



**Bureau for Private Postsecondary Education**  
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**CITATION: ASSESSMENT OF FINE AND ORDER OF ABATEMENT**

To: Intrax English Academies, LLC dba Stafford House International, Owner  
Intrax English Academies, LLC dba Stafford House International  
417 Montgomery Street, 3rd Floor  
San Francisco, CA 94104

**INSTITUTION CODE: 90323996**  
**CITATION NUMBER: 2021141**  
**CITATION ISSUANCE/SERVICE DATE: November 5, 2020**  
**DUE DATE: December 4, 2020**  
**FINE AMOUNT: \$ 7,000.00**  
**ORDER OF ABATEMENT INCLUDED: Yes**

Christina Villanueva issues this Citation: Assessment of Fine and Order of Abatement (Citation) in her official capacity as Discipline Manager of the Bureau for Private Postsecondary Education (Bureau) of the California Department of Consumer Affairs.

CITATION

A Citation is hereby issued to Intrax English Academies, LLC dba Stafford House International, Owner of Intrax English Academies, LLC dba Stafford House International (Institution) located at 417 Montgomery Street, 3rd Floor, San Francisco, CA 94104, pursuant to Business and Professions Code section 125.9; California Education Code (CEC) sections 94936 and 94932; and Title 5 of the California Code of Regulations (5, CCR) section 75020 for the violations described below.

BACKGROUND

On June 20, 2019, Bureau staff conducted an unannounced Compliance inspection at the Institution. During the inspection Bureau staff reviewed student files and found material violations related to verification of high school completion or its equivalent, and/or ability to benefit (ATB) exam results, the 2017-2018 School Performance Fact Sheet (SPFS), the supporting documentation to substantiate the data reported on the 2017-2018 SPFS, as well as violations with the supporting documentation to substantiate the data reported on the School Tuition Recovery Fund (STRF) Assessment Reporting Form for the first quarter of 2019.

VIOLATION(S)

#	Below you will find the California Education Code (CEC) and/or Title 5 of the California Code of Regulations (5, CCR code) section(s) of law you are charged with violating.
1.	<b>Violation:</b> <b>5, CCR Section 71770 (a)(1) – Admissions Standards and Transferred Credits Policy</b> <i>“(a) The institution shall establish specific written standards for student admissions for each educational program. These standards shall be related to the particular educational program. An</i>

*institution shall not admit any student who is obviously unqualified or who does not appear to have a reasonable prospect of completing the program. In addition to any specific standards for an educational program, the admissions standards must specify as applicable that:*

*(1) Each student admitted to an undergraduate degree program, or a diploma program, shall possess a high school diploma or its equivalent, or otherwise successfully take and pass the relevant examination as required by section 94904 of the Code."*

**5, CCR Section 71920 (a)(1)(A) – Student Records**

*"(a) The institution shall maintain a file for each student who enrolls in the institution whether or not the student completes the educational service.*

*(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:*

*(1) Written records and transcripts of any formal education or training, testing, or experience that are relevant to the student's qualifications for admission to the institution or the institution's award of credit or acceptance of transfer credits including the following:*

*(A) Verification of high school completion or equivalency or other documentation establishing the student's ability to do college level work, such as successful completion of an ability-to-benefit test;"*

**5, CCR Section 71930(e) – Maintenance of Records**

*"(e) All records that the institution is required to maintain by the Act or this chapter shall be made immediately available by the institution for inspection and copying during normal business hours by the Bureau and any entity authorized to conduct investigations."*

**CEC Section 94904 (a)(b) – Ability to Benefit Students**

*"(a) Except as provided in subdivision (c), before an ability-to-benefit student may execute an enrollment agreement, the institution shall have the student take an independently administered examination from the list of examinations prescribed by the United States Department of Education pursuant to Section 484(d) of the federal Higher Education Act of 1965 (20 U.S.C. Sec. 1070a et seq.). The student shall not enroll unless the student achieves a score, as specified by the United States Department of Education, demonstrating that the student may benefit from the education and training being offered.*

*(b) If the United States Department of Education does not have a list of relevant examinations that pertain to the intended occupational training, the bureau may publish its own list of acceptable examinations and required passing scores."*

**Bureau staff reviewed student files and found that they failed to contain verification of high school completion or its equivalent, and/or successful completion of an approved ATB. Bureau staff asked Institution staff why the student files did not contain the required documentation and Institution staff stated that they were not required to verify this information.**

**Order of Abatement:**

The Bureau orders the Institution to submit a policy, or procedure, of how the Institution will maintain future compliance with 5, CCR sections 71770(a)(1), 71920(a)(b)(1)(a), 71930(e), and CEC section 94904(a)(b). In addition, if the Institution wishes to offer an ATB exam to incoming student's, the Bureau orders the Institution to submit the name of the ATB exam they would like to administer for Bureau approval.

**Assessment of Fine**

The fine for this violation is \$1,500.00

2.

**Violation:**

**5, CCR Section 74112 (m)(1)(2)(3)(4)(5)(6)(7)(8)(9) – Uniform Data – Annual Report, Performance Fact Sheet**

*“(m) Documentation supporting all data reported shall be maintained electronically by the institution for at least five years from the last time the data was included in either an Annual Report or a Performance Fact Sheet, and shall be provided to the Bureau upon request; and the data for each program shall include at a minimum:*

*(1) the list of job classifications determined to be considered gainful employment for the educational program;*

*(2) student name(s), address, phone number, email address, program completed, program start date, scheduled completion date, and actual completion dates;*

*(3) graduate’s place of employment and position, date employment began, date employment ended, if applicable, actual salary, hours per week, and the date employment was verified;*

*(4) for each employer from which employment or salary information was obtained, the employer name(s) address and general phone number, the contact person at the employer and the contact’s phone number and email address, and all written communication with employer verifying student’s employment or salary;*

*(5) for students who become self-employed, all documentation necessary to demonstrate self-employment;*

*(6) a description of all attempts to contact each student or employer;*

*(7) any and all documentation used to provide data regarding license examinations and examination results;*

*(8) for each student determined to be unavailable for graduation or unavailable for employment, the identity of the student, the type of unavailability, the dates of unavailability, and the documentation of the unavailability; and*

*(9) the name, email address, phone number, and position or title of the institution’s representative who was primarily responsible for obtaining the students’ completion, placement, licensing, and salary and wage data, the date that the information was gathered, and copies of notes, letters or emails through which the information was requested and gathered.”*

**Bureau staff reviewed the supporting documentation to substantiate the data reported on the 2017-2018 SPFS and found it was missing the following data points:**

- 1. Address**
- 2. Phone Number**
- 3. Actual Completion Dates**
- 4. Graduate’s Place of Employment and Position**
- 5. Date Employment Began**
- 6. Date Employment Ended**
- 7. Actual Salary**
- 8. Hours Per Week**
- 9. The Date Employment was Verified**

**Institution staff stated that the Institution is not a vocational school and does not lead to employment, therefore the Institution felt that they did not have to collect the substantiating data listed above.**

**Order of Abatement:**

The Bureau orders the Institution to submit a policy, or procedure, of how the Institution will

	<p>maintain future compliance with 5, CCR sections 74112 and 71930.</p> <p><b><u>Assessment of Fine</u></b> The fine for this violation is <u>\$5,000.00</u></p>
<p>3.</p>	<p><b><u>Violation:</u></b> <b>5, CCR Section 76140 (a) (1-13)- Record Keeping Requirements</b> <i>“(a) A qualifying institution shall collect and maintain records of student information to substantiate the data reported on the STRF Assessment Reporting Form and records of the students' eligibility under the Fund. Such records shall include the following for each student: (1) Student identification number, (2) First and last names, (3) Email address, (4) Local or mailing address, (5) Address at the time of enrollment, (6) Home address, (7) Date enrollment agreement signed, (8) Courses and course costs, (9) Amount of STRF assessment collected, (10) Quarter in which the STRF assessment was remitted to the Bureau, (11) Third-party payer identifying information, (12) Total institutional charges charged, and (13) Total institutional charges paid.”</i></p> <p>Bureau staff reviewed the supporting documentation to substantiate the data reported on the 1<sup>st</sup> quarter of 2019 STRF Assessment Reporting Form and found it was missing the following data points:</p> <ol style="list-style-type: none"> <li>1. Local or Mailing Address</li> <li>2. Address at the Time of Enrollment</li> <li>3. Home Address</li> <li>4. Courses and Course Costs</li> <li>5. Amount of STRF Assessment Collected</li> <li>6. Quarter in Which the STRF Assessment Was Remitted to the Bureau</li> <li>7. Third-Party Payer Identifying Information</li> <li>8. Total Institutional Charges Charged</li> <li>9. Total Institutional Charges Paid</li> </ol> <p>Institution staff stated that the Institution only submits the data that the students report.</p> <p><b><u>Order of Abatement:</u></b> The Bureau orders the Institution to submit a policy, or procedure, of how the Institution will maintain future compliance with 5, CCR sections 76140 and 71930.</p> <p><b><u>Assessment of Fine</u></b> The fine for this violation is <u>\$500.00</u></p>
<p><b>TOTAL ADMINISTRATIVE FINE DUE: \$7,000.00</b></p>	

### ASSESSMENT OF A FINE

In accordance with CEC section 94936; and 5, CCR sections 75020 and 75030, the Bureau hereby orders this assessment of fine in the amount of **\$7,000.00** for the violations described above. **Payment must be made, to the Bureau, within 30 days from the date of service of the Citation.**

### COMPLIANCE WITH ORDER OF ABATEMENT

In accordance with the provisions of CEC section 94936 and 5, CCR section 75020 the Bureau hereby issues the order(s) of abatement described above. **Evidence of compliance with the order(s) of abatement must be submitted, to the Bureau, within 30 days from the date of service of the Citation.**

### APPEAL OF CITATION

You have the right to contest this Citation through an informal conference with the Bureau; and/or through an administrative hearing in accordance with Chapter 5 (Commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code.

If you wish to contest this Citation, you must submit the 'Notice of Appeal of Citation – Request for Informal Conference and/or Administrative Hearing' form (enclosed) within 30 days from the date of service of the Citation. *If you do not request an informal conference and/or an administrative hearing within 30 days from the service of the Citation, you will not be able to request one at a later time.*

Unless a written request for an informal conference and/or an administrative hearing is signed by you and delivered to the Bureau by **December 4, 2020**, you will be deemed to have waived or forfeited your right to appeal this matter.

### EFFECTIVE DATE OF CITATION

If you do not request an informal conference and/or an administrative hearing, this Citation shall become effective on **November 5, 2020**. Payment of the administrative fine and evidence of compliance with the order(s) of abatement shall be due by **December 4, 2020**. Your payment of the administrative fine shall not constitute an admission of the violation(s) charged.

If a hearing is requested, you will not be required to comply with this Citation until 30 days after a final order is entered against you.

**Payment of the administrative fine and/or written request for appeal must be mailed to:**

Gabriella Perez, Discipline Citation Program  
Bureau for Private Postsecondary Education  
1747 N. Market Blvd., Suite 225  
Sacramento, CA 95834

Failure for an applicant or institution to abate the violation(s) listed above or to pay the administrative fine within the time allowed may result in denial of an application for an approval or renewal to operate; disciplinary action, and/or collection action. The Bureau will promptly take all appropriate action to enforce this Citation and recover the civil penalties prescribed therein or found to be due after a hearing.

CONTACT INFORMATION

If you have any questions regarding this Citation, or desire further information, please contact Gabriella Perez, Citation Analyst, at (916) 574-8969 Gabriella.Perez@dca.ca.gov.

“Original signature on file”

“11/5/2020”

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**Christina Villanueva**  
**Discipline Manager**

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**Date**

Enclosures

- Applicable Laws Violated
- Statement of Rights: Appeal Process Information Sheet
- Notice of Appeal of Citation: Request for Informal Conference and/or Administrative Hearing
- Payment of Fine – Waiver of Appeal
- Declaration of Service by Certified and First- Class Mail