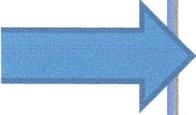
ENFORCEMENT - Add Comments

Comment to be Associated with

Complaint # * Required

and/or

Comment Body: School Code * Optional



- Enter a comment that the case is being referred for field investigation

Enforcement - Add A Comment

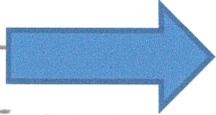
ENFORCEMENT - Add Comments

Comment to be Associated with

Complaint # **and/or**

School Code * Optional

Comment Body:



- Click the “Add Comment” button

(4) Complaint approved for formal discipline

- a. Notify the complainant and school of your findings
- b. Request a License Certification from the Bureau's Custodian of Record.
 - 1. Send an email to the Custodian of Record requesting the licensing history of the specific institution. Be sure to cc: your manager on the email.
 - a. Provide the institution name, school code, and address
- c. Complete the "Enforcement Referral" Form
- c. Complete a "Complaint Action Request" Form
 - 1. Provide to the Complaint Investigations manager for approval
 - 2. Upon approval forward complaint file and forms to support staff for transfer to the Discipline Unit.

Bureau for Private Postsecondary Education Procedure

Title: Expired Approvals	Supersedes: None	Procedure #: 2013-0047
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 2
Issue Date: May 20, 2013	Approved By:  Bureau Chief Bureau for Private Postsecondary Education	

Policy: *The highest priority of the Bureau for Private Postsecondary Education (Bureau) is consumer protection. The California Private Postsecondary Education Act of 2009 (Act) gives the Bureau authority to file a complaint against a school that is operating with an expired license.*

Purpose: *A monthly Schools Automated Information Link (SAIL) report is run to determine which schools have expired approvals to operate. The list of institutions with expired approvals is forwarded to the Complaint Investigations manager for review.*

The list of institutions with expired approvals is forwarded to the Support/Intake staff of the Complaint Investigations Unit. The staff opens a complaint using the complaint intake process and assigns the complaint to an Unlicensed Activity (UA) analyst for investigation.

Definitions:

Active: *the institution has a valid approval to operate issued by the Bureau*

Approval to Operate: *the authorization to offer to the public and to provide postsecondary educational programs*

Approved to Operate: *an institution has received authorization to offer postsecondary educational programs to the public.*

Expired Approval: *the institutions approval to operate is no longer valid because the institution owner did not submit a renewal application before the approval expiration date*

Institution: *any private postsecondary educational school, including its branch campuses and satellite locations.*

Owner: an individual in the case of a sole proprietorship, partners in a partnership, members in limited liability company, or shareholders in a corporation.

Ownership: legal or equitable interest in an institution, including ownership of assets or stock

Postsecondary education: a formal institutional educational program whose curriculum is designed primarily for students who have completed or terminated their secondary education or are beyond the compulsory age of secondary education, including programs whose purpose is academic, vocational, or continuing professional education

Private Postsecondary Educational Institution: a private entity with a physical presence in this state that offers postsecondary education to the public for an institutional charge.

Offer to the Public: advertise, publicize, solicit or recruit

Operate: establish, keep, or maintain any facility or location in this state where, or from which or through which, postsecondary educational programs are provided.

ENFORCEMENT SECTION

COMPLAINT INVESTIGATIONS PROCEDURES

EXPIRED APPROVALS

An institution with an expired approval is only allowed to continue to operating if:

- a. A renewal application is received within six months of the expiration date

AND

- b. All fees (Student Tuition Recovery Fund (STRF), Annual, and Application) are current.

An institution operating with an expired approval that has not submitted a renewal application within six months of the expiration date of the approval to operate may not operate under any circumstances. The institution must submit a new application for approval to operate and cease all operations.

2. SCHOOLS AUTOMATED INFORMATION LINK (SAIL) DATABASE REPORT

Each month the Administration Unit runs a SAIL report that identifies institutions with an expired approval status. The report is provided to the Complaint Investigations Unit Manager for review. The Manager or his/her designee is responsible for reviewing the list and SAIL to determine if an application has been received within six months of the expiration date and if all fees are up to date. If an application and fees are current, no further action is required regarding the institution.

3. CASE ASSIGNMENT

- (1) The Complaint Investigations Unit Manager forwards the list of expired approvals to the Complaint Investigations Unit Support Staff.
 - a. Support staff opens a complaint case for each institution with an expired approval and assigns the case to an Unlicensed Activity (UA) or Complaint Investigations (CI) analyst. (refer to Support Staff Procedures for opening a complaint)

4. SEARCH FOR EVIDENCE

- (1) Within 15 days of receiving the case, the UA or CI analyst is to make contact with the institution/ institution owner
 - i. Contact can be made through telephone call, email and/or letter
 - ii. Research the internet for an active website (copy the webpages to include in the complaint file.
 - iii. Search SAIL for owner contact information.

Institutions/Schools Main Site

File Annual Reports Application Processing Certs of Authorization Enforcement Revenue Tracking School Information STRF Title 38 Help

Schools Information

▶ Schools Information

1. Enter School Code: Go >>

(Example: 3404141)

Other Searches

▶ Enforcement/Complaints

▶ Applications Processing

▶ Annual Reports

▶ STRF

▶ Revenue Tracking

▶ COAFS / Agent Permits

▶ S.A.I.L. Net Main Site

S.A.I.L. NET

Schools Automated Information Link

Schools Main Site

The School Information site welcomes to the system.

Institutions Report Center

- Enter School Code

Institutions/Schools Main Site

File Annual Reports Application Processing Certs of Authorization Enforcement Revenue Tracking School Information STRF Title 38 Help

Schools Information

▶ Schools Information

1 Enter School Code: Go >>

(Example: 340 41)

Other Searches

▶ Enforcement/Complaints

▶ Applications Processing

▶ Annual Reports

▶ STRF

▶ Revenue Tracking

▶ COAFS / Agent Permits

▶ S.A.I.L. Net Main Site

S.A.I.L. NET

Schools Automated Information Link

Schools Main Site

The School Information site welcomes to the system.

Institutions Report Center

- Click on the “Go” button

General School Information For School Code [REDACTED]

File Schedule A Site Visit

S. A. I. L. Schools
 General Information

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Main

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: [REDACTED] Status Date: 9/7/2010 Site Type: Main School Code: [REDACTED]
 (When the current status changed.) **AUDIT** Institution Code: 3

School/Institution Name: [REDACTED] **AUDIT**

Title IV Funding? OPE ID: [REDACTED] Addressing Preference: [REDACTED]

School Physical Address: [REDACTED] **AUDIT** School Mailing Address: [REDACTED]

Sacramento, CA 95834 Sacramento, CA 95834
 County: Sacramento Phone Number: (916) [REDACTED] Fax Number: (916) [REDACTED]

Accrediting Body/Agency: (> 2 please reflect in comments)
 NACCAS - National Accrediting Commission of Cosn Web Address (URL Address): [REDACTED] Assigned Bureau Staff: [REDACTED] Date Assigned: [REDACTED]

Ownership Custodian Agent for Process Branches/Satellites Site Visits
 Approval Registrations Religious Exemption Other Exemptions Programs Enforcement Revenue Tracking Applications

Institutional Approvals (past and present) for Institution Code # 3401271

Approval ID	Approval Status	Approval Date	Expiration Date	Temp Expiration Date *	Associated App	Active?
[REDACTED]	Accredited Institution Approval	5/12/2012	1/31/2016		[REDACTED]	Yes
[REDACTED]	Full Approval	12/21/2005	6/28/2012		[REDACTED]	No
[REDACTED]	Full Approval	6/30/2001	6/29/2005		[REDACTED]	No
[REDACTED]	Full Approval	7/1/1995	6/30/2001			No
42005	Full Approval	6/1/1981	7/1/1995			No

* 'Temp Expiration Date' only valid if the Approval Status is 'Temporary Approval'

- The "School Status" box indicates if the institution has an active approval or an expired approval
- General School Information for School Code (the school code you entered) will appear.
- Click on the "Ownership" Tab

General School Information For School Code [REDACTED]

File Schedule A Site Visit

S. A. I. L. *Schools General Information*

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Main

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: [REDACTED] Status Date: 9/7/2010 Site Type: Main School Code: [REDACTED]
 (When the current status changed.) **AUDIT** Institution Code: [REDACTED]

School/Institution Name: [REDACTED] **AUDIT**

Title IV Funding? OPE ID: [REDACTED] Addressing Preference: [REDACTED]

School Physical Address: [REDACTED] **AUDIT** School Mailing Address: [REDACTED]

Sacramento, CA 95834 Sacramento, CA 95834
 County: Sacramento Phone Number: (916) [REDACTED] Fax Number: (916) [REDACTED]
 Accrediting Body/Agency: (> 2 please reflect in comments) NACCAS - National Accrediting Commission of Cosm Web Address (URL Address): [REDACTED] Assigned Bureau Staff: [REDACTED] Date Assigned: [REDACTED]

Approval | Registrations | Religious Exemption | Other Exemptions | Programs | Enforcement | Revenue Tracking | Applications
 Contact Info | Ownership | Custodian | Agent for Process | Branches/Satellites | Site Visits

Owner Profiles Having/Had Ownership Interest In Institution Code #3401271 .

Owner ID	Business Name	Owner Name	Ownership Began	Percent Owned	Active Ownership?
2	[REDACTED]	[REDACTED]	1/23/1986	100	True

There are currently 1 ACTIVE owners with 100% ownership interest. **Add An Owner**

(1) Click on the drop down arrow in the "Owner ID" section

Ownership Information (Owner ID [redacted])

S.A.I.L. *Owners' Detail*

Owner Flag: Owner ID: []

School Owner (First) [] (Last) []

Owner's Title: Director

Business Name: []

Parent Company: []

Business Type: Corporation

State of Incorporation: CA Date Incorporated: 1/23/1986

Tax ID: [] Driver's License #: []

SSN: [] State Issued: CA

Owner's Address: []

Sacramento, CA 95818

Owner's Phone: (916) [] Phone Format

Owner's Fax: [] [redacted]

All Institutions With Which [redacted] is Associated.				
School Code	Ownership Began	Ownership Ended	Percent Owned	Active Owner?
[]	1/23/1986		100	True

Close Owner Window Print Owner Report Add/View Comments SAVE WORK!

- (2) Utilize the owner's phone number, address, etc. to attempt contact
- i. Analyst is to document all efforts of contact in investigation notes

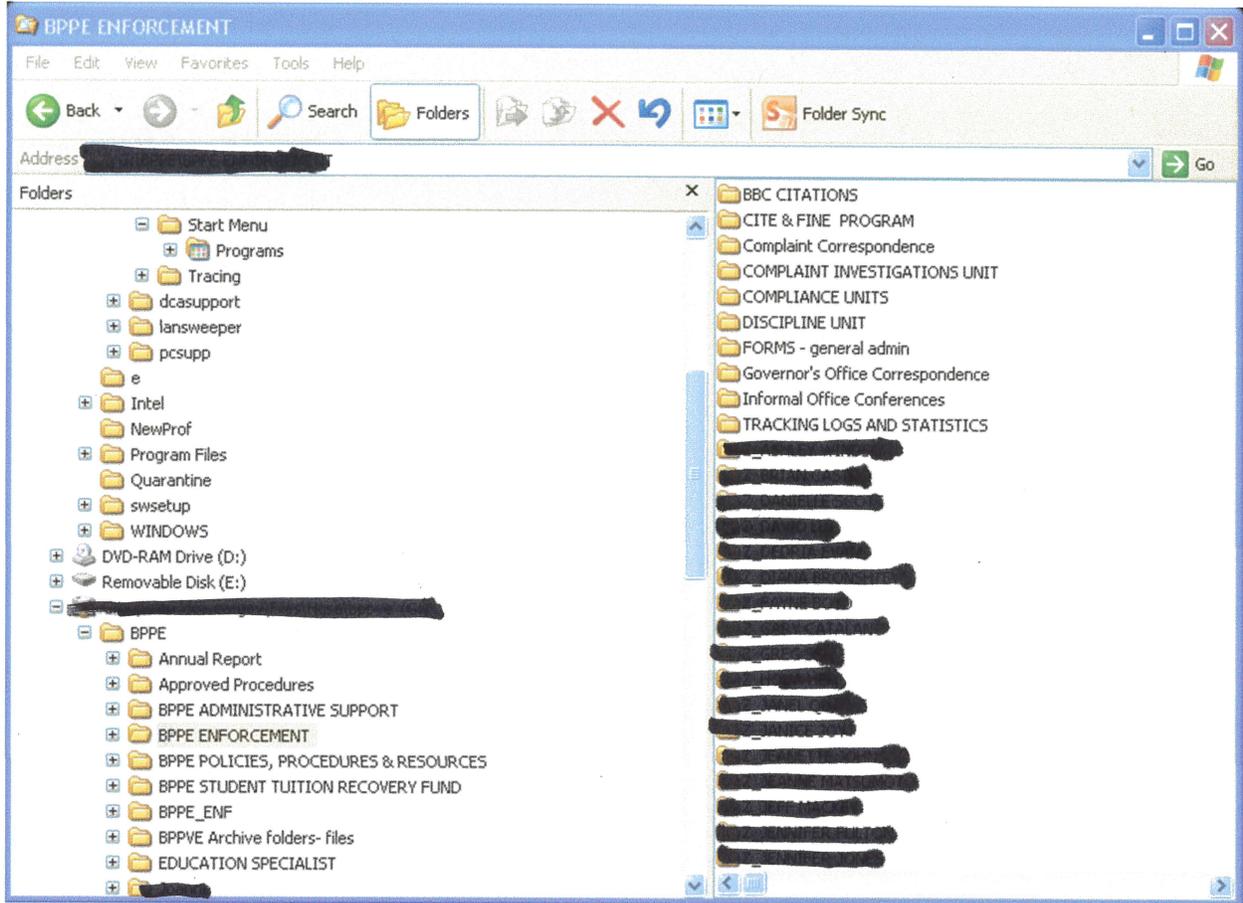
5. RECOMMEND OPERATING EDUCATIONAL INSTITUTION WITHOUT PROPER APPROVAL LETTER

If the analyst determines the institution is in operation, the analyst writes a summary of the findings and recommends the issuance of an Operating Educational Institution without Proper Approval Letter.

6. PREPARE, MAIL AND FILE THE OPERATING EDUCATIONAL INSTITUTION WITHOUT PROPER APPROVAL LETTER

A. PREPARE THE OPERATING EDUCATIONAL INSTITUTION WITHOUT PROPER APPROVAL LETTER

- (1) The analyst completes the template letter and performs a “save as,” saving the completed letter into the appropriate CI analyst Z_ subfolder.



- a. Use the template Operating Educational Institution without Proper Approval Letter and the required enclosure located in [REDACTED] ENFORCEMENT\COMPLAIN [REDACTED] INVESTIGATIONS [REDACTED] UNIA LETTER TEMPLATES\LETTERS TO SCHOOLS\. (Attachment A)
- b. If there is more than one address for the institution, the analyst includes all known addresses in the letter.
- c. The “failure to respond” date should be 14 days from the date of the letter, or the next weekday after 14 days.
- d. The analyst is the listed contact person and also signs the letter.

B. MAIL / ISSUE THE OPERATING EDUCATIONAL INSTITUTION WITHOUT PROPER APPROVAL LETTER

Bureau for Private Postsecondary Education Procedure

- (1) Prepare certified, return-receipt documents for each address listed in the letter.
 - a. Write your name or initials and the unit name on the return receipt document so that the card will be returned to the appropriate person
- (2) Prepare two envelopes for each address listed in the letter. One envelope is for regular postal service and the second envelope is for certified, return-receipt service.
- (3) After signing the letter, make copies of the letter and letter enclosure.
- (4) Place the original letter with enclosure(s) in the certified, return-receipt envelope. Copies may be inserted into the regular mail envelope and envelopes for any additional known addresses.
- (5) Attach the certified and return receipt documents to the appropriate envelope(s).
- (6) Stamp or handwrite the Enforcement Index Code 6802 under the Bureau's return address on the envelope
- (7) Place all envelopes in the Bureau outgoing mail basket.

C. FILE A COPY OF THE OPERATING EDUCATIONAL INSTITUTION WITHOUT PROPER APPROVAL LETTER

A copy of the Operating Educational Institution without Proper Approval Letter shall be retained in the case file

- (1) Attach the return-receipt document to a blank 8.5 X 11 paper. Staple this page as the last page to the case file's copy of the letter and enclosure.
- (2) Place into the case file, under the "Correspondence" cover sheet, on the right hand side of the file.
- (3) Provide a copy of the Operating Educational Institution without Proper Approval Letter to the Closed Schools Unit

7. CALENDAR AND FOLLOW-UP

After mailing the Operating Educational Institution without Proper Approval Letter, the analyst calendars the matter for 20 days.

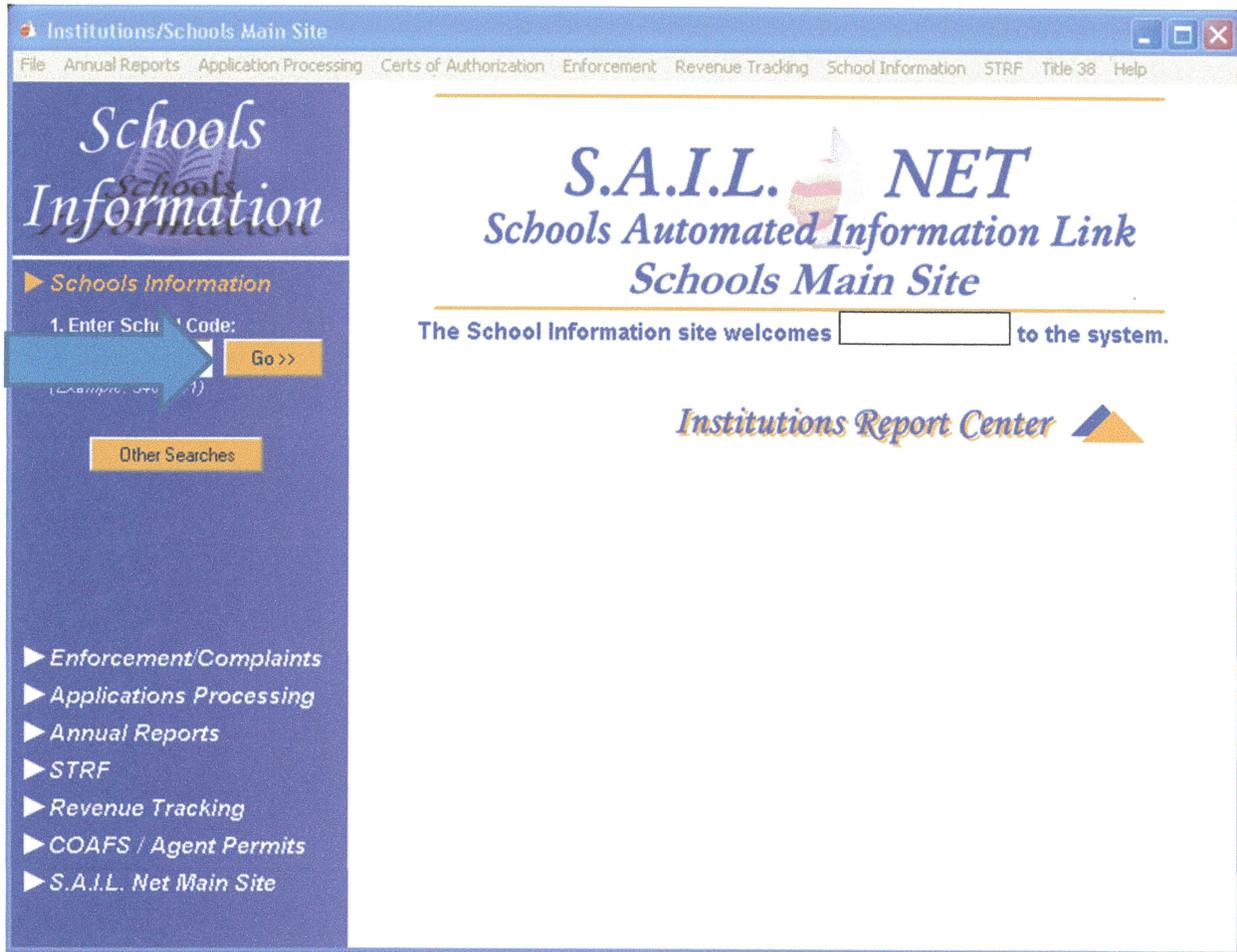
A. INSTITUTION OWNER RESPONDS

- (1) Institution is no longer in operation
 - a. Analyst provides the institution owner with the contact information for the Closed School Unit and directs owner to the Bureau's website to obtain a Closed School Application. [REDACTED]
 - b. Analyst notifies Closed School Unit of institution closure
 - c. Analyst calendars a follow up with the Closed School Unit

- d. Once the institution has completed and submitted the Closed School Application, the analyst completes the investigation report and forwards to the Complaint Investigations Manager for approval to close.
 - i. Once the case is approved for closure, analyst closes complaint in SAIL, completes a Complaint Case Action Request Form (**Attachment B**) and forwards to Complaint Investigations support staff for closure on the Complaint Case Aging Log.
- (2) Owner informs analyst that an application will be filed with the Bureau.
 - a. Analyst must determine if it has been more than six months since the expiration of the approval to operate and check SAIL to determine if all fees are current.

The screenshot shows a web browser window titled "Institutions/Schools Main Site". The browser's address bar and menu bar are visible. The page content includes a navigation sidebar on the left with the following items: "Schools Information" (highlighted), "Enforcement/Complaints", "Applications Processing", "Annual Reports", "STRF", "Revenue Tracking", "COAFS / Agent Permits", and "S.A.I.L. Net Main Site". The main content area features the "S.A.I.L. NET Schools Automated Information Link Schools Main Site" logo and the text "The School Information site welcomes [input field] to the system." Below this is the "Institutions Report Center" logo. A search form is located in the sidebar, with the prompt "1. Enter School Code:" and a "Go >>" button. A blue arrow points to the search input field.

- Enter School Code



- Click the "Go" button

General School Information For School Code [REDACTED]

File - Schedule A Site Visit

S. A. I. L. Schools
 General Information

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Main

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: [REDACTED] Status Date: 9/7/2010 Site Type: Main School Code: [REDACTED]
 (When the current status changed.) **AUDIT**

Institution Code: [REDACTED] **AUDIT**

School/Institution Name: [REDACTED]

Title IV Funding? OPE ID: [REDACTED] Addressing Preference: [REDACTED]

School Physical Address: **AUDIT** School Mailing Address: [REDACTED]

Sacramento, CA 95834 Sacramento, CA 95834
 County: Sacramento Phone Number: (916) [REDACTED] Fax Number: (916) [REDACTED]

Accrediting Body/Agency: (> 2 please reflect in comments) NACCAS - National Accrediting Commission of Cosn Web Address (URL Address): [REDACTED] Assigned Bureau Staff: [REDACTED] Date Assigned: [REDACTED]

Contact Info | Ownership | Custodian | Agent for Process | Branches/Satellites | Site Visits
 Approval | Registrations | Religious Exemption | Other Exemptions | Programs | Revenue Tracking | Applications

Institutional Approvals (past and present) for Institution Code # 3401271

Approval ID	Approval Status	Approval Date	Expiration Date	Temp Expiration Date *	Associated App	Active?
[REDACTED]	Accredited Institution Approval	5/12/2012	1/31/2016		[REDACTED]	Yes
[REDACTED]	Full Approval	12/21/2005	6/28/2012		[REDACTED]	No
[REDACTED]	Full Approval	6/30/2001	6/29/2005		[REDACTED]	No
[REDACTED]	Full Approval	7/1/1995	6/30/2001			No
[REDACTED]	Full Approval	6/1/1981	7/1/1995			No

* 'Temp Expiration Date' only valid if the Approval Status is 'Temporary Approval'

- Click on the "Revenue Tracking" Tab

General School Information For School Code [REDACTED]

File Schedule A Site Visit

S. A. I. L. Schools
 General Information

Report Center Add/View Comments Save Work! Add School Item @ A Glance Back To Main

Institution's Program Types: Vocational: Degree: Registered: Title 38: Religious Exempt: Exempt: Residential: Distance Learning:

School Status: Status Date: 9/7/2010 Site Type: Main School Code:
 (When the current status changed.) **AUDIT** Institution Code:

School/Institution Name: **AUDIT**

Title IV Funding? OPE ID: [REDACTED] Addressing Preference:

School Physical Address: **AUDIT** School Mailing Address:

Sacramento, CA 95834 Sacramento, CA 95834
 County: Sacramento Phone Number: (916) Fax Number: (916)

Accrediting Body/Agency: (> 2 please reflect in comments) Web Address (URL Address): Assigned Bureau Staff: [REDACTED] Date Assigned: [REDACTED]
 NACCAS - National Accrediting Commission of Cosn

Contact Info | Ownership | Custodian | Agent for Process | Branches/Satellites | Site Visits
 Approval | Registrations | Religious Exemption | Other Exemptions | Programs | Enforcement | Revenue Tracking | Applications

All Financial Invoices Associated With Institution Code #3401271.

Invoice #	Fee Description	Invoice Date	Amount Paid	Annual Fee Period	STRF Period	Trans No	Check Rcvd
[REDACTED]	STRF Assessment	7/3/13			2nd Quarter - 2013		
[REDACTED]	Annual 94930.5c(2.d.A) Inst	5/1/13	\$22,419.82	June - 2013			
[REDACTED]	STRF Assessment	4/4/13	\$306.00		1st Quarter - 2013		
[REDACTED]	STRF Assessment	1/15/13	\$1,290.00		4th Quarter - 2012	179020	1/25/2013

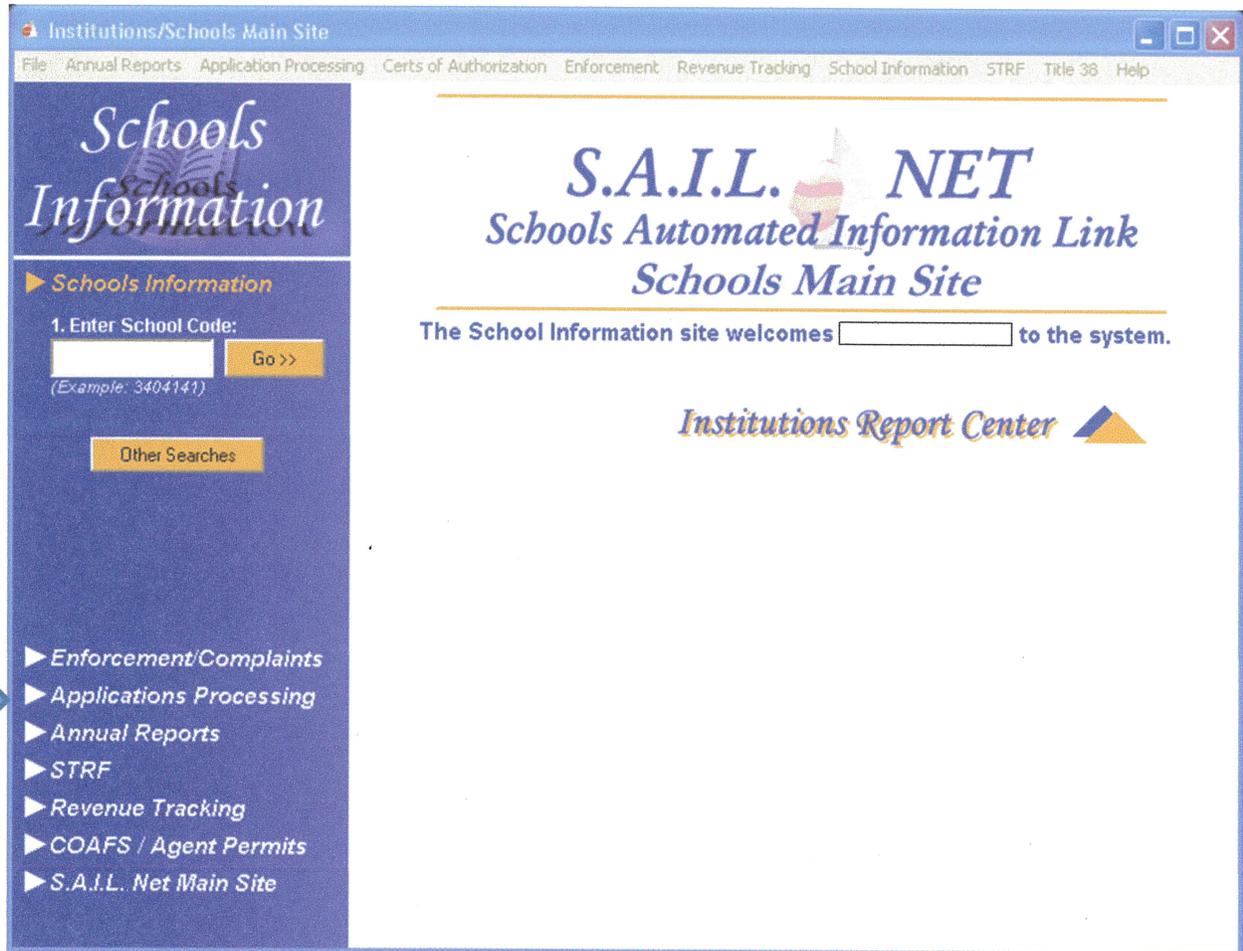
Print Revenue History

- You can view the revenue history by scrolling down
- You can also print a "Revenue History" Report by clicking the "Print Revenue History" button

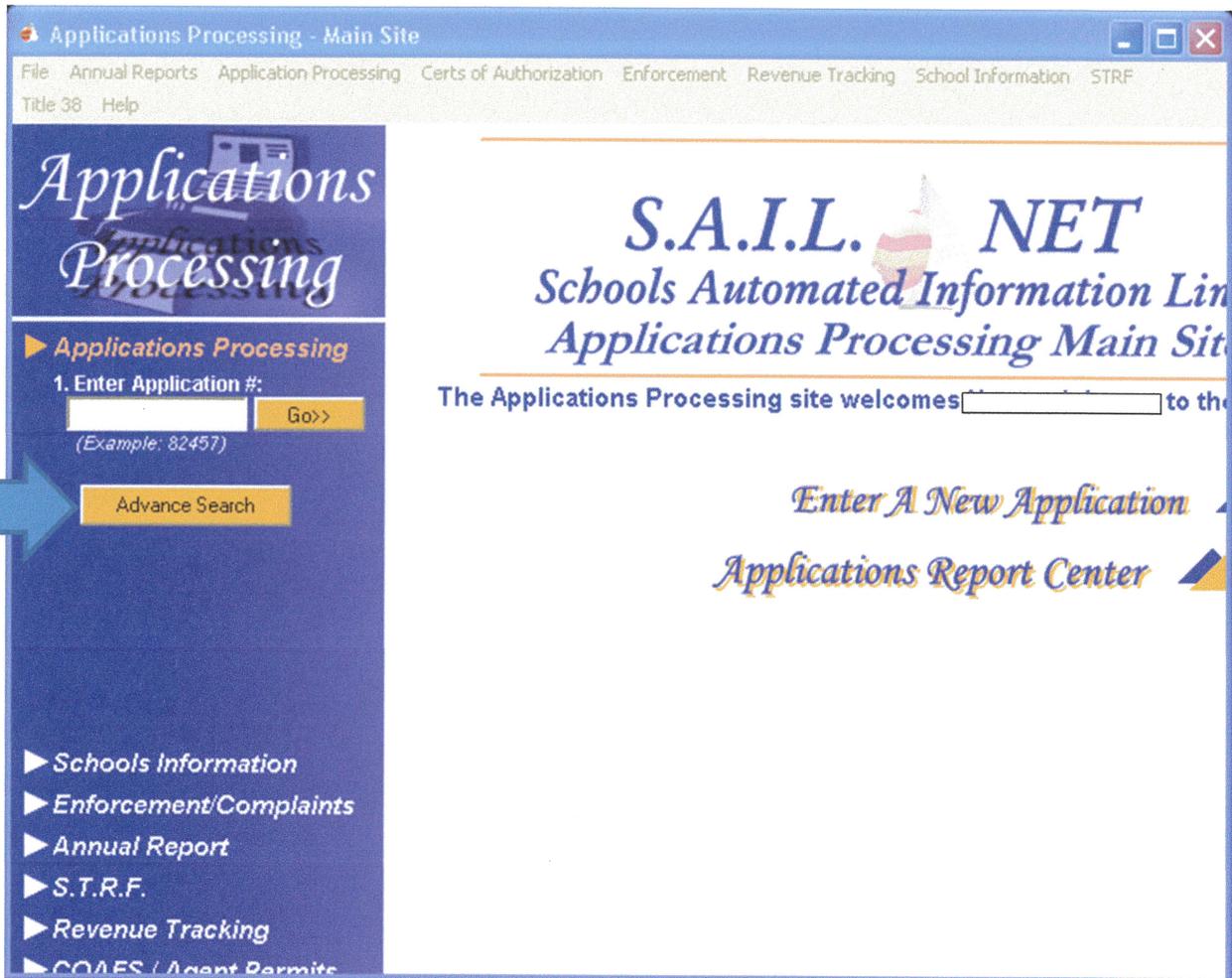
(3) If six months or more have passed, and/or the required fees are not current, the Analyst instructs the owner that the institution may not continue to conduct business. Advise owner that a citation up to \$50,000 will be issued if there is evidence to support the operation of the institution. The owner is required to file a new application for approval to operate, with the appropriate fees. A renewal application will not be accepted.

- Analyst directs the owner to the Bureau's website at [REDACTED] to obtain a copy of the Closed School Form, or offers to mail one.
- Send an email to the Closed School Unit informing them of the institution's status
- Follow up with the Closed School Unit to determine if the institution has followed the proper school closure process

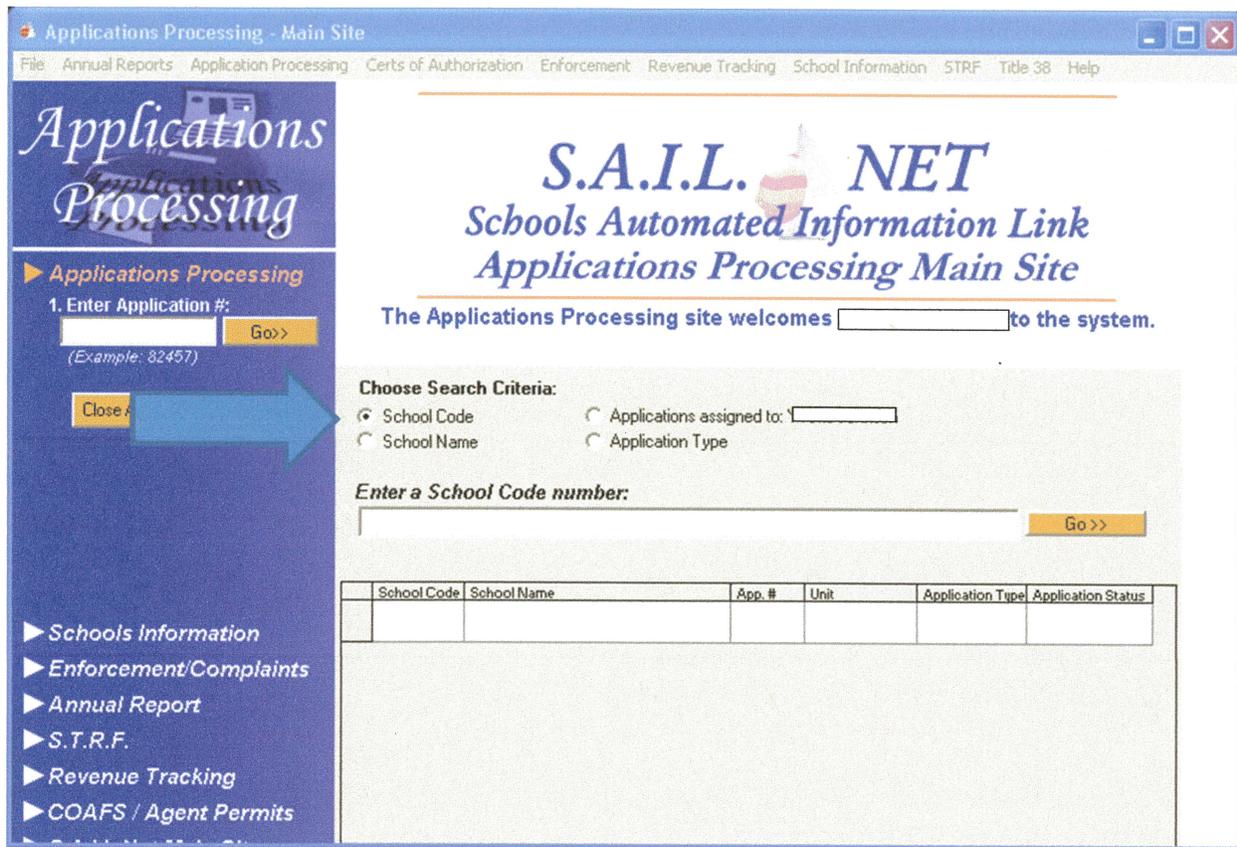
- d. Check SAIL and follow up with the Licensing Unit to determine if the institution has submitted an application.



- Click on the “Application Processing” field



- Click on the "Advance Search" button
- This provides you the ability to use different search criteria



- Enter the information you have available, school code, school name, or application type
 - This allows you to check whether the Bureau has received an application.
- (4) If it has been fewer than six months since the approval expired and all fees are current, institution may submit a renewal application and continue to operate until action is taken on the renewal application.

B. INSTITUTION OWNER FAILS TO RESPOND

If the owner does not respond within 20 days, the analyst performs an investigation to confirm the institution is currently operating.

- a. Analyst prepares an Investigation Report and Enforcement Referral Form recommending the institution be referred for a citation, for continuing to operate.
- b. Analyst submits Investigation Report and Enforcement Referral for manager approval
- c. If there is no evidence the school is operating or has a presence in California, the analyst writes an investigations report recommending case closure

Upon approval of the Investigation Report and Enforcement Referral Form, the case is transferred to the Citation Unit.

8. REQUEST A SITE VISIT

In some instances a site visit may be required to determine if an institution is in operation.

- a. Analyst recommends a site visit to the Complaint Investigations Manager
- b. Analyst completes a "Request for Site Visit" Form (**Attachment C**) and forwards to Manager for approval
- c. Manager forwards approved "Request for Site Visit" Form to Enforcement Chief for assignment. The site visit may be assigned to a field investigator, compliance inspector or education specialist.

9. SITE VISIT

A site visit to the address of record for the institution is needed to confirm if the institution is in operation

- a. Upon arrival at the location, the assigned staff person is to take pictures of the location and to collect any information that may substantiate the institution is continuing to operate or is closed.
- b. Upon completion of the site visit the assigned staff person is to write a report of their findings and return the report to the assigned analyst to be included as an attachment of the investigative report. .

10. COMPLAINT CLOSURE

If institution is not in operation, the assigned analyst completes the investigation report, including the Site Visit report as an attachment.

- a. Analyst forwards investigation report to Complaint Investigations Unit manager for approval to close
- b. Upon approval analyst closes complaint in SAIL.

Institutions/Schools Main Site

File Annual Reports Application Processing Certs of Authorization Enforcement Revenue Tracking School Information STRF Title 38 Help

Schools Information

Schools Information

1. Enter School Code:

(Example: 3404141)

- ▶ Enforcement/Complaints
- ▶ Applications Processing
- ▶ Annual Reports
- ▶ STRF
- ▶ Revenue Tracking
- ▶ COAFS / Agent Permits
- ▶ S.A.I.L. Net Main Site

S.A.I.L. NET

Schools Automated Information Link
Schools Main Site

The School Information site welcomes to the system.

Institutions Report Center

- Click on the "Enforcement/Complaints" field

Enforcement/Complaints - Main Site

File Annual Reports Application Processing Certs Of Authorization Enforcement Revenue Tracking School Information STRF Title 38 Help

Enforcement/Complaints

▶ **Enforcement/Complaints**

1. Enter Complaint Number:
 Go >>
(Example: 991088)

2. Search by School Code:
 Go >>
(Example: 1928871)

3. Search by Institution Name:

Go >>
(Example: Elite Progressive)

4. Search by Complainant Name:
 Go >>

▶ Schools Information
▶ Applications Processing
▶ Annual Reports
▶ S.T.R.F.
▶ Revenue Tracking
▶ COAFS / Agent Permits
▶ S.A.I.L. Net Main Site

S.A.I.L. NET

Schools Automated Information Link Enforcement Main Site

The Enforcement and Compliance Site welcomes Yvette Johnson.

Enforcement Staff Mailbox ▲

Enforcement Staff Current Workload ▲

Add An Enforcement File Manually ▲

Enforcement Report Center ▲

- Enter the assigned complaint number
- Click the “Go” button

Enforcement File Details - All Access

File Institutions Enforcement Help

S. A. I. L. *Enforcement Files General Information*

Complainant Information:
 First: Last:
 Anonymous Name:
 Address: Gender (M or F):
 Phone Number:
 Attorney Retained? (Y or N)

General Complaint Information:
Enforcement File Type:
Current Staff:
Date Received: 9/22/12
Date Closed:

Closure Information:
BPPVE Section # Violated:
Amount Refunded:

Subject School or UnApproved/UnRegistered Facility:
 School Code: Complaint Number:
Violator School Name:
Violator School Contact:
Violator School Address:
 Violator School Phone #: 909 Ext.

Allegations Against Subject School or Facility:

Basis for Enforcement File Closure:
Reason #1:

Follow Up Date:

Anonymous File?

Your Enforcement Mailbox

Enforcement Main Site

- Enter the "Date Closed" date and,
- Complete the "Basis for Enforcement File Closure"

Enforcement File Details - All Access

File Institutions Enforcement Help

S. A. I. L. Enforcement Files General Information

Complainant Information:
 First: [redacted] Last: [redacted]
 Anonymous Name: [redacted]
 Address: [redacted] Gender (M or F): [redacted]
 Phone Number: [redacted]
 Attorney Retained? (Y or N): [redacted]

General Complaint Information:
 Enforcement File Type: Complaint
 Current Staff: [redacted]
 Date Received: 9/22/12
 Date Closed: [redacted]

Subject School or UnApproved/UnRegistered Facility:
 School Code: [redacted] Complaint Number: [redacted]
 Violator School Name: [redacted]
 Violator School Contact: [redacted]
 Violator School Address: [redacted] CA [redacted]
 Violator School Phone #: [redacted] Ext. [redacted]

Allegations Against Subject School or Facility:
 Allegation #1: Contractual - Quality of Education
 Allegation #2: Contractual - Quality of Equipment/Supplies
 Allegation #3: Contractual - Quality of Instruction

Basis for Enforcement File Closure:
 Reason #1: [redacted]

Closure Information:
 BPPVE Section # Violated: [redacted]
 Amount Refunded: [redacted]

Initial Correspondence

Enforcement Main Site **Add/View Comments** Report Center Your Enforcement Mailbox **SAVE INPUT!** Print File Details S.A.I.L. System Site

- Add comments to the electronic file by clicking on “Add/View Comments”

Enforcement - Comments & History

ENFORCEMENT - Add/View Comments

Add Comment OR View Comment History

For the below Complaint or Unapproved Facility File

Complaint # [redacted]

Back to Case Details

- Click the “Add Comment” button

Enforcement - Add A Comment

ENFORCEMENT - Add Comments

Comment to be Associated with

Complaint # and/or School Code * Optional

Comment Body:

- Enter comments you have regarding the case
- Click the “Add Comment” button

The screenshot displays the 'Enforcement File Details - All Access' web application. The header includes the S.A.I.L. logo and 'Enforcement Files General Information'. The main content area is divided into several sections:

- Complainant Information:** Fields for First/Last name, Anonymous Name, Address, Gender (M or F), Phone Number, and Attorney Retained? (Y or N). Includes an 'Anonymous File?' checkbox.
- General Complaint Information:** Fields for Enforcement File Type (Complaint), Current Staff, Date Received (9/22/12), and Date Closed. Includes a 'Follow Up Date' field.
- Subject School or UnApproved/UnRegistered Facility:** Fields for Violator School Name, Violator School Contact, Violator School Address, and Violator School Phone # (with CA state dropdown and Ext. field).
- Allegations Against Subject School or Facility:** A table with columns for Allegation # and Allegation Description. Three allegations are listed: Contractual - Quality of Education, Contractual - Quality of Equipment/Supplies, and Contractual - Quality of Instruction.
- Basis for Enforcement File Closure:** A field for Reason #1.
- Closure Information:** Fields for BPPVE Section # Violated and Amount Refunded. Includes an 'Initial Correspondence' checkbox.

At the bottom, there are navigation buttons: Enforcement Main Site, Unlicensed Activity Info, AddView Comments, Report Center, Print File Details, and S.A.I.L. System Site. A large blue arrow points to the 'SAVE INPUT!' button.

- Click the “Save Input” button
 - You can exit the record by clicking on the “Enforcement Main Site” button
- c. Analyst completes a “Complaint Case Action Request” Form (Attachment B) to have the complaint closed on the Complaint Case Aging Log, and forwards to support staff for closure. .
- d. Analyst completes a Closed School Referral Form (Attachment D)
- i. Attach a copy of the investigation report, including all supporting documents
 - ii. Forward the “Closed School Referral” Form and the report to the Closed School Unit.
- e. Upon approval, analyst completes the “Closed School Referral” Form

11. TRANSFER TO CITATION UNIT

If the institution is found operating

- a. Analyst completes a "Complaint Case Action Request Form (Attachment B) for management approval
- b. Analyst completes an "Enforcement Referral Form" (Attachment E) and provides to manager for approval
- c. Analyst provides the complete case file, with the "Complaint Case Action Request Form" and the "Enforcement Referral" Form to the support staff to transfer the case in SAIL and on the Complaint Case Aging Log to the Citation Unit.

Once transferred, the complaint case will become a citation case and is no longer considered an active complaint.



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



REGULAR AND CERTIFIED MAIL

June 27, 2012

Owner Name
Institution Name
School Code
Address
City, State Zip

Subject: Institution Name
Operating Educational Institution without Proper Approval

Dear Owner Name:

The Bureau for Private Postsecondary Education (“Bureau”) regulates California’s private postsecondary educational institutions. It is the Bureau’s mandate to uphold and enforce the Private Postsecondary Education Act of 2009 (“the Act”) and corresponding regulations. The text of the Act and corresponding regulations is available on the Bureau’s website at www.bppe.ca.gov.

As of the date of this letter, the Bureau has not received an Application for Approval to Operate Accredited Institution from Institution Name. As the owner of Institution Name you are in violation of the Act section 94886.

Statutory Authority:

The Private Postsecondary Education Act of 2009 (the Act) provides in relevant part:

- “...a person shall not open, conduct, or do business as a private postsecondary educational institution in this state without obtaining an approval to operate under this chapter.” (California Education Code section 94886)
- “The following violations of this chapter are public offenses: (a) Knowingly operate a private postsecondary institution without an approval to operate is an infraction subject to the procedures described in Sections 19.6 and 19.7 of the Penal Code.” (California Education Code section 94943(a))

Owner Name

[Click here to enter a date](#)

Page 2

- “Notwithstanding any other provision of the law, the Bureau shall cite any person, and that person shall be subject to a fine not to exceed fifty thousand dollars (\$50,000), for operating an institution without proper approval to operate issued by the bureau pursuant to this chapter.” (California Education Code section 94944)

The Institution Name has not been issued an Approval to Operate by the Bureau. Therefore, the Bureau hereby orders that you cease operating as a private postsecondary educational institution and submit evidence of compliance to the Bureau within 14 days of the date of this order. This means you must stop enrolling students, and cease all instructional services, advertising (including Web sites), programs, and/or operations. Operation without Bureau approval will subject you to a fine up to \$50,000.00.

In addition, if the Institution Name currently has enrolled students, you must immediately contact the Bureau’s Closed School Unit pursuant to Title 5, California Code of Regulations section 76240 in order to notify the Bureau of your closure plans. The Closed School Unit’s telephone number is (916) 431-6931. Note additionally that pursuant to The Act section 94902(b), an enrollment agreement is not enforceable unless at the time of the execution of the enrollment agreement the institution held a valid approval to operate.

If you have any questions regarding this letter, please contact Title, Analyst Name by phone at (916) Phone Number or by e-mail at E-mail Address

Sincerely,

:analyst initials

cc: Closed School Unit,
Licensing Unit

Complaint Case Action Request Form

Analyst: _____ **Date Submitted:** _____
Complaint #: _____
School Name: _____
School Code: _____

Action Requested

Close Complaint

Date Closed in SAIL: _____

SAIL Closure Reason: _____

**Transfer
Complaint:**

From: _____

To: **Desk Investigation**
 Field Investigation
 Citation
 Discipline

Reason for Transfer: _____

Action Completed By:	Date Action Completed:
-----------------------------	-------------------------------



REQUEST FOR SITE VISIT

Date: _____ Region: _____

Manager: _____ Unit: _____
(first & last)

Analyst Name: _____ Phone Number: _____
(first & last)

Complaint Case Number: _____

INSTITUTION INFORMATION

Contact Name: _____ Contact Number: _____

Institution Name: _____

Address: _____ City _____

Institution Code: _____ Zip _____
(If Applicable)

Application Number: _____
(If Applicable)

REASON FOR SITE VISIT

Briefly describe request or issue:

Office Use Only:

Staff Assigned to Site Visit _____

Date of Site Visit _____

Initial and Date

Report Submitted to Enforcement _____



CLOSED SCHOOL REFERRAL

Date: _____

Manager: _____ Unit: _____
(first & last)

Analyst Name: _____ Phone Number: _____
(first & last)

ISSUE AND INFORMATION

Briefly describe request or issue:

INSTITUTION INFORMATION

Contact Name: _____ Contact Number: _____

Institution Name: _____

Address: _____ City _____

Institution Code: _____ Zip _____

Institution Status: _____

Office Use Only:

Initial and Date

Closed School Packet Mailed _____

Follow Up

School Closed in SAIL



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ENFORCEMENT REFERRAL

Enforcement Referral Date: **MM/DD/YY**
 Case No.:

Institution Name:		Institution Telephone:	
Institution Code:		Institution Address:	
Owner(s) Name:			

Analyst's Name:	
Approving Manager Name and Signature:	

Unit Referred From:	<input type="checkbox"/> Admin <input type="checkbox"/> Complaint Investigations <input type="checkbox"/> Compliance <input type="checkbox"/> Education Specialist <input type="checkbox"/> Licensing
---------------------	---

1. Reason for Referral:

2. Code Section(s) Violated: *(Describe how the school is in violation of each code section. Include any details regarding the nature and facts of the violation.)*

#	CEC/ CCR (include Subsection(s))	Description of Violation

3. Evidence: *(Provide supporting evidence that the school is in violation of the above mentioned code section(s). Provide copies of evidence as attachments or flag in the file where I can obtain the evidence.)*

#	Name of Document and Brief Description

Note: The “#” columns in sections 2 and 3 of this document should correspond with each other.

For Discipline Manager Use Only:

Refer to: <input type="checkbox"/> Desk Investigator <input type="checkbox"/> (Unlicensed) Desk Investigator <input type="checkbox"/> Field Investigator <input type="checkbox"/> Citation <input type="checkbox"/> Formal Discipline
Complaint Investigations/ Discipline Manager Approval Signature:



Bureau for Private Postsecondary Education Procedure

Title: Answering Phones for Complaints	Supersedes: None	Procedure #: 2013-0048
Procedure Owner: Enforcement	Effective: Immediately	Page: 1 of 2
Issue Date: May 20, 2013	Approved By: AURA METUNE Bureau Chief Bureau for Private Postsecondary Education	

Policy: Customer service is a high priority for the Bureau for Private Postsecondary Education (Bureau).

Purpose: This procedure outlines how you should provide telephone service to our customers.

Pursuant to the California Private Postsecondary Education Act of 2009 (Act), California Education Code (CEC) §94942(a) the bureau shall establish a toll free telephone number staffed by a bureau employee by which a student or a member of the public may file a complaint under this chapter.

Please remember when answering phones that these people are people and they have faults, are emotional, and are often tired of hearing “we can’t help you”. Your job is to provide a lending hand to their needs. Which means, even if their complaint sounds like it is not within our jurisdiction you still want to encourage them to file a complaint, that way they feel as though we have done our all. Make sure to include in your statement “filing a complaint is the first step to seeing if we can help you, I won’t be able to tell you what we can do without that first step being taken”.

If they are concerned with anonymity you can assure them that we don’t call the school and say “Mary Sue” filed a complaint but if the complaint goes to court we will have to release their name. Often times this is all a potential complainant needs to hear to feel comfortable with the idea of filing a complaint.

Procedures:

Task	Who is Responsible
1. Introduce the Bureau and yourself. (i.e. "Bureau for Private Postsecondary Education, this is (your name), how may I assist you?	All Staff
2. If you get questions referencing compliance or licensing issues transfer the call to the appropriate person within those units: A. Licensing – The licensing main line or an available OT B. Compliance – Identify if it is Northern or Southern Compliance and transfer that call to the appropriate OT.	All Staff
3. When transferring calls make sure to first place the caller on hold, contact the transferee and tell them who the person is, who they are with and what the inquiry is regarding so they have a heads up before taking the call. Do not blind transfer calls.	All Staff



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