



**NOTICE TO COMPLY**  
CU-1918921 -042025

Institution Name:	International Theological Seminary	Institution Telephone:	(626) 653-9547
Institution Code:	1918921	Administrator Name:	Dr. James S. Lee
Street Address:	540 E. Vine Avenue West Covina, CA 91790	Inspection Date:	April 24, 2025

The Bureau for Private Postsecondary Education (Bureau) issues this Notice to Comply pursuant to California Education Code (CEC) section 94935 and Title 5 of the California Code of Regulations (5 CCR) section 75010.

California Private Postsecondary Education Act: [https://www.bppe.ca.gov/lawsregs/ppe\\_act.pdf](https://www.bppe.ca.gov/lawsregs/ppe_act.pdf)  
Title 5 of the California Code of Regulations: <https://www.bppe.ca.gov/lawsregs/regs.pdf>

Violation	Code Section Violated	Description of the violation and required correction.
1	CEC § 94909 (a)(3)(D)	<p><b>Violation Description:</b> The institution's catalog failed to include the required statement regarding "The Office of Student Assistance and Relief" (OSAR) pursuant to CEC § 94909 (a)(3)(D).</p> <p><b>Correction:</b> The institution shall update the catalog to include the required statement regarding, "The Office of Student Assistance and Relief" (OSAR) pursuant to CEC § 94909 (a)(3)(D) in its entirety. (see below)</p> <p>"The Office of Student Assistance and Relief is available to support prospective students, current students, or past students of private postsecondary educational institutions in making informed decisions, understanding their rights, and navigating available services and relief options. The office may be reached by calling ((888) 370-7589, Option #5, or by visiting, <a href="https://osar.bppe.ca.gov/">www.https://osar.bppe.ca.gov/</a>)."</p>
2	CEC § 94897 (s)	<p><b>Violation Description:</b> The institution's catalog contains on multiple pages language that violates Section 1788.93 of the Civil Code, pursuant to CEC § 94897 (s).</p>

Violation	Code Section Violated	Description of the violation and required correction.
		<p><b>Correction:</b> The institution shall update the catalog by removing any reference that violates Civil Code 1788.93, pursuant to CEC § 94897 (s). The following sentences contain verbiage that is non-compliant. Any reference to withholding transcripts shall be removed.</p> <p><b>Page 37</b> REQUEST FOR TRANSCRIPTS AND DIPLOMAS “Diploma and final transcripts will not be released until a student has met all financial obligations. However, students who received grants, or the Mission Partnership Scholarship will receive their diploma and transcript when they graduate and have returned home and served for at least three years.”</p> <p><b>Page 38</b> “Diplomas and final transcripts will not be released until students meet all seminary financial obligations.”</p> <p><b>Page 88</b> “I understand that I will receive official transcripts and/or a degree only if I have met all the required academic standards and requirements and have paid my financial obligations to ITS in full.”</p> <p>“For F-1 students: I understand that I will receive official transcripts only if I have fulfilled my Pledge to Return.”</p>

Violation	Code Section Violated	Description of the violation and required correction.
3	CEC § 94909 (a)(2) in conjunction with CEC § 94897 (l)(1)(2)	<p><b>Violation Description:</b> The institution's catalog failed to include the required statement regarding approval to operate and its meaning, pursuant to CEC § 94909 (a)(2) in conjunction with CEC § 94897 (l)(1)(2).</p> <p><b>Correction:</b> The institution shall add the required statement regarding approval to operate and its meaning to the catalog, pursuant to CEC § 94909 (a)(2) in conjunction with CEC § 94897 (l)(1)(2).</p> <p><i>Example: This institution is a private institution approved to operate by the California Bureau for Private Postsecondary Education. Approval to operate means the institution is compliant with the minimum standards contained in the California Private Postsecondary Education Act of 2009 (as amended) and Division 7.5 of Title 5 of the California Code of Regulations.</i></p>
4	CEC §94909 (a)(8)(B) In conjunction with CEC § 94919 (d) CEC § 94920 (b)	<p><b>Violation Description:</b> The institution's catalog failed to include a refund policy for students who cancel within the cancellation period (seven days after enrollment or thru the first-class session), pursuant to CEC §94909 (a)(8)(B) in conjunction with CEC § 94919 (d), or CEC § 94920 (b) as applicable.</p> <p><b>Correction:</b> The institution shall update the catalog to include the refund policy for students who cancel during the cancellation period, pursuant to CEC §94909 (a)(8)(B) in conjunction with CEC § 94919 (d) or CEC § 94920 (b), as applicable.</p>
5	5 CCR § 74112 (d)(3)	<p><b>Violation Description:</b> The institution's catalog failed to include the SOC codes, (United States Department of Labor's Standard Occupational Classification codes, at the Detailed Occupation (six-digit) level.) to report gainful employment, pursuant to (5, CCR §74112 (d)(3)).</p> <p><b>Correction:</b> The institution shall update the catalog with the appropriate SOC codes, pursuant to 5 CCR § 74112 (d)(3).</p>

Violation	Code Section Violated	Description of the violation and required correction.
6	5 CCR § 71810 (b)(3)	<p><b>Violation Description:</b> The institution's catalog failed to specify whether visa services are provided or whether the institution will vouch for student status, and any associated charges, pursuant to 5CCR § 71810 (b)(3).</p> <p><b>Correction:</b> The institution shall update the catalog and include a statement specifying whether visa services are provided, or whether the institution will vouch for student status, and any associated charges, pursuant to 5CCR § 71810 (b)(3).</p>
7	5 CCR § 76215 (a)	<p><b>Violation Description:</b> The institution's catalog failed to include the STRF disclosure, pursuant to 5CCR § 76215 (a).</p> <p><b>Correction:</b> The institution shall update the catalog to include the STRF disclosure, pursuant to 5CCR § 76215 (a).</p>
8	5 CCR § 71810 (b)(13)(A)(B)(C)	<p><b>Violation Description:</b> The institution's catalog failed to include the required housing information, pursuant to 5CCR § 71810 (b)(13)(A)(B)(C).</p> <p><b>Correction:</b> The institution shall update the catalog to include the required housing information, pursuant to 5CCR § 71810 (b)(13)(A)(B)(C).</p>
9	5 CCR § 71810 (b)(11)	<p><b>Violation Description:</b> The institution's catalog failed to include the approximate number of days that will elapse between the institution's receipt of student lessons, projects, or dissertations and the institution's response or evaluation, pursuant to 5 CCR § 71810 (b)(11).</p> <p><b>Correction:</b> The institution shall update the catalog to include the approximate number of days that will elapse between the institution's receipt of student lessons, projects, or dissertations and the institution's response or evaluation, pursuant to 5 CCR § 71810 (b)(11).</p>

Violation	Code Section Violated	Description of the violation and required correction.
10	CEC § 94909 (a) (10)	<p><b>Violation Description:</b> The institution's catalog failed to include 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 federal and state financial aid programs, pursuant to CEC § 94909 (a) (10).</p> <p><b>Correction:</b> The institution shall update the catalog to include 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 federal and state financial aid programs, pursuant to CEC § 94909 (a) (10).</p>
11	5 CCR §71810 (b)(4)	<p><b>Violation Description:</b> The institution's catalog failed to include a statement indicating whether English language services, including instruction such as ESL, are provided and, if so, the nature of the service and its cost, pursuant to 5 CCR §71810 (b)(4).</p> <p><b>Correction:</b> The institution shall update the catalog to include a statement indicating whether English language services, including instruction such as ESL, are provided and, if so, the nature of the service and its cost, pursuant to 5 CCR §71810 (b)(4).</p>
12	5 CCR §71810 (b)(5)	<p><b>Violation Description:</b> The institution's catalog failed to include a statement indicating whether any instruction will occur in a language other than English and, if so, the level of proficiency required and the kind of documentation of proficiency accepted, pursuant to 5 CCR §71810 (b)(5).</p> <p><b>Correction:</b> The institution shall update the catalog to include a statement indicating whether any instruction will occur in a language other than English and, if so, the level of proficiency required and the kind of documentation of proficiency accepted, pursuant to 5 CCR §71810 (b)(5).</p>

Violation	Code Section Violated	Description of the violation and required correction.
13	5 CCR § 76215 (a)	<p><b>Violation Description:</b> The institution's enrollment agreement failed to include the required STRF disclosure, pursuant to 5 CCR § 76215 (a).</p> <p><b>Correction:</b> The institution shall update the enrollment agreement to include the required STRF disclosure, pursuant to 5 CCR § 76215 (a).</p>
14	5 CCR § 76215 (b)	<p><b>Violation Description:</b> The institution's enrollment agreement failed to include the most recent version of the STRF disclosure, pursuant to 5 CCR § 76215 (b). The disclosure does not include the most recent address and phone number for the bureau)</p> <p><b>Correction:</b> The institution shall update the enrollment agreement to include the most recent version of the STRF disclosure, pursuant to 5 CCR § 76215 (b), or they shall remove it because 5 CCR § 76215 (b) is not required to be in the enrollment agreement. (only 5 CCR § 76215 (a) is required to be in the enrollment agreement)</p>
15	5 CCR § 71800 (b)	<p><b>Violation Description:</b> The institution's enrollment agreement failed to include the dates of the period covered by the enrollment agreement, pursuant to 5 CCR § 71800 (b).</p> <p><b>Correction:</b> The institution shall update the enrollment agreement to include the dates of the period covered by the enrollment agreement, pursuant to 5 CCR § 71800 (b).</p>
16	5 CCR § 71800 (d)	<p><b>Violation Description:</b> The institution's enrollment agreement failed to include the date by which the student must exercise his or her right cancel or withdraw, pursuant to 5 CCR § 71800 (d).</p> <p><b>Correction:</b> The institution shall update the enrollment agreement to include the date the student must withdraw or exercise his or her right cancel or withdraw, pursuant to 5 CCR § 71800 (d).</p>


Violation	Code Section Violated	Description of the violation and required correction.
17	CEC § 94897 (s)	<p><b>Violation Description:</b> The institution's Enrollment agreement contains language that violates Section 1788.93 of the Civil Code, pursuant to CEC § 94897 (s).</p> <p><b>Correction:</b> The institution shall update the enrollment agreement by removing any reference that violates Civil Code 1788.93, pursuant to CEC § 94897 (s). The following sentences contain verbiage that is non-compliant. Any reference to withholding transcripts shall be removed:</p> <p>Page 8 "I understand that I will receive official transcripts and/or a degree, only if I have met all the required academic standards and requirements and have paid my financial obligations to ITS in full."</p> <p>Page 8 "For F-1 students: I understand that I will receive official transcripts only if I have fulfilled my Pledge to Return."</p>
18	CEC §94909 (a)(8)(B) In conjunction with CEC § 94919 (d) CEC § 94920 (b)	<p><b>Violation Description:</b> The institution's enrollment agreement failed to include a refund policy for students who cancel within the cancellation period (seven days after enrollment or thru the first-class session), pursuant to CEC §94909 (a)(8)(B) in conjunction with CEC § 94919 (d), or CEC § 94920 (b), as applicable.</p> <p><b>Correction:</b> The institution shall update the enrollment agreement to include the refund policy for students who cancel during the cancellation period, pursuant to CEC §94909 (a)(8)(B) in conjunction with CEC § 94919 (d) or CEC § 94920 (b), as applicable.</p>

Pursuant to 5 CCR section 75010(d), the Institution may do either of the following:

- (1) Within 30 days from the date of the inspection, sign and return the notice to comply, declaring under penalty of perjury that the violation was corrected and describing how compliance was achieved; or
- (2) Within 30 days from the date of the inspection, file with the Bureau a written notice of disagreement, specifying the minor violations described in the notice to comply with which the person approved to operate the institution disagrees, 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.

**Pursuant to CEC section 94935(h), failure to comply with the notice to comply will result in the Bureau taking appropriate administrative enforcement action.**

The Notice to Comply was given to the Institution's owner, person in control, chief academic officer, chief executive officer, chief operating officer, institution director, or any person delegated by any of the aforementioned persons to facilitate the inspection or accept such notice as set forth below.

Notice To Comply Given To Name & Title:	Dr. James S. Lee
Bureau Compliance Analyst Name:	Laura Cheah
Bureau Compliance Analyst Signature:	



**NOTICE TO COMPLY DECLARATION**  
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I declare under penalty of perjury that each violation identified in this Notice to Comply has been corrected and attached with this declaration is evidence to support the correction of each violation identified.

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Signature

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Date

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Print Name and Title