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7

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

12 In the Matter of the Statement of Issues
Against:

Case No. 1002479

13 **EDISON TRUCK AND BUS DRIVING
SCHOOL, INC.**

STATEMENT OF ISSUES

14 **Renewal of Approval to Operate a Non-
Accredited Institution Applicant**

15 **Institution Code: 1937251**

16 Respondent.
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20 Complainant alleges:

21 **PARTIES**

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

25 2. On or about May 28, 2013, the Bureau for Private Postsecondary Education received
26 an application for Renewal of Approval to Operate a Non-Accredited Institution from Edison
27 Truck and Bus Driving School, Inc., (Respondent). On or about May 17, 2013, Edison D. Freire
28

1 certified under penalty of perjury to the truthfulness of all statements, answers, and
2 representations in the application. The Bureau denied the application on February 7, 2017.

3
4 **JURISDICTION**

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

9 4. California Business and Professions Code Section 118, subdivision (b) provides, in
10 part:

11 “(b) The suspension, expiration, or forfeiture by operation of law of a license issued by a
12 board in the department, or its suspension, forfeiture, or cancellation by order of the board or by
13 order of a court of law, or its surrender without the written consent of the board, shall not, during
14 any period in which it may be renewed, restored, reissued, or reinstated, deprive the board of its
15 authority to institute or continue a disciplinary proceeding against the licensee upon any ground
16 provided by law or to enter an order suspending or revoking the license or otherwise taking
17 disciplinary action against the licensee on any such ground.

18 5. Section 94887 of the Education Code states that an approval to operate shall be
19 granted only after an applicant has presented sufficient evidence to the bureau, and the bureau has
20 independently verified the information provided by the applicant through site visits or other
21 methods deemed appropriate by the bureau, that the applicant has the capacity to satisfy the
22 minimum operating standards. The bureau shall deny an application for an approval to operate if
23 the application does not satisfy those standards.

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1 **STATUTORY PROVISIONS**

2 6. Section 94891 of the Education Code states:

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

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

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

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

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

18 7. Section 94897 of the Education Code states:

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

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

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

23 (2) The institution is a public institution.”

24 8. Section 94909 of the Education Code states:

25 “(a) Except as provided in subdivision (d), prior to enrollment, an institution shall provide a
26 prospective student, either in writing or electronically, with a school catalog containing, at a
27 minimum, all of the following:

28 ...

1 (2) Except as specified in Article 2 (commencing with Section 94802), a statement that the
2 institution is a private institution and that it is approved to operate by the bureau.

3 ...

4 (4) The address or addresses where class sessions will be held.

5 ...

6 (6) If the educational program is designed to lead to positions in a profession, occupation,
7 trade, or career field requiring licensure in this state, a notice to that effect and a list of the
8 requirements for eligibility for licensure.

9 (8) A detailed description of institutional policies in the following areas:

10 ...

11 (E) Leave-of-absence policies.

12 (9) The schedule of total charges for a period of attendance and an estimated schedule of
13 total charges for the entire educational program.

14 (10) A statement reporting whether the institution participates in federal and state financial
15 aid programs, and if so, all consumer information that is required to be disclosed to the student
16 pursuant to the applicable federal and state financial aid programs.

17 (11) A statement specifying that, if a student obtains a loan to pay for an educational
18 program, the student will have the responsibility to repay the full amount of the loan plus interest,
19 less the amount of any refund, and that, if the student has received federal student financial aid
20 funds, the student is entitled to a refund of the moneys not paid from federal student financial aid
21 program funds.

22 ...

23 (14) A description of the student's rights and responsibilities with respect to the Student
24 Tuition Recovery Fund. This statement shall specify that it is a state requirement that a student
25 who pays his or her tuition is required to pay a state-imposed assessment for the Student Tuition
26 Recovery Fund. This statement shall also describe the purpose and operation of the Student
27 Tuition Recovery Fund and the requirements for filing a claim against the Student Tuition
28 Recovery Fund.

1 (15) The following statement:

2 "NOTICE CONCERNING TRANSFERABILITY OF CREDITS AND CREDENTIALS
3 EARNED AT OUR INSTITUTION"

4 The transferability of credits you earn at (name of institution) is at the complete discretion
5 of an institution to which you may seek to transfer. Acceptance of the (degree, diploma, or
6 certificate) you earn in (name of educational program) is also at the complete discretion of the
7 institution to which you may seek to transfer. If the (credits or degree, diploma, or certificate) that
8 you earn at this institution are not accepted at the institution to which you seek to transfer, you
9 may be required to repeat some or all of your coursework at that institution. For this reason you
10 should make certain that your attendance at this institution will meet your educational goals. This
11 may include contacting an institution to which you may seek to transfer after attending (name of
12 institution) to determine if your (credits or degree, diploma, or certificate) will transfer."

13 (16) A statement specifying whether the institution, or any of its degree programs, are
14 accredited by an accrediting agency recognized by the United States Department of Education. If
15 the institution is unaccredited and offers an associate, baccalaureate, master's, or doctoral degree,
16 or is accredited and offers an unaccredited program for an associate, baccalaureate, master's, or
17 doctoral degree, the statement shall disclose the known limitations of the degree program,
18 including, but not limited to, all of the following:

19 (A) Whether a graduate of the degree program will be eligible to sit for the applicable
20 licensure exam in California and other states or become certified or registered as required for the
21 applicable profession, occupation, trade, or career field in California.

22 (B) A degree program that is unaccredited or a degree from an unaccredited institution is
23 not recognized for some employment positions, including, but not limited to, positions with the
24 State of California.

25 (C) That a student enrolled in an unaccredited institution is not eligible for federal financial
26 aid programs."

27 9. Section 94911 of the Education Code states:

28 "An enrollment agreement shall include, at a minimum, all of the following:

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(c) In underlined capital letters on the same page of the enrollment agreement in which the student's signature is required, the total charges for the current period of attendance, the estimated total charges for the entire educational program, and the total charges the student is obligated to pay upon enrollment.

...

(e) (1) A disclosure with a clear and conspicuous caption, 'STUDENT'S RIGHT TO CANCEL,' under which it is explained that the student has the right to cancel the enrollment agreement and obtain a refund of charges paid through attendance at the first class session, or the seventh day after enrollment, whichever is later.

...

(f) A statement specifying that, if the student obtains a loan to pay for an educational program, the student will have the responsibility to repay the full amount of the loan plus interest, less the amount of any refund.

(g) A statement specifying that, if the student is eligible for a loan guaranteed by the federal or state government and the student defaults on the loan, both of the following may occur:

(1) The federal or state government or a loan guarantee agency may take action against the student, including applying any income tax refund to which the person is entitled to reduce the balance owed on the loan.

(2) The student may not be eligible for any other federal student financial aid at another institution or other government assistance until the loan is repaid.

(h) The transferability disclosure that is required to be included in the school catalog, as specified in paragraph (15) of subdivision (a) of Section 94909.”

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REGULATORY PROVISIONS

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2 10. California Code of Regulations, title 5, section 71700 states that the bureau may
3 request that an institution document compliance with the standards set forth in the Act and this
4 Division to obtain and maintain an approval to operate.

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

6 ...

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

11 ...

12 “(kk) An incomplete application filed under this section will render the institution ineligible
13 for renewal.”

14 12. California Code of Regulations, title 5, section 71800(b) states in pertinent:

15 “In addition to the requirements of section 94911 of the Code, an institution shall provide to
16 each student an enrollment agreement that contains at least the following information:

17 ...

18 “(b) Period covered by the enrollment agreement.”

19 13. California Code of Regulations, title 5, section 71810 states in pertinent:

20 ...

21 “(b) The catalog shall contain the information prescribed by Section 94909 of the Code and
22 all of the following:

23 ...

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

26 ...

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

4 ...

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

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

9 ...

10 (13) Housing information including all of the following:

11 ...

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

14 ...

15 (15) Policies on the retention of student records.”

16 14. California Code of Regulations, title 5, section 74115(d) states in pertinent part:

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

19 ...

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

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1 15. California Code of Regulations, title 5, section 76215(a) states:

2 “(a) A qualifying institution shall include the following statement on both its enrollment
3 agreement and school catalog:

4 ‘The State of California established the Student Tuition Recovery Fund (STRF) to relieve
5 or mitigate economic loss suffered by a student in an educational program at a qualifying
6 institution, who is or was a California resident while enrolled, or was enrolled in a residency
7 program, if the student enrolled in the institution, prepaid tuition, and suffered an economic loss.
8 Unless relieved of the obligation to do so, you must pay the state-imposed assessment for the
9 STRF, or it must be paid on your behalf, if you are a student in an educational program, who is a
10 California resident, or are enrolled in a residency program, and prepay all or part of your tuition.

11 You are not eligible for protection from the STRF and you are not required to pay the STRF
12 assessment, if you are not a California resident, or are not enrolled in a residency program.’

13 (b) In addition to the statement required under subdivision (a) of this section, a qualifying
14 institution shall include the following statement in its school catalog:

15 ‘It is important that you keep copies of your enrollment agreement, financial aid
16 documents, receipts, or any other information that documents the amount paid to the school.
17 Questions regarding the STRF may be directed to the Bureau for Private Postsecondary
18 Education, 2535 Capitol Oaks Drive, Suite 400, Sacramento, CA 95833, (916) 431-6959 or (888)
19 370-7589.

20 To be eligible for STRF, you must be a California resident or are enrolled in a residency
21 program, prepaid tuition, paid or deemed to have paid the STRF assessment, and suffered an
22 economic loss as a result of any of the following:

23 1. The institution, a location of the institution, or an educational program offered by the
24 institution was closed or discontinued, and you did not choose to participate in a teach-out plan
25 approved by the Bureau or did not complete a chosen teach-out plan approved by the Bureau.

26 2. You were enrolled at an institution or a location of the institution within the 120 day
27 period before the closure of the institution or location of the institution, or were enrolled in an
28 educational program within the 120 day period before the program was discontinued.

1 3. You were enrolled at an institution or a location of the institution more than 120 days
2 before the closure of the institution or location of the institution, in an educational program
3 offered by the institution as to which the Bureau determined there was a significant decline in the
4 quality or value of the program more than 120 days before closure.

5 4. The institution has been ordered to pay a refund by the Bureau but has failed to do so.

6 5. The institution has failed to pay or reimburse loan proceeds under a federal student
7 loan program as required by law, or has failed to pay or reimburse proceeds received by the
8 institution in excess of tuition and other costs.

9 6. You have been awarded restitution, a refund, or other monetary award by an
10 arbitrator or court, based on a violation of this chapter by an institution or representative of an
11 institution, but have been unable to collect the award from the institution.

12 7. You sought legal counsel that resulted in the cancellation of one or more of your
13 student loans and have an invoice for services rendered and evidence of the cancellation of the
14 student loan or loans.

15 To qualify for STRF reimbursement, the application must be received within four (4) years
16 from the date of the action or event that made the student eligible for recovery from STRF.

17 A student whose loan is revived by a loan holder or debt collector after a period of
18 noncollection may, at any time, file a written application for recovery from STRF for the debt that
19 would have otherwise been eligible for recovery. If it has been more than four (4) years since the
20 action or event that made the student eligible, the student must have filed a written application for
21 recovery within the original four (4) year period, unless the period has been extended by another
22 act of law.

23 However, no claim can be paid to any student without a social security number or a
24 taxpayer identification number.”

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1 *Enrollment Agreement Violations*

2 **FIRST CAUSE FOR DENIAL OF APPLICATION**

3 (Failure To Include Time Period Covered By Enrollment Agreement)

4 16. Respondent's application is subject to denial in that Respondent failed to comply
5 with California Code of Regulations, title 5, section 71800, subdivision (b). In particular,
6 exemplars of student enrollment agreements provided in support of Respondent's application did
7 not contain the time period covered by the enrollment agreement.

8
9 **SECOND CAUSE FOR DENIAL OF APPLICATION**

10 (Failure To Provide Student Tuition Recovery Fund Information)

11 17. Respondent's application is subject to denial in that exemplars of student
12 enrollment agreements did not contain the required disclosures for the Student Tuition Recovery
13 Fund as provided by California Code of Regulations, title 5, section 76215, subdivisions (a) – (b).

14
15 **THIRD CAUSE FOR DENIAL OF APPLICATION**

16 (Failure To Provide Total Charges For Attendance)

17 18. Respondent's application is subject to denial in that Respondent failed to comply
18 with California Education Code (Code) section 94911, subdivision (c) in that exemplars of
19 student enrollment agreements did not contain in underlined capital letters, the total charges for
20 the period of attendance, the estimated total charges for the entire educational program and the
21 total charges the student is obligated to pay upon enrollment, on the same page as the student's
22 signature.

23
24 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

25 (Inadequate 'Student Right To Cancel' Language)

26 19. Respondent's application is subject to denial in that Respondent failed to comply
27 with California Education Code (Code) section 94911, subdivision (e)(1). Specifically, the
28

1 student enrollment agreement does not contain the verbatim, required 'Student's Right to Cancel'
2 disclosure language.

3
4 **FIFTH CAUSE FOR DENIAL OF APPLICATION**

5 (Failure To Describe Loan Responsibility)

6 20. Respondent's application is subject to denial in that Respondent failed to comply
7 with California Education Code (Code) section 94911, subdivision (f). Specifically, the student
8 enrollment agreement did not include a statement that if the student obtains a loan to pay for an
9 educational program, the student is responsible to repay the loan in full, plus interest, less the
10 amount of any refund.

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12 **SIXTH CAUSE FOR DENIAL OF APPLICATION**

13 (Failure To Describe Consequences Of Loan Default)

14 21. Respondent's application is subject to denial in that Respondent failed to comply
15 with California Education Code (Code) section 94911, subdivisions (g)(1) – (g)(2) in that the
16 student enrollment agreement did not include a statement specifying the consequences of default
17 on a loan granted by the Federal and State government.

18
19 **SEVENTH CAUSE FOR DENIAL OF APPLICATION**

20 (Failure To Include Credit Transfer Disclosures)

21 22. Respondent's application is subject to denial in that Respondent failed to comply
22 with California Education Code (Code) section 94911, subdivision (h) and section 94909,
23 subdivision (a)(15) in that the enrollment agreement did not include the caption, "Notice
24 Concerning Transferability of Credits and Credentials Earned At Our Institution" followed by the
25 required transferability disclosures.

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1 **EIGHTH CAUSE FOR DENIAL OF APPLICATION**

2 (Failure To State The Consequences of Loan Default)

3 23. Respondent's application is subject to denial in that Respondent failed to comply
4 with Code section 94911, subdivision (g)(2) in that the enrollment agreement did not include a
5 statement specifying that if the student is eligible for a loan guaranteed by the federal or state
6 government and defaults, that the student may not be eligible for any other federal student
7 financial aid at another institution or other government assistance until the loan is paid.

8
9 *Catalog Violations*

10 **NINTH CAUSE FOR DENIAL OF APPLICATION**

11 (Failure To State The Institution Is Private/Bureau Approved)

12 24. Respondent's application is subject to denial in that Respondent failed to comply
13 with Code section 94909, subdivision (a)(2) and section 94897, subdivisions (i)(1) – (2).
14 Specifically, Respondent's institution catalog did not include the required statement that the
15 institution is private and approved to operate by the Bureau.

16
17 **TENTH CAUSE FOR DENIAL OF APPLICATION**

18 (Failure To State Where Classes Will Be Held)

19 25. Respondent's application is subject to denial in that Respondent failed to comply
20 with Code section 94909, subdivision (a)(4). Specifically, Respondent's institution catalog did
21 not include the address(es) where class sessions will be held.

22
23 **ELEVENTH CAUSE FOR DENIAL OF APPLICATION**

24 (Failure To Provide Licensure Requirements)

25 26. Respondent's application is subject to denial in that Respondent failed to comply
26 with Code section 94909, subdivision (a)(6). Specifically, the institution catalog did not include a
27 notice and a list of the requirements for eligibility for licensure in a profession, occupation, trade
28 or career field for which the program is designed.

1 **TWELFTH CAUSE FOR DENIAL OF APPLICATION**

2 (Failure To Describe Leave-Of-Absence Policies)

3 27. Respondent’s application is subject to denial in that Respondent failed to comply
4 with Code section 94909, subdivision (a)(8)(e) in that the catalog did not include the institution’s
5 leave-of-absence policies.

6
7 **THIRTEENTH CAUSE FOR DENIAL OF APPLICATION**

8 (Failure To Provide Total Charges)

9 28. Respondent’s application is subject to denial in that Respondent failed to comply
10 with Code section 94909, subdivision (a)(9). Specifically, the institution’s catalog did not include
11 a schedule of total charges for a period of attendance and an estimated schedule of total charges
12 for the entire educational program.

13
14 **FOURTEENTH CAUSE FOR DENIAL OF APPLICATION**

15 (Failure To Clarify Policies Regarding Financial Aid)

16 29. Respondent’s application is subject to denial in that Respondent failed to comply
17 with Code section 94909, subdivision (a)(10) in conjunction with California Code of Regulations,
18 title 5, section 71810, subdivision (b)(6) in that Respondent failed to clarify and provide all
19 consumer information pertaining to whether or not it participates in federal and state financial aid
20 programs. Specifically, in one statement, Respondent’s catalog indicates that the school does not
21 provide state or federal forms of financial aid, however in another statement, Respondent
22 provides information regarding the availability of financial assistance from the Employment
23 Development Department, Rehabilitation and State Fund – workers compensation.

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FIFTEENTH CAUSE FOR DENIAL OF APPLICATION

(Failure To Describe Student Loan Responsibility/Refunds)

30. Respondent's application is subject to denial in that Respondent failed to comply with Code section 94909, subdivision (a)(11). Specifically, the institution catalog did not include a statement specifying that, if a student obtains a loan to pay for an educational program, the student will have the responsibility to repay the full amount of the loan plus interest, less the amount of any refund, and that, if the student has received federal student financial aid funds, the student is entitled to a refund of the moneys not paid from federal student financial aid program funds.

SIXTEENTH CAUSE FOR DENIAL OF APPLICATION

(Failure To Provide Student Tuition Recovery Fund Information)

31. Respondent's application is subject to denial in that Respondent failed to comply with Code section 94909, subdivision (a)(14). Specifically, the institution catalog did not include a description of the students' rights and responsibilities with respect to the Student Tuition Recovery Fund.

SEVENTEENTH CAUSE FOR DENIAL OF APPLICATION

(Failure To Include Credit Transfer Disclosures)

32. Respondent's application is subject to denial in that Respondent failed to comply with Code section 94911, subdivision (h) and section 94909, subdivision (a)(15) in that the catalog did not include the caption, "Notice Concerning Transferability of Credits and Credentials Earned At Our Institution" followed by the required transferability disclosures.

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1 **TWENTY-SECOND CAUSE FOR DENIAL OF APPLICATION**

2 (Failure To Describe Proximate Housing Accommodations)

3 37. Respondent's application is subject to denial in that Respondent failed to comply
4 with California Code of Regulations, title 5, section 71810, subdivision (b)(13)(B). Specifically,
5 Respondent's institution catalog failed to provide information pertaining to the availability of
6 housing located reasonably near the institution and the approximate cost or range of such housing.

7
8 **TWENTY-THIRD CAUSE FOR DENIAL OF APPLICATION**

9 (Failure To Provide Record Retention Policies)

10 38. Respondent's application is subject to denial in that Respondent failed to comply
11 with California Code of Regulations, title 5, section 71810, subdivision (b)(15). Specifically,
12 Respondent's catalog failed to provide information about the institution's policies on retention of
13 student records.

14
15 **TWENTY-FOURTH CAUSE FOR DENIAL OF APPLICATION**

16 (Failure To Provide Record Retention Policies)

17 39. Respondent's application is subject to denial in that Respondent failed to comply
18 with California Code of Regulations, title 5, section 71810, subdivision (b)(15). Specifically,
19 Respondent's catalog failed to provide information about the institution's policies on retention of
20 student records.

21
22 *Financial Resources and Statements*

23 **TWENTY-FIFTH CAUSE FOR DENIAL OF APPLICATION**

24 (Failure To Provide Current Financial Statements)

25 40. Respondent's application is subject to denial in that Respondent failed to comply
26 with California Code of Regulations, title 5, sections 71475, subdivisions (e) and (kk), 71810 and
27 74115 subdivision (d). Specifically, Respondent failed to provide current financial statements in
28 compliance with statutory requirements.

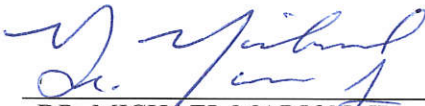
PRAYER

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

1. Denying the application of Edison Truck and Bus Driving School, Inc., for a Renewal of Approval to Operate a Non-Accredited Institution;
2. Taking such other and further action as deemed necessary and proper.

DATED:

11/15/17



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

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