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

11  
12 In the Matter of the Statement of Issues  
Against:

Case No. 999294

13 **CENTAUR UNIVERSITY;**  
14 **MICKEY KAY TROXELL, Owner**  
15  
16 Respondent.

**STATEMENT OF ISSUES**

17 Complainant alleges:

18 **PARTIES**

- 19 1. Joanne Wenzel (Complainant) brings this Statement of Issues solely in her official  
20 capacity as the Chief of the Bureau for Private Postsecondary Education, Department of  
21 Consumer Affairs.  
22 2. On or about August 4, 2010, the Bureau for Private Postsecondary Education received  
23 an application for an approval to operate from Centaur University, a non-accredited institution,  
24 from institution representative Rick E. Thomas and owner Mickey Kay Troxell (Respondent). On  
25 or about July 28, 2010, Rick E. Thomas and Mickey Kay Troxell certified under penalty of  
26 perjury to the truthfulness of all statements, answers, and representations in the application. The  
27 Bureau denied the application on October 7, 2013.

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1 **JURISDICTION**

2 3. This Statement of Issues is brought before the Director of the Department of  
3 Consumer Affairs (Director) for the Bureau for Private Postsecondary Education, under the  
4 authority of the following laws.

5 4. The former Bureau for Private Postsecondary and Vocational Education sunsetted on  
6 July 1, 2007. On October 11, 2009, the California Private Postsecondary Education Act of 2009  
7 (SB 48 and hereinafter, "the Act") was signed into law. The Act, which became operative on  
8 January 1, 2010, established the Bureau for Private Postsecondary Education (hereinafter  
9 "Bureau").

10 5. Education Code Section 94886 states:

11 Except as exempted in Article 4 (commencing with section 94874) or in  
12 compliance with the transition provisions in Article 2 (commencing with  
13 Section 94802), a person shall not open, conduct, or do business as a private  
14 postsecondary educational institution in this state without obtaining an approval  
15 to operate under this chapter.

16 6. Education Code Section 94887 states:

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

23 7. Title 5, California Code of Regulations (hereinafter "CCR"), section 71400.5 states:

24 (a) The inclusion of false or misleading information, or the intentional or  
25 negligent omission of pertinent information on any application may result in the  
26 denial of the application or a delay in processing, and may be grounds for  
27 action pursuant to Article 18 of the Act.

28 (b) In addition to denying an application pursuant to section 94887 of the Code,  
the Bureau may deny any application based on any act that constitutes grounds  
for the denial of a license under Section 480 of the Business and Professions  
Code, incorporated herein by reference.

(c) The proceedings under this section shall be conducted in accordance with  
Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2  
of the Government Code.

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

- 4 (1) a short, descriptive title of the educational program;
- 5 (2) a statement of educational objectives;
- 6 (3) length of the educational program;
- 7 (4) sequence and frequency of lessons or class sessions;
- 8 (5) complete citations of textbooks and other required written materials;
- 9 (6) sequential and detailed outline of subject matter to be addressed or a list  
10 of skills to be learned and how those skills are to be measured;
- 11 (7) instructional mode or methods.

12 . . . .

13 (e) specific learning outcomes tied to the sequence of the presentation of  
14 the material to measure the students' learning of the material; and

15 (f) evaluation by duly qualified faculty of those learning outcomes.

16 13. Title 5, CCR, section 71715 states:

17 . . . .

18 (d) Distance education as defined in section 94834 of the Code, does not  
19 require the physical presence of students and faculty at the same location but  
20 provides for interaction between students and faculty by such means as  
21 telecommunication, correspondence, electronic and computer augmented  
22 educational services, postal service, and facsimile transmission. In addition to the  
23 other requirements of this chapter and the Act, an institution offering distance  
24 education shall:

25 (1) ensure that the educational program offered through distance education  
26 is appropriate for delivery through distance education methods;

27 (2) assess each student, prior to admission, in order to determine whether  
28 each student has the skills and competencies to succeed in a distance education  
environment;

(3) ensure that the materials and programs are current, well organized,  
designed by faculty competent in distance education techniques and delivered  
using readily available, reliable technology;

(4) provide for meaningful interaction with faculty who are qualified to  
teach using distance education methods;

(5) maintain clear standards for satisfactory academic progress;

(6) timely complete student evaluations of learning outcomes by duly  
qualified faculty, which are appropriate for use with the distance education  
methods used, and evaluated by duly qualified faculty.

(7) employ a sufficient number of faculty to assure that (A) the institution's  
response to, or evaluation of, each student lesson is returned to the student within  
10 days after the lesson is received by the institution; and (B) the institution's  
response to, or evaluation of, each student project or dissertation is returned to the  
student within the time disclosed in the catalog; and

(8) shall maintain a record of the dates on which lessons, projects, and  
dissertations were received and responses were returned to each student.

1 14. Title 5, CCR, section 71720 states:

2 (a) An Educational Program Leading to a Degree.

3 (1) An institution offering an educational program that leads to a degree  
4 shall employ duly qualified faculty sufficient in number to provide the instruction,  
5 student advisement, and learning outcomes evaluation necessary for the institution  
6 to document its achievement of its stated mission and objectives, and for students  
7 to achieve the specific learning objectives of each course offered;

8 (2) Each institution shall develop and implement written policies and  
9 procedures providing for the participation by duly qualified faculty in the  
10 conducting of research, development of curricula, academic planning, enforcement  
11 of standards of academic quality, pursuit of academic matters related to the  
12 institution's mission and objectives, establishment of criteria for contracting with  
13 new faculty, and evaluation of faculty credentials;

14 (3) In determining the number of faculty sufficient to satisfy subdivision  
15 (a)(1) of this section and to implement the policies established pursuant to  
16 subdivision (a)(2) of this section, the institution shall base its faculty requirements  
17 on all of the following factors:

18 (A) The educational level and number of students;

19 (B) The number of hours needed for direct interaction between students  
20 and faculty per course, quarter, semester, or other term;

21 (C) The number of hours needed to be spent on evaluating written  
22 materials prepared by students, such as distance education, papers, and  
23 examinations, per course, quarter, semester, or other term;

24 (D) The number of group meetings per course, quarter, semester, or other  
25 term;

26 (E) The faculty duties established by the institution as required under  
27 subdivision (a)(2) of this section; and

28 (F) The number of hours per week or units per term considered full-time  
for faculty in the institution.

(4) The faculty shall have sufficient expertise to support the institution's  
awarding of a degree identifying a specialty or major field of emphasis,  
demonstrated by, at a minimum:

(A) That the person possesses one of the following:

1. a degree from: an institution approved by the Bureau or previously  
approved by a predecessor agency of the Bureau; or an accredited institution in the  
United States or Canada; or other state approved institution that documents that the  
institution at which the faculty member earned his or her degree is equivalent to an  
institution that is approved by the Bureau; or an institution outside the United  
States or Canada and in addition provides a comprehensive evaluation of the  
degree performed by a foreign credential evaluation service that is a member of the  
National Association of Credential Evaluation Services (NACES).

2. a credential generally recognized in the field of instruction.

(B) The degree, professional license, or credential possessed by the person  
shall be at least equivalent to the level of instruction being taught or evaluated;

(5) The institution's faculty as a whole shall possess a diverse educational  
background which shall be demonstrated in part by earned degrees from a variety

1 of colleges and universities or by credentials generally recognized in the field of  
2 instruction;

3 (6) When contracting for educational services, the institution shall maintain  
4 control of, and responsibility for, all academic matters, and shall assure that the  
5 instruction and faculty satisfy the standards established by the Act and this  
6 chapter;

7 (7) The institution shall not employ or continue to employ any faculty who  
8 were adjudicated in a judicial or administrative proceeding as having violated any  
9 provision of the Act or this chapter or as having committed any act that would  
10 constitute grounds for the denial of a license under Section 480 of the Business  
11 and Professions Code;

12 (8) Each institution shall have a written Academic Freedom Policy which  
13 describes the latitude the institution allows faculty in the classroom so faculty will  
14 not inadvertently violate the principles of academic freedom. These policies shall  
15 be made available to any person upon request. The institution shall not take  
16 adverse action based on a staff member's exercise of academic freedom consistent  
17 with the institution's policy; and

18 (9) The institution shall maintain records documenting that each faculty  
19 member is duly qualified and was qualified to perform the duties to which the  
20 faculty member was assigned, including providing instruction, evaluating learning  
21 outcomes, evaluating graduate dissertations, theses, and student projects, and  
22 participating on doctoral committees.

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

24 (1) An institution shall employ instructors who possess the academic,  
25 experiential and professional qualifications to teach, including a minimum of three  
26 years of experience, education and training in current practices of the subject area  
27 they are teaching. If an instructor does not possess the required three years of  
28 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.

(2) Each instructor shall maintain their knowledge by completing  
continuing education courses in his or her subject area, classroom management or  
other courses related to teaching.

(3) The institution shall not employ or continue to employ an instructor  
who was adjudicated in a judicial or administrative proceeding as having violated  
any provision of the Act or this chapter, or as having committed any act that would  
constitute grounds for the denial of a license under Section 480 of the Business  
and Professions Code.

15. Title 5, CCR, section 71730 states:

(a) Each institution shall have a chief executive officer, a chief operating  
officer and chief academic officer. One person may serve more than one function.

....

(e) The chief academic officer shall possess a degree or equivalent  
acceptable experience at least equal to the highest qualifications required of the  
institution's faculty. Chief academic officers employed on the date of  
implementation of these regulations, who do not meet the qualifications for their

1 positions, shall have three years to earn the necessary degrees or experience to  
2 qualify them for their position.

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

6 . . . .

7 16. Title 5, CCR, section 71740 states:

8 (a) A degree granting institution shall make available for student use a  
9 library and other learning resources.

10 (b) An institution shall provide or make provisions for the library and other  
11 learning resources needed to support each educational program it offers, including  
12 resources such as reference works, periodicals, monographs, and media and  
13 equipment specific to the educational programs offered.

14 (c) An institution shall describe onsite library and other learning resources,  
15 if any, that enable students to pursue inquiries, searches for information and  
16 documentation, and assignments connected with their study programs.

17 (d) An institution that depends for library and other learning resources  
18 primarily on other institutions' collections and resources not in its possession shall  
19 do all of the following:

20 (1) Describe those library and other learning resources, in the application  
21 and catalog.

22 (2) Provide students and faculty with access to the regular services of a  
23 professional librarian or information specialist experienced in the electronic  
24 retrieval of information, who shall provide support for faculty in curriculum  
25 matters and actively serve as a resource guide for both graduate and undergraduate  
26 students.

27 (3) Assure that students have access to the library collections and resources  
28 of another institution, organization, or library.

(4) Document compliance with paragraphs (1), (2), and (3).

17. Title 5, CCR, section 71770 states:

. . . .

(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.

(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:

(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;

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18. Title 5, CCR, section 71800 states:

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:

- ....
- (e) Itemization of all institutional charges and fees including, as applicable:
- ....
- (11) Student Tuition Recovery Fund fee (non-refundable);
- ....

19. Title 5, CCR, section 71810 states:

(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.

....

20. Title 5, CCR, section 71850 states:

Graduation requirements for an undergraduate degree program shall meet minimum credit requirements and shall include provisions for general education appropriate to the level and type of degree. The institution shall specify the distribution of general education credit requirements by subject area for each undergraduate degree program.

....

(b) An Associate degree may be awarded only to a student whom the institution can document has achieved sequential learning equivalent to that acquired in two years of study beyond high school, as measured by a minimum of 60 semester credits or its equivalent. Except as provided in subdivision (c) of this section, at least 25 percent of the credit requirements for an Associate degree shall be in general education.

....

21. Title 5, CCR, section 71865 states:

(a) A Master's degree may only be awarded to a student who demonstrates at least the achievement of learning in a designated major field that is equivalent in depth to that normally acquired in a minimum of 30 semester credits or its equivalent or one year of study beyond the Bachelor's degree.

....

22. Title 5, CCR, section 76215 states:

- ....
- (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:



1 The State of California created the Student Tuition Recovery Fund (STRF)  
2 to relieve or mitigate economic losses suffered by students in educational  
3 programs who are California residents, or are enrolled in a residency programs  
4 attending certain schools regulated by the Bureau for Private Postsecondary and  
5 Vocational Education.

6 You may be eligible for STRF if you are a California resident or are  
7 enrolled in a residency program, prepaid tuition, paid the STRF assessment, and  
8 suffered an economic loss as a result of any of the following:

- 9 1. The school closed before the course of instruction was completed.
- 10 2. The school's failure to pay refunds or charges on behalf of a student to a  
11 third party for license fees or any other purpose, or to provide equipment or  
12 materials for which a charge was collected within 180 days before the closure of  
13 the school.
- 14 3. The school's failure to pay or reimburse loan proceeds under a federally  
15 guaranteed student loan program as required by law or to pay or reimburse  
16 proceeds received by the school prior to closure in excess of tuition and other  
17 costs.
- 18 4. There was a material failure to comply with the Act or this Division  
19 within 30 days before the school closed or, if the material failure began earlier than  
20 30 days prior to closure, the period determined by the Bureau.
- 21 5. An inability after diligent efforts to prosecute, prove, and collect on a  
22 judgment against the institution for a violation of the Act.

#### 23 **FACTS**

24 23. On August 4, 2010, the Bureau received an Application for Approval to Operate a  
25 Non-accredited Institution (Application # 22607) from Mickey Kay Troxell, owner, of Centaur  
26 University (Respondent).

27 24. On August 1, 2011, the Bureau sent Respondent a letter advising of numerous  
28 deficiencies in the application, including deficiencies in the enrollment agreement and school  
catalog submitted with the application.

29 25. On July 30, 2012, the Bureau received a response to the deficiency letter, which  
30 consisted of a revised application for an approval to operate. Deficiencies remained in the  
31 revised application and the supporting documentation.

32 26. On September 27, 2012, the Bureau sent Respondent a second deficiency letter  
33 citing numerous deficiencies, which still remained in Respondent's application.

34 27. On May 30, 2013, the Bureau received a response to the second deficiency letter,  
35 which consisted of a revised application for an approval to operate. Deficiencies remained in the  
36 revised application and the supporting documentation.

1           28. On October 7, 2013, the Bureau sent Respondent a Notice of Denial of the  
2 application for an approval to operate because of deficiencies in the application and the  
3 documents submitted.

4                                   **FIRST CAUSE FOR DENIAL OF APPLICATION**

5                                   **(Failure to Identify a Qualified Chief Academic Officer)**

6           29. Respondent's application is subject to denial under California Education Code  
7 (hereinafter CEC) section 94887 and title 5, CCR, section 71100 in conjunction with title 5, CCR,  
8 section 71730, subsection (f), in that Respondent's application fails to provide evidence that the  
9 Respondent's designated Chief Academic Officer (CAO) has the necessary experience and  
10 qualifications to meet Respondent's own job description requirements and minimum operating  
11 standards. The circumstances are as follows:

12                   a.     On Respondent's initial application, dated August 4, 2010, the CAO was  
13 identified as Richard Larson. The Bureau questioned Mr. Larson's qualifications in their August  
14 1, 2011 deficiency letter. Respondent replied by redesignating Mickey Kay Troxell ("Troxell") as  
15 the CAO in the July 30, 2012 response to the Bureau's first deficiency letter. The Bureau  
16 requested that Respondent provide transcripts evaluated by the National Association of Credential  
17 Evaluation Services (NACES) for the degrees stated by Troxell in her curriculum vitae (CV).  
18 Respondent did not provide the requested NACES evaluation and then redesignated the CAO  
19 position to yet another individual, Rick E. Thomas ("Thomas"). Respondent provided Thomas'  
20 CV in her May, 30, 2013 response letter, but Thomas' CV did not list him as the newly  
21 designated CAO.

22                   b.     Included in Respondent's July 30, 2012 and May 30, 2013 replies is a job  
23 description for the CAO. The CAO job summary states that "[t]he Chief Academic Officer is  
24 responsible for academic student programs, student progress, retention, and academic student  
25 discipline." Further, listed under "Duties and Responsibilities" of the CAO, within the same  
26 document, are the following job descriptors:

27                   .....



1 a. The initial application by Respondent did not include the name of a curriculum  
2 developer and the Bureau requested the designation of a curriculum developer, as well as his or  
3 her qualifications, in the deficiency letter dated September 27, 2012. On May 30, 2013,  
4 Respondent named Thomas and Michael Pickett ("Pickett") as curriculum developers. Thomas'  
5 CV did not show that he has had any experience in graduate course development or graduate  
6 course lectures.

7 b. Respondent has not provided any documentation of Pickett's qualifications or  
8 experience to be a curriculum developer. Without any record of Pickett's qualifications or  
9 experience, it is impossible to determine if he is "duly qualified" to work as a curriculum  
10 developer.

11 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

12 **(Failure to Provide A Curriculum with Measurable Specific Learning Outcomes )**

13 32. Respondent's application is subject to denial under CEC section 94887 and title 5, CCR,  
14 section 71100 in conjunction with title 5, CCR, section 71710, subsection (e), which requires that  
15 specific learning outcomes be measurable. The circumstances are as follows:

16 a. Title 5, CCR, section 71710, subsections (e), requires that "specific learning  
17 outcomes [be] tied to the sequence of the presentation of the material to measure the students'  
18 learning of the material." Respondent has not provided any information regarding Respondent's  
19 general education courses, as such the Bureau is unable to determine if these courses meet  
20 minimum operating standards and whether students are learning the materials they are taught.

21 **FIFTH CAUSE FOR DENIAL OF APPLICATION**

22 **(Failure to Provide a Valid Platform for Distance Learning)**

23 33. Respondent's application is subject to denial under CEC section 94887 and title 5,  
24 CCR, section 71100 in conjunction with title 5, CCR, section 71715, subsection (d), in that  
25 Respondent has failed to provide a valid platform for their online courses, which are the basis for  
26 their distance education programs. The circumstances are as follows:

27 a. Respondent's application contained an enrollment agreement and a catalog,  
28 both of which stated that distance, as well as on site, learning programs were offered by

1 Respondent. On September 27, 2012, Education Specialist Drew Saeteune sent a letter to  
2 Respondent requesting information on Respondent's online materials in order to conduct an  
3 evaluation of Respondent's Moodle platform. Respondent has since failed to provide sufficient  
4 evidence that Respondent has established a valid platform or provided Mr. Saeteune with the  
5 requested information so that he may conduct a platform evaluation to determine whether  
6 Respondent can properly deliver educational programs via distance education.

7 **SIXTH CAUSE FOR DENIAL OF APPLICATION**

8 **(Minimum Educational Requirements to Award an Undergraduate Degree)**

9 34. Respondent's application is subject to denial under CEC section 94887 and title 5,  
10 CCR, section 71100 in conjunction with title 5, CCR, sections 71850, subsection (d), and 71770,  
11 subsection (b)(1)(A), in that Respondent has not developed its own general education courses,  
12 which must comprise at least 25% of the credit requirements for an associate's degree. The  
13 circumstances are as follows:

14 a. Respondent seeks to award an associate's degree and, therefore, must provide  
15 for general education credit requirements in its curriculum. After initially partnering with the  
16 Saylor Foundation, as a provider of general education credits, Respondent sought to partner with  
17 Straighterline, an online educational company and provider of higher education courses, to  
18 provide its general education courses. Straighterline courses, however, are not approved for  
19 transfer because Straighterline is not an approved or degree granting institution. As a result,  
20 Respondent does not have its own general education courses provided by qualified faculty or  
21 contracted with an approved or degree granting institution to provide the required general  
22 education courses for its associate's degree.

23 **SEVENTH CAUSE FOR DENIAL OF APPLICATION**

24 **(Minimum Educational Requirements to Award a Graduate Degree)**

25 35. Respondent's application is subject to denial under CEC section 94887 and title 5,  
26 CCR, section 71100 in conjunction with title 5, CCR, section 71865, subsection (a), in that  
27 Respondent has not developed a Master's Degree level curriculum in Marriage and Family  
28 Therapy by a qualified curriculum developer such that a student can demonstrate "at least the

1 achievement of learning in a designated major field” upon graduation. The circumstances are as  
2 follows:

3 a. Respondent seeks to award a Master’s Degree in Marriage and Family Therapy  
4 (MFT), as stated in its application to the Bureau and its catalog. In order to do so, Respondent  
5 must have “duly qualified faculty” in order to develop a qualified curriculum, as further alleged in  
6 paragraph 31. Failure to have “duly qualified faculty” on staff necessarily means that  
7 Respondent’s Master’s Program was not developed by qualified curriculum developers and  
8 cannot, therefore, grant a master’s degree “... that is equivalent in depth to that normally acquired  
9 in a minimum of 30 semester credits or its equivalent or one year of study beyond the Bachelor's  
10 degree,” as required by Title 5, CCR, section 71865.

11 **EIGHTH CAUSE FOR DENIAL OF APPLICATION**

12 **(Failure to Contract with Duly Qualified Faculty)**

13 36. Respondent's application is subject to denial under CEC section 94887 and title 5,  
14 CCR, section 71100 in conjunction with title 5, CCR, section 71720, subsection (a)(1), in that  
15 Respondent has failed to contract with duly qualified faculty and do so in sufficient numbers.  
16 The circumstances are as follows:

17 a. Respondent seeks to be a degree granting institution and, specifically, seeks to  
18 grant Associate of Art degrees in Human Services and a Master of Art degree in Psychology. Of  
19 the faculty members, only one possesses a Master’s degree. Another faculty member has degrees  
20 from Rochville University and Lydon University, institutions that are not accredited by any  
21 recognized accreditation bodies in the United States. Of the remaining faculty, one faculty  
22 member possesses a Bachelor’s degree and another an Associate’s degree. The faculty  
23 information provided was insufficient for the Bureau to properly assess the qualifications of the  
24 faculty and also failed to demonstrate that the institution’s faculty for the Doctorate program  
25 possessed a degree that was equivalent to the level of instruction being taught or evaluated.  
26 Respondent has also failed to provide a list of faculty teaching assignments, which would allow  
27 the Bureau to determine if the individual course instructor is qualified to teach the course they  
28 are assigned to teach.

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**NINTH CAUSE FOR DENIAL OF APPLICATION**

**(Providing Access to a Library and Related Resources )**

37. Respondent's application is subject to denial under CEC section 94887 and title 5, CCR, section 71100 in conjunction with title 5, CCR, section 71740 in that Respondent, as a degree granting institution, has not made available for student use a library and other learning resources. The circumstances are as follows:

a. Respondent's catalog states that students will be "required to obtain the use of an academic library in or near your home locale, and you are to complete and return to Centaur University certification that documents such facilities are accessible." Respondent's proposed plan seeks to place the responsibility for obtaining access to a library and resources on the students, as opposed to providing that access as required. Respondent's failure to provide access to a library and related resources does not comply with minimum operating standards.

**TENTH CAUSE FOR DENIAL OF APPLICATION**

**(Catalog Minimum Requirements)**

38. Respondent's application is subject to denial under CEC sections 94887 and 94909, subsection (a)(7), and title 5, CCR, section 71100 in conjunction with title 5, CCR, section 71810, subsection (a), in that Respondent's catalog lists the names of the four faculty members, without disclosing where the faculty obtained their degrees and their field of study, which would inform prospective students of the faculty's qualifications.

**TENTH CAUSE FOR DENIAL OF APPLICATION**

**(Copy of Award Document)**

39. Respondent's application is subject to denial under CEC section 94887 and title 5, CCR, section 71100 in conjunction with title 5, CCR, section 71300 in that Respondent has failed to provide the Bureau with a copy of the graduation document it will award to a graduating student upon completion of its Associate of Arts in Human Services degree.

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**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 Mickey Kay Troxell for an approval to operate Centaur University, a non-accredited institution; and
- 2. Taking such other and further action as deemed necessary and proper.

DATED: September 24, 2014 

JOANNE WENZEL  
Chief  
Bureau for Private Postsecondary Education  
Department of Consumer Affairs  
State of California  
*Complainant*

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