



Bureau for Private Postsecondary Education
 2535 Capitol Oaks Drive, Suite 400, Sacramento, CA 95833
 P.O. Box 980818, West Sacramento, CA 95798-0818
 P (916) 431-6959 F (916) 263-1897 www.bppe.ca.gov



NOTICE TO COMPLY – CA 3803121 0614 (Ed. Code § 94935, 5 CCR § 75010)

Institution Name:	St Giles Colleges, Inc.	Institution Telephone:	415-788-3552
Institution Code:	3803121	Administrator Name:	Megan McEnulty
Street Address:	785 Market Street # 300 San Francisco, CA 94103	Date of Inspection:	09 JUNE 2014

Nature and Facts of the Violation(s):

Education Code	Subsection and Description
94902: General Enrollment Requirements	<p>(a) A student shall enroll solely by means of executing an enrollment agreement. The enrollment agreement shall be signed by the student and by an authorized employee of the institution.</p> <p>There is not a space for an authorized employee signature on the Enrollment Agreement</p>
94911: Minimum Requirements for Enrollment Agreement	<p>An enrollment agreement shall include, at a minimum, all of the following:</p> <p>(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.</p> <p>The required verbiage is not underlined AND capitalized.</p>
94911: Minimum Requirements for Enrollment Agreement	<p>An enrollment agreement shall include, at a minimum, all of the following:</p> <p>(d) A clear and conspicuous statement that the enrollment agreement is legally binding when signed by the student and accepted by the institution.</p> <p>The required language is not present.</p>
94911: Minimum Requirements for Enrollment Agreement	<p>An enrollment agreement shall include, at a minimum, all of the following:</p> <p>(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. (2) The disclosure shall contain the institution's refund policy and a statement that, if the student has received federal student financial aid funds, the student is entitled to a refund of moneys not paid from federal student financial aid program funds. (3) The text shall also include a description of the procedures that a</p>

Notice to Comply – CA 3803121 0614
 Inspector's Initial: BJB
 Administrator's Initial: MM

	<p>student is required to follow to cancel the enrollment agreement or withdraw from the institution and obtain a refund.</p> <p>The required language is not present.</p>
94911: Minimum Requirements for Enrollment Agreement	<p>An enrollment agreement shall include, at a minimum, all of the following:</p> <p>(f) A statement specifying that, if the student obtains a loan to pay for an educational program, the student will have the responsibility to repay the full amount of the loan plus interest, less the amount of any refund.</p> <p>The required language is not present.</p>
94911: Minimum Requirements for Enrollment Agreement	<p>An enrollment agreement shall include, at a minimum, all of the following:</p> <p>(h) The transferability disclosure that is required to be included in the school catalog, as specified in paragraph (15) of subdivision (a) of Section 94909.</p> <p>The required language is not present.</p>
94943.5: Agent for Service of Process	<p>An institution shall designate and maintain an agent for service of process within this state, and provide the name, address, and telephone number of the agent to the bureau. The bureau shall furnish the agent's name, address, and telephone number to a person upon request.</p> <p>As currently listed, the Agent for Service of Process is at the same address as the institution.</p>
94909: Minimum Requirements for School Catalog	<p>(a) Prior to enrollment, an institution shall provide a prospective student, either in writing or electronically, with a school catalog containing, at a minimum, all of the following:</p> <p>(1) The name, address, telephone number, and, if applicable, Internet Web site address of the institution.</p> <p>The information indicated on page 6 for this item is insufficient – it only says San Francisco, The information on the back cover is sufficient.</p>
94909: Minimum Requirements for School Catalog	<p>(a)(2) Except as specified in Article 2 (commencing with Section 94802), a statement that the institution is a private institution and that it is approved to operate by the bureau.</p> <p>This information must appear in the catalog.</p>
94909: Minimum Requirements for School Catalog	<p>(a)(3) The following statements:</p> <p>(A) "Any questions a student may have regarding this catalog that have not been satisfactorily answered by the institution may be directed to the Bureau for Private Postsecondary Education at (address), Sacramento, CA (ZIP Code), (Internet Web site address), (telephone and fax numbers)."</p> <p>This information must appear in the catalog.</p>

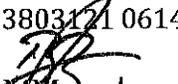
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(3) The following statements: (B) "As a prospective student, you are encouraged to review this catalog prior to signing an enrollment agreement. You are also encouraged to review the School Performance Fact Sheet, which must be provided to you prior to signing an enrollment agreement."</p> <p>This information must appear in the catalog.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(3) The following statements: (C) "A student or any member of the public may file a complaint about this institution with the Bureau for Private Postsecondary Education by calling (toll-free telephone number) or by completing a complaint form, which can be obtained on the bureau's Internet Web site (Internet Web site address)."</p> <p>This information must appear in the catalog.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(4) The address or addresses where class sessions will be held.</p> <p>There is no address present for the school location on page 6.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(5) A description of the programs offered and a description of the instruction provided in each of the courses offered by the institution, the requirements for completion of each program, including required courses, any final tests or examinations, any required internships or externships, and the total number of credit hours, clock hours, or other increments required for completion.</p> <p>The information indicated on pages 7, 8 & 12 of the Teacher Training booklet does not meet all the minimum requirements - there is no indication of the total credit hours, clock hours or other increments for completion. The information is broken down by Units 1 - 5, but there is no indication of how long each Unit is (hours, days, weeks or other unit of measurement). The only such measurement we found was indicated under Component One: Teaching Practice, which indicates the student will teach for a total of 6 hours.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(6) If the educational program is designed to lead to positions in a profession, occupation, trade, or career field requiring licensure in this state, a notice to that effect and a list of the requirements for eligibility for licensure.</p> <p>Verbiage must appear indicating St Giles' instruction does not lead to licensure, etc. However, if the Teacher Training program is designed to lead to employment in the field of English language instruction, verbiage must appear indicating such, even if there is no licensure for such teachers at this level.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(7) Information regarding the faculty and their qualifications.</p> <p>The requirements of 71720: Faculty, must be met when completing this section. Faculty degrees, credentials and minimum 3 years' experience are mandatory.</p>

Notice to Comply - CA 3803121 0614

Inspector's Initial: BJB

Administrator's Initial: *MM*

<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(8) A detailed description of institutional policies in the following areas: (A) Admissions policies, including the institution's policies regarding the acceptance of credits earned at other institutions or through challenge examinations and achievement tests, admissions requirements for ability-to-benefit students, and a list describing any transfer or articulation agreements between the institution and any other college or university that provides for the transfer of credits earned in the program of instruction. If the institution has not entered into an articulation or transfer agreement with any other college or university, the institution shall disclose that fact.</p> <p>This required verbiage must indicate whether St Giles does or does not accept credits from other schools, etc.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(8) A detailed description of institutional policies in the following areas: (D) Attendance policies.</p> <p>This information must appear in the catalog.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(8) A detailed description of institutional policies in the following areas: (E) Leave-of-absence policies.</p> <p>This information must appear in the catalog.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(9) The schedule of total charges for a period of attendance and an estimated schedule of total charges for the entire educational program.</p> <p>This information must appear in the catalog.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(10) A statement reporting whether the institution participates in federal and state financial aid programs, and if so, all consumer information that is required to be disclosed to the student pursuant to the applicable federal and state financial aid programs.</p> <p>This information must appear in the catalog.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(11) 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.</p> <p>This information must appear in the catalog.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(12) A statement specifying whether the institution has a pending petition in bankruptcy, is operating as a debtor in possession, has filed a petition within the preceding five years, or has had a petition in bankruptcy filed against it within the preceding five years that resulted in reorganization under Chapter 11 of the United States Bankruptcy Code (11 U.S.C. Sec. 1101 et seq.).</p>

Notice to Comply – CA 3803121 0614
Inspector's Initial: BJB 
Administrator's Initial: 

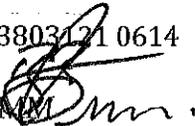
	<p>This information must appear in the catalog.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(14) A description of the student's rights and responsibilities with respect to the Student Tuition Recovery Fund. This statement shall specify that it is a state requirement that a student who pays his or her tuition is required to pay a state-imposed assessment for the Student Tuition Recovery Fund. This statement shall also describe the purpose and operation of the Student Tuition Recovery Fund and the requirements for filing a claim against the Student Tuition Recovery Fund.</p> <p>This information must appear in the catalog.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(15) The following statement: "NOTICE CONCERNING TRANSFERABILITY OF CREDITS AND CREDENTIALS EARNED AT OUR INSTITUTION The transferability of credits you earn at (name of institution) is at the complete discretion of an institution to which you may seek to transfer. Acceptance of the (degree, diploma, or certificate) you earn in (name of educational program) is also at the complete discretion of the institution to which you may seek to transfer. If the (credits or degree, diploma, or certificate) that you earn at this institution are not accepted at the institution to which you seek to transfer, you may be required to repeat some or all of your coursework at that institution. For this reason you should make certain that your attendance at this institution will meet your educational goals. This may include contacting an institution to which you may seek to transfer after attending (name of institution) to determine if your (credits or degree, diploma or certificate) will transfer."</p> <p>This information must appear in the catalog.</p>
<p>94909: Minimum Requirements for School Catalog</p>	<p>(a)(16) A statement specifying whether the institution, or any of its degree programs, are accredited by an accrediting agency recognized by the United States Department of Education. If the institution is unaccredited and offers an associate, baccalaureate, master's, or doctoral degree, or is accredited and offers an unaccredited program for an associate, baccalaureate, master's, or doctoral degree, the statement shall disclose the known limitations of the degree program, including, but not limited to, all of the following:</p> <p>(A) Whether a graduate of the degree program will be eligible to sit for the applicable licensure exam in California and other states. (B) A degree program that is unaccredited or a degree from an unaccredited institution is not recognized for some employment positions, including, but not limited to, positions with the State of California. (C) That a student enrolled in an unaccredited institution is not eligible for federal financial aid programs.</p> <p>(b) If the institution has a general student brochure, the institution shall provide that brochure to the prospective student prior to enrollment. In addition, if the institution has a program-specific</p>

	<p>student brochure for the program in which the prospective student seeks to enroll, the institution shall provide the program-specific student brochure to the prospective student prior to enrollment.</p> <p>(c) An institution shall provide the school catalog to any person upon request. In addition, if the institution has student brochures, the institution shall disclose the requested brochures to any interested person upon request.</p> <p>This information must appear in the catalog.</p>
<p>94913: Website</p>	<p>(a) An institution that maintains an Internet Web site shall provide on that Internet Web site all of the following:</p> <p>(1) The school catalog.</p> <p>The collection of booklets St Giles submitted does not qualify as a catalog per <u>94909 CEC & 71810 CCR.</u></p> <p>(2) A School Performance Fact Sheet for each educational program offered by the institution.</p> <p>The School Performance Fact Sheet (SPFS) is insufficient as it does not disclose the required information for every educational program, as required by <u>94910 CEC & 74112 CCR.</u></p> <p>(4) A link to the bureau's Internet Web site.</p> <p>The website address needs to appear.</p> <p>(5) The institution's most recent annual report submitted to the bureau.</p> <p>The Annual Report which appears on the St Giles website at <u>http://www.stgiles-international.com/downloads/Accreditation/bppe2012.pdf</u>, page 2 of the document does not list a link to the institution's website, a link to the School Performance Fact Sheet on the school's website, or a link to the catalog on the school's website. Also on page 2, St Giles indicates there are 1 Degree or Certificate programs offered (presumably to indicate the CELTA program, which would be correct), however there is no information disclosed in the following pages concerning the CELTA program – only the English Language program. In this information concerning the English Language program, it is indicated the program is 'avocational', however the English Language program does not meet the avocational definition per <u>94918 CEC.</u></p> <p>(b) An institution shall include information concerning where students may access the bureau's Internet Web site anywhere the institution identifies itself as being approved by the bureau.</p> <p>No such statement with this verbiage was located on the web</p>

Code of Regulations	Subsection and Description
71770: Admissions Standards and Transferred Credits Policy	<p>(b) The institution shall specify the maximum credit it will transfer from another institution for each educational program, and the basis upon which the transferred credit will be awarded.</p> <p>(1) Except as limited by subdivision (c) of this section, a maximum of 75 percent of the units or credit that may be applied toward the award of a bachelor's degree may be derived from a combination of any or both of the following:</p> <p>(A) Units earned at institutions approved by the Bureau, public or private institutions of higher learning accredited by an accrediting association recognized by the U. S. Department of Education, or any institution of higher learning, including foreign institutions, if the institution offering the undergraduate program documents that the institution of higher learning at which the units were earned offers degree programs equivalent to degree programs approved by the Bureau or accredited by an accrediting association recognized by the U.S. Department of Education;</p> <p>(B) Challenge examinations and standardized tests such as the College Level Placement Tests (CLEP) for specific academic disciplines.</p> <p>(2) No more than 20% of graduate semester units or the equivalent in other units awarded by another institution may be transferred for credit toward a Master's degree. An institution may accept transfer credits only from the institutions of higher learning described in subsection (1)(A).</p> <p>(3) No more than 30 graduate semester credits or its equivalent awarded by another institution may be credited toward a doctoral degree. This subdivision does not apply to graduate programs that lead to a profession or an occupation requiring state licensure where the licensing agency has a regulation permitting a different standard.</p> <p>(c) If credit for prior experiential learning is to be granted, the policy for granting such credit shall be included in the institution's catalog.</p> <p>(1) An institution may grant credit to a student for prior experiential learning only if:</p> <p>(A) The prior learning is equivalent to a college or university level of learning;</p> <p>(B) The learning experience demonstrates a balance between theory and practice and;</p> <p>(C) The credit awarded for the prior learning experience directly relates to the student's degree program and is applied in satisfaction of some of the degree requirements.</p> <p>(2) Each college or university level learning experience for which credit is sought shall be documented by the student in writing.</p> <p>(3) Each college or university level learning experience shall be evaluated by faculty qualified in that specific subject area who shall ascertain (1) to what college or university level learning the student's prior experience is equivalent and (2) how many credits</p>

Notice to Comply – CA 3803121 0614

Inspector's Initial: BJB

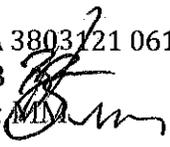
Administrator's Initial: 

	<p>toward a degree may be granted for that experience.</p> <p>This information must appear in the catalog.</p>
71800: Enrollment Agreement	<p>In addition to the requirements of section 94911 of the Code, an institution shall provide to each student an enrollment agreement that contains at the least the following information:</p> <p>(b) Period covered by the enrollment agreement.</p> <p>This information must appear in the catalog.</p> <p>(d) Date by which the student must exercise his or her right to cancel or withdraw, and the refund policy, including any alternative method of calculation if approved by the Bureau pursuant to section 94921 of the Code.</p> <p>This information must appear in the catalog.</p>
71810: Catalog	<p>(a) Each institution shall provide a catalog pursuant to section 94909 of the Code, which shall be updated annually. Annual updates may be made by the use of supplements or inserts accompanying the catalog. If changes in educational programs, educational services, procedures, or policies required to be included in the catalog by statute or regulation are implemented before the issuance of the annually updated catalog, those changes shall be reflected at the time they are made in supplements or inserts accompanying the catalog.</p> <p>(b) The catalog shall contain the information prescribed by Section 94909 of the Code and all of the following:</p> <p>(6) The institution's policies and practices regarding any form of financial aid, including all consumer information which the institution is required to disclose to the student under any state or federal financial aid program;</p> <p>This information must appear in the catalog.</p> <p>(7) The institution's policies and procedures for the award of credit for prior experiential learning, including assessment policies and procedures, provisions for appeal, and all charges that a student may be required to pay;</p> <p>This information must appear in the catalog.</p> <p>(11) If the institution offers distance education, the approximate number of days that will elapse between the institution's receipt of student lessons, projects, or dissertations and the institution's mailing of its response or evaluation.</p> <p>This information must appear in the catalog.</p> <p>(14) Policies on student rights, including the procedure for addressing student grievances; and</p>

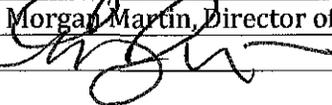
	<p>This information must appear in the catalog.</p> <p>(15) Policies on the retention of student records. Note: Authority cited: Sections 94803, 94877 and 94885, Education Code. Reference: Sections 94885 and 94909, Education Code.</p> <p>This information must appear in the catalog.</p>
<p>76215: Student Tuition Recovery Fund Disclosures</p>	<p>76215. Student Tuition Recovery Fund Disclosures.</p> <p>(a) A qualifying institution shall include the following statement on both its enrollment agreement for an educational program and its current schedule of student charges: "You must pay the state-imposed assessment for the Student Tuition Recovery Fund (STRF) if all of the following applies to you: 1. You are a student in an educational program, who is a California resident, or are enrolled in a residency program, and prepay all or part of your tuition either by cash, guaranteed student loans, or personal loans, and 2. Your total charges are not paid by any third-party payer such as an employer, government program or other payer unless you have a separate agreement to repay the third party. You are not eligible for protection from the STRF and you are not required to pay the STRF assessment, if either of the following applies: 1. You are not a California resident, or are not enrolled in a residency program, or 2. Your total charges are paid by a third party, such as an employer, government program or other payer, and you have no separate agreement to repay the third party."</p>
<p>76215: Student Tuition Recovery Fund Disclosures</p>	<p>This information must appear in the catalog.</p> <p>(b) In addition to the statement described under subdivision (a) of this section, a qualifying institution shall include the following statement on its current schedule of student charges: "The State of California created the Student Tuition Recovery Fund (STRF) to relieve or mitigate economic losses suffered by students in educational programs who are California residents, or are enrolled in a residency programs attending certain schools regulated by the Bureau for Private Postsecondary and Vocational Education. You may be eligible for STRF if you are a California resident or are enrolled in a residency program, prepaid tuition, paid the STRF assessment, and suffered an economic loss as a result of any of the following: 1. The school closed before the course of instruction was completed. 2. The school's failure to pay refunds or charges on behalf of a student to a third party for license fees or any other purpose, or to provide equipment or materials for which a charge was collected within 180 days before the closure of the school. 3. The school's failure to pay or reimburse loan proceeds under a</p>

Notice to Comply – CA 38031/21 0614

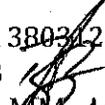
Inspector's Initial: BJB

Administrator's Initial: 

	<p>federally guaranteed student loan program as required by law or to pay or reimburse proceeds received by the school prior to closure in excess of tuition and other costs.</p> <p>4. There was a material failure to comply with the Act or this Division within 30 days before the school closed or, if the material failure began earlier than 30 days prior to closure, the period determined by the Bureau.</p> <p>5. An inability after diligent efforts to prosecute, prove, and collect on a judgment against the institution for a violation of the Act." However, no claim can be paid to any student without a social security number or a taxpayer identification number.</p> <p>Note: Authority cited: Sections 94803, 94877 and 94923, Education Code. Reference: Section 94923, Education Code.</p> <p>This information must appear in the catalog.</p>
<p>74190: Agents for Service of Process</p>	<p>The agent shall be at an <u>address other than the address of the institution</u> or any branch.</p> <p>As currently listed, the Agent for Service of Process is at the same address as the institution.</p>

Inspector's Name	Brian J Brisco
Inspector's Signature	
Institution Administrator Name/Title:	Morgan Martin, Director of Services (Studies)
Institution Administrator's Signature:	

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

Notice to Comply – CA 3803121 0614
Inspector's Initial: BJB 
Administrator's Initial: MM 

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

IMPORTANT COMPLIANCE NOTICE

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

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

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

DECLARATION

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

Signature

Date

Print Name and Title

THIS DECLARATION OR A NOTICE OF DISAGREEMENT MUST BE SUBMITTED TO THE BUREAU BY **July 10, 2014**

Notice to Comply – CA 3803121 0614

Inspector's Initial: BJB

Administrator's Initial: 