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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. BPPE25-0321

13 **THE PROVIDENCE COLLEGE**

STATEMENT OF ISSUES

14 **Application for Renewal of Approval to**
15 **Operate and Offer Educational Programs**
16 **for Non-Accredited Institutions**

Institution Code Number 3007651

17 Respondent.

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20 **PARTIES**

21 1. Deborah Cochrane (Complainant) brings this Statement of Issues solely in her official
22 capacity as the Chief of the Bureau for Private Postsecondary Education, Department of
23 Consumer Affairs.

24 2. On or about December 7, 2022, the Bureau for Private Postsecondary Education
25 (Bureau) received an application for Renewal of Approval to Operate and Offer Educational
26 Programs for Non-Accredited Institutions from The Providence College (Respondent), owned by
27 The Providence College (Aboli N'dri, CEO/CFO/COO/CAD). On or about October 31, 2022,
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Aboli N'dri certified under penalty of perjury to the truthfulness of all statements, answers, and representations in the application. The Bureau denied the application on February 26, 2025.

JURISDICTION

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

4. Education Code (Code) section 94886 states:

Except as exempted in Article 4 (commencing with Section 94874) or in compliance with the transition provisions in Article 2 (commencing with Section 94802), 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.

5. Code section 94887 states:

An approval to operate shall be granted only after an applicant has presented sufficient evidence to the bureau, and the bureau has independently verified the information provided by the applicant through site visits or other methods deemed appropriate by the bureau, that the applicant has the capacity to satisfy the minimum operating standards. The bureau shall deny an application for an approval to operate if the application does not satisfy those standards.

STATUTORY PROVISIONS

6. Education Code Section 94891 provides, in pertinent part:

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

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

7. Education Code Section 94900.5 provides:

An institution shall maintain, for a period of not less than five years, at its principal place of business in this state, complete and accurate records of all of the following information:

(a) The educational programs offered by the institution and the curriculum for each.

(b) The names and addresses of the members of the institution's faculty and records of the educational qualifications of each member of the faculty.

(c) Any other records required to be maintained by this chapter, including, but not limited to, records maintained pursuant to Article 16 (commencing with Section 94928).

REGULATORY PROVISIONS

8. California Code of Regulations, title 5, section 71700 provides:

The Bureau may request that an institution document compliance with the standards set forth in the Act and this Division to obtain and maintain an approval to operate.

9. California Code of Regulations, title 5, section 71710 provides, in pertinent part:

(a) In order to meet its mission and objectives, the educational program defined in Section 94837 of the Code shall be comprised of a curriculum that includes:

(1) Those subject areas that are necessary for a student to achieve the educational objectives of the educational program in which the student is enrolled;

(2) Subject areas and courses or modules that are presented in a logically organized manner or sequence to students;

(3) Course or module materials that are designed or organized by duly qualified faculty. For each course or module, each student shall be provided with a syllabus or course outline that contains:

(A) A short, descriptive title of the educational program;

(B) A statement of educational objectives;

(C) Length of the educational program;

(D) Sequence and frequency of lessons or class sessions;

(E) Complete citations of textbooks and other required written materials;

(F) Sequential and detailed outline of subject matter to be addressed or a list of skills to be learned and how those skills are to be measured;

(G) Instructional mode or methods.

(4) If degree granting, require research of an appropriate degree that utilizes a library and other learning resources;

(5) Specific learning outcomes tied to the sequence of the presentation of the material to measure the students' learning of the material; and

(6) Evaluation by duly qualified faculty of those learning outcomes.

10. California Code of Regulations, title 5, section 71715 provides, in pertinent part:

...

(b) The institution shall document that the instruction offered leads to the achievement of the learning objectives of each course.

...

11. California Code of Regulations, title 5, section 71720 provides, in pertinent part:

(b) Instructors in an Educational Program Not Leading to a Degree.

(1) An institution shall employ instructors who possess the academic, experiential and professional qualifications to teach, including a minimum of three years of experience, education and training in current practices of the subject area they are teaching. If an instructor does not possess the required three years of experience, education and training in the subject area they are teaching, the institution shall document the qualifications the instructor possesses that are equivalent to the minimum qualifications.

12. California Code of Regulations, title 5, section 71730 provides, in pertinent part:

...

(f) The institution shall employ administrative personnel who have the expertise to ensure the achievement of the institution's mission and objectives and the operation of the educational programs.

13. California Code of Regulations, title 5, section 71475 provides, in pertinent part:

(t) In addition, the institution shall list in the application, the following for each educational program offered unless there have been no substantive changes since the last submission. If there have been no substantive changes made the institution may so state and is not required to provide documentation.

...

(4) The title of the educational programs and other components of instruction offered, including a description of the courses (e.g., below college level, undergraduate level, graduate level)

...

(x) The application shall include a statement that the institution has contracted with sufficient duly qualified faculty members who meet the qualifications of section 71720 unless there have been no substantive changes since the last submission. If there have been no substantive changes made the institution may so state and is not required to provide documentation.

FACTUAL ALLEGATIONS

First Deficiency Letter

14. On or about December 7, 2022, the Bureau receive an application for a Renewal of Approval to Operate an Institution Non-Accredited ("Application"). The Bureau issued a Deficiency Letter to Respondent on January 17, 2023, identifying deficiencies in the following sections of the application: Institution, Form of Business Organization, Owners, Institution Representative, Exemplars of Student Agreements, Financial Resources and Statements, Catalog,

1 Graduation or Completion Documents, School Performance Fact Sheets, Institution Contact
2 Person, Agent for Service of Process within California, Advertising and Other Public Statements,
3 Instructions in Languages other than English, Job Placement Assistance, Record Keeping,
4 Custodian of Records, Declaration under Penalty of Perjury, and STRF Fee.

5 15. On or about February 10, 2023, the Bureau's Licensing Unit received a letter and
6 documents submitted to address the deficiencies with its application.

7 Second Deficiency Letter

8 16. On or about March 6, 2023, the Bureau's Licensing Unit sent a letter identifying
9 deficiencies in the following sections of the application: Institution, Form of Business
10 Organization, Owners, Institution Representative, Exemplars of Student Agreements, Financial
11 Resources and Statements, Catalog, Graduation or Completion Documents, School Performance
12 Fact Sheets, Record Keeping, Custodian of Records, and STRF Fee.

13 17. On or about April 20, 2023, the Bureau's Licensing Unit received a letter and
14 documents submitted to address the deficiencies with its application.

15 Third Deficiency Letter

16 18. On or about May 8, 2023, the Bureau's Licensing Unit sent a letter identifying
17 deficiencies in the following sections of the application: Institution, Form of Business
18 Organization, Owners, Exemplars of Student Agreements, Financial Resources and Statements,
19 Catalog, Graduation or Completion Documents, Record Keeping/Custodian of Records, School
20 Performance Fact Sheets, and STRF Fee.

21 19. On or about June 14, 2023, the Bureau's Licensing Unit received a letter and
22 documents submitted to address the deficiencies with its application.

23 Fourth Deficiency Letter

24 20. On or about July 10, 2023, the Bureau's Licensing Unit sent a letter identifying
25 deficiencies in the following sections of the application: Owners, Exemplars of Student
26 Agreements, Financial Resources and Statements, Catalog, Graduation or Completion
27 Documents, Record Keeping/Custodian of Records, School Performance Fact Sheets, and STRF
28 Fee.

21. Between August 11, 2023 and October 17, 2023, the Bureau's Licensing Unit received letters and documents submitted to address the deficiencies with its application.

QEU Deficiency Letter

22. On or about December 13, 2024, the Bureau's Quality of Education Unit (QEU) sent a letter identifying deficiencies in the following sections of the application: Institution Contact Person, Form of Business Organization, Agent for Service of Process within California, Organization and Management, Advertising and Other Public Statements, Instruction and Degrees Offered, Description of Educational Program, Faculty, and Catalog.

23. On or about January 21, 2025, the Bureau's QEU Unit received a letter and documents submitted to address the deficiencies with its application.

Notice of Denial of Application

24. On or about February 26, 2025, the Bureau mailed a Notice of Denial of Application for Renewal of Approval to Operate an Institution Non-Accredited to Respondent.

25. On or about April 15, 2025, the Bureau received an appeal of the denial of Application for Renewal of Approval to Operate an Institution Non-Accredited.

26. On or about June 30, 2025, the Bureau received a mitigation packet submitted to address the deficiencies with its application.

27. On or about July 17, 2025, the Bureau emailed Respondent acknowledging receipt of its June 30, 2025 Mitigation Packet, and notifying Respondent of the following remaining deficiencies: (1) Respondent did not identify or quantify the number of hours students are expected to devote outside of the institution to prepare for planned learning experiences, preventing the Bureau from verifying that total hours are sufficient for awarding semester credit, in violation of Cal. Code Regs., tit. 5, § 71475(t)(4); (2) Respondent did not identify a qualified individual to create or revise the curriculum for the approved MicroComputer Office Specialist program, violating § 71710(a)(3); (3) the syllabus provided for Computerized Medical Billing II was incomplete and not clearly labeled for review, and appears to count homework assignments as instructional hours, violating §§ 71710(a)(3)(A), (C), and (D); (4) the syllabus for the MicroComputer Office Specialist program contains conflicting information regarding course

length and class meeting times, violating §§ 71710(a)(3)(C) and (D); (5) respondent did not specify how faculty evaluate student learning or what assessments are used to document learning outcomes, violating §§ 71710(a)(5) and (6) and 71715(b); and, (6) respondent failed to identify or contract with duly qualified faculty to teach in the MicroComputer Office Specialist program, violating §§ 71475(x), 71700, and 71720(b).

FIRST CAUSE FOR DENIAL OF APPLICATION

(Failure to Provide or Demonstrate Educational Program that Meets Minimum Operational Standards)

28. Respondent's application is subject to denial under Education Code sections 94887 and 94891, in conjunction with California Code of Regulations, title 5, section 71475, subdivision (t)(4), in that Respondent failed to identify or quantify the number of hours students are expected to devote outside of the institution to prepare for planned learning experiences, preventing the Bureau from verifying that total hours are sufficient for awarding semester credit. Additionally, Complainant refers to, and by this reference incorporates, the allegations set forth in above paragraphs 14 through 26, as though set forth in full herein.

SECOND CAUSE FOR DENIAL OF APPLICATION

(Failure to Provide or Demonstrate Faculty that Meets Minimum Operational Standards)

29. Respondent's application is subject to denial under Education Code sections 94887 and 94891, in conjunction with California Code of Regulations, title 5, section 71710, subdivision (a)(3), in that Respondent failed to identify duly qualified faculty to create or revise the curriculum for the approved MicroComputer Office Specialist program. Additionally, Complainant refers to, and by this reference incorporates, the allegations set forth in above paragraphs 14 through 26, as though set forth in full herein.

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1 evaluate student learning and what assessments are used to document learning outcomes.
2 Additionally, Respondent failed to identify or contract with duly qualified faculty to instruct the
3 MicroComputer Office Specialist program. Complainant refers to, and by this reference
4 incorporates, the allegations set forth in above paragraphs 14 through 26, as though set forth in
5 full herein.

6 **SIXTH CAUSE FOR DENIAL OF APPLICATION**

7 **(Failure to Provide or Demonstrate Faculty that Meets Minimum**
8 **Operational Standards)**

9 33. Respondent's application is subject to denial under Education Code sections 94887
10 and 94891, in conjunction with California Code of Regulations, title 5, section 71710, subdivision
11 (a)(3), in that Respondent failed to identify or contract with a duly qualified faculty to teach in the
12 MicroComputer Office specialist program. Additionally, Complainant refers to, and by this
13 reference incorporates, the allegations set forth in above paragraphs 14 through 26, as though set
14 forth in full herein.

15 **PRAYER**

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

19 1. Denying the application of The Providence College, owned by The Providence
20 College with Aboli N'dri as CEO/CFO/COO/CAD, for a Renewal of Approval to Operate and
21 Offer Educational Programs for Non-Accredited Institutions; and,

22 2. Taking such other and further action as deemed necessary and proper.

23
24 DATED: 11/6/2025

"Original signature on file"

25 DEBORAH COCHRANE
26 Chief
27 Bureau for Private Postsecondary
28 Education
Department of Consumer Affairs
State of California
Complainant

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