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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:
13
14 **LA UNIVERSITY, INC.**
15 **Application for Approval to Operate an**
Institution Non-Accredited Applicant
16 Respondent.

Case No. 1002040

STATEMENT OF ISSUES

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19 Complainant alleges:

20 **PARTIES**

21 1. Joanne Wenzel (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 June 9, 2015, the Bureau for Private Postsecondary Education (Bureau)
25 received an application for Approval to Operate an Institution Non-Accredited (application
26 number 28381) from LA University, Inc. (Respondent). On or about September 25, 2015, the
27 Bureau issued a deficiency letter to Respondent explaining the deficiencies in its application.
28

1 (1) Whether a graduate of the degree program will be eligible to sit for the
applicable licensure exam in California and other states.

2 (2) A statement that reads: 'A degree program that is unaccredited or a degree
3 from an unaccredited institution is not recognized for some employment positions,
including, but not limited to, positions with the State of California.'

4 (3) That a student enrolled in an unaccredited institution is not eligible for
5 federal financial aid programs.

6 13. Code sections 94909 (a)(1), (a)(4) and (a)(5) state:

7 (a) Except as provided in subdivision (d), prior to enrollment, an institution
8 shall provide a prospective student, either in writing or electronically, with a school
catalog containing, at a minimum, all of the following:

9 (1) The name, address, telephone number, and, if applicable, Internet Web site
10 address of the institution.

11 ...

12 (4) The address or addresses where class sessions will be held.

13 (5) A description of the programs offered and a description of the instruction
14 provided in each of the courses offered by the institution, the requirements for
15 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.

16 14. Code section 94909(a)(8)(A) states:

17 (a) Except as provided in subdivision (d), prior to enrollment, an institution
18 shall provide a prospective student, either in writing or electronically, with a school
catalog containing, at a minimum, all of the following:

19 (8) A detailed description of institutional policies in the following areas:

20 (A) Admissions policies, including the institution's policies regarding the
21 acceptance of credits earned at other institutions or through challenge examinations
and achievement tests, admissions requirements for ability-to-benefit students, and a
22 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
23 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.

24 15. Code section 94909(a)(10) states:

25 (a) Except as provided in subdivision (d), prior to enrollment, an institution
26 shall provide a prospective student, either in writing or electronically, with a school
catalog containing, at a minimum, all of the following:

27 (10) A statement reporting whether the institution participates in federal and
28 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

1 programs.

2 16. Code section 94911(a) states:

3 An enrollment agreement shall include, at a minimum all of the following:

4 (a) The name of the institution and the name of the educational program,
5 including the total number of credit hours, clock hours or other increment required to
6 complete the educational program.

7 17. Code section 94911(b) states:

8 An enrollment agreement shall include, at a minimum, all of the following:

9 (b) A schedule of total charges, including a list of any charges that are
10 nonrefundable and the student's obligations to the Student Tuition Recovery Fund,
11 clearly identified as nonrefundable charges.

12 18. California Code of Regulations, title 5, section 71710(e) states:

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

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

17 19. California Code of Regulations, title 5, section 71715(b) states:

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

20 20. California Code of Regulations, title 5, section 71720(a)(1) states:

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

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

27 21. California Code of Regulations, title 5, section 71760 states:

28 Each institution shall develop and maintain adequate procedures used by the
institution to assure that it is maintained and operated in compliance with the Act and
this Division.

29 22. California Code of Regulations, title 5, section 71770(a)(1) states:

(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 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 (1) Each student admitted to an undergraduate degree program, or a diploma
2 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.

3 23. California Code of Regulations, title 5, section 71770(b) states:

4 (b) The institution shall specify the maximum credit it will transfer from
5 another institution for each educational program, and the basis upon which the
transferred credit will be awarded.

6 (1) Except as limited by subdivision (c) of this section, a maximum of 75
7 percent of the units or credit that may be applied toward the award of a bachelor's
8 degree may be derived from a combination of any or both of the following:

9 (A) Units earned at institutions approved by the Bureau, public or private
10 institutions of higher learning accredited by an accrediting association recognized by
the U. S. Department of Education, or any institution of higher learning, including
11 foreign institutions, if the institution offering the undergraduate program documents
that the institution of higher learning at which the units were earned offers degree
12 programs equivalent to degree programs approved by the Bureau or accredited by an
accrediting association recognized by the U.S. Department of Education;

13 (B) Challenge examinations and standardized tests such as the College Level
14 Placement Tests (CLEP) for specific academic disciplines.

15 (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
16 degree. An institution may accept transfer credits only from the institutions of higher
learning described in subsection (1)(A).

17 (3) No more than 30 graduate semester credits or its equivalent awarded by
18 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
19 state licensure where the licensing agency has a regulation permitting a different
20 standard.

21 24. California Code of Regulations, title 5, section 71770(c) states:

22 (c) If credit for prior experiential learning is to be granted, the policy for
23 granting such credit shall be included in the institution's catalog.

24 (1) An institution may grant credit to a student for prior experiential learning
only if:

25 (A) The prior learning is equivalent to a college or university level of
26 learning;

27 (B) The learning experience demonstrates a balance between theory and
practice; and

28 (C) The credit awarded for the prior learning experience directly relates to the

1 student's degree program and is applied in satisfaction of some of the degree
2 requirements.

3 (2) Each college or university level learning experience for which credit is
4 sought shall be documented by the student in writing.

5 (3) Each college or university level learning experience shall be evaluated by
6 faculty qualified in that specific subject area who shall ascertain (1) to what college
7 or university level learning the student's prior experience is equivalent and (2) how
8 many credits toward a degree may be granted for that experience.

9 (4) The faculty evaluating the prior learning shall prepare a written report
10 indicating all of the following:

11 (A) The documents in the student's record on which the faculty member
12 relied in determining the nature of the student's prior experience;

13 (B) The bases for determining that the prior experience (i) is equivalent to
14 college or university level learning and (ii) demonstrates a balance between theory
15 and practice; and

16 (C) The bases for determining (i) to what college or university level the
17 experience is equivalent and (ii) the proper number of credits to be awarded toward
18 the degree for that experience.

19 (5)(A) The institution shall designate at least one administrator to be
20 responsible for the review of faculty determinations regarding the award of credit for
21 prior experiential learning.

22 (B) The administrator shall document the institution's periodic review of
23 faculty evaluations to assure that the faculty written evaluations and awards of credit
24 comply with this section and the institution's policies and are consistent.

25 (6) The amount of credit awarded for prior experiential learning shall not be
26 related to the amount charged the student for the assessment process.

27 (7)(A) Of the first 60 semester credits awarded a student in an undergraduate
28 program, no more than 15 semester credits may be awarded for prior experiential
learning.

(B) Of the second 60 semester units (i.e., credits 61 to 120) awarded a student
in an undergraduate program, no more than 15 semester credits may be awarded for
prior experiential learning.

(C) Of the first 30 semester credits awarded a student in a graduate program,
no more than 6 semester credits may be awarded for prior experiential learning.

(D) Of the second 30 semester credits (i.e., credits 31 to 60) awarded a student
in a graduate program, no more than 3 semester credits may be awarded for prior
experiential learning.

(E) No credit for experiential learning may be awarded after a student has
obtained 60 semester credits in a graduate program.

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25. California Code of Regulations, title 5, section 71775 states:

(a) An unaccredited institution enrolling a student in a degree program that has received provisional approval shall, prior to execution of an enrollment agreement, provide the student with the following notice, which shall be in at least 12-point type in the same font as the enrollment agreement:

‘Notice to Prospective Degree Program Students

This institution is provisionally approved by the Bureau for Private Postsecondary Education to offer degree programs. To continue to offer this degree program, this institution must meet the following requirements:

• Become institutionally accredited by an accrediting agency recognized by the United States Department of Education, with the scope of the accreditation covering at least one degree program.

• Achieve accreditation candidacy or pre-accreditation, as defined in regulations, by (date two years from date of provisional approval), and full accreditation by (date five years from date of provisional approval).

If this institution stops pursuing accreditation, it must:

- Stop all enrollment in its degree programs, and
- Provide a teach-out to finish the educational program or provide a refund.

An institution that fails to comply with accreditation requirements by the required dates shall have its approval to offer degree programs automatically suspended.

Institutional Representative Initials: _____ Student Initials: _____

Date: _____ Date: _____

(b) The student and an institutional representative shall initial and date the notice prior to executing an enrollment agreement. An initialed copy of the notice shall be given to the student and the original shall be retained in the enrolled student's records.

(c) The notice shall also be posted immediately preceding or following as to clearly pertain to the description of the degree program, including, but not limited to, one or more of the following; admissions requirements, length of program, courses offered or areas of focus. Such notice shall be included, at a minimum, in the following locations:

- (1) The institution's catalog where each degree program is described.
- (2) The institution's website where each degree program is described.
- (3) The institution's degree program brochures.

1 26. California Code of Regulations, title 5, section 71810(b)(3) states:

2 (b) The catalog shall contain the information prescribed by Section 94909 of
3 the Code and all of the following

4 (3) If the institution admits students from other countries, whether visa services
5 are provided or whether the institution will vouch for student status, and any
6 associated charges;

7 27. California Code of Regulations, title 5, section 71810(b)(6) states:

8 (b) The catalog shall contain the information prescribed by Section 94909 of
9 the Code and all of the following:

10 (6) The institution's policies and practices regarding any form of financial aid,
11 including all consumer information which the institution is required to disclose to the
12 student under any state or federal financial aid program;

13 28. California Code of Regulations, title 5, section 71810(b)(7) states:

14 (b) The catalog shall contain the information prescribed by Section 94909 of
15 the Code and all of the following:

16 (7) The institution's policies and procedures for the award of credit for prior
17 experiential learning, including assessment policies and procedures, provisions for
18 appeal, and all charges that a student may be required to pay;

19 29. California Code of Regulations, title 5, section 71920(b)(1)(A) states:

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

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

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

30. California Code of Regulations, title 5, section 76215 states:

(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

1 2. Your total charges are not paid by any third-party payer such as an employer,
2 government program or other payer unless you have a separate agreement to repay
the third party.

3 You are not eligible for protection from the STRF and you are not required to
4 pay the STRF assessment, if either of the following applies:

5 1. You are not a California resident, or are not enrolled in a residency program,
6 or

7 2. Your total charges are paid by a third party, such as an employer,
8 government program or other payer, and you have no separate agreement to repay the
third party.”

9 (b) In addition to the statement described under subdivision (a) of this section, a
10 qualifying institution shall include the following statement on its current schedule of
student charges:

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

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

16 1. The school closed before the course of instruction was completed.

17 2. The school's failure to pay refunds or charges on behalf of a student to a third
18 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.

19 3. The school's failure to pay or reimburse loan proceeds under a federally
20 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.

21 4. There was a material failure to comply with the Act or this Division within
22 30 days before the school closed or, if the material failure began earlier than 30 days
23 prior to closure, the period determined by the Bureau.

24 5. An inability after diligent efforts to prosecute, prove, and collect on a
judgment against the institution for a violation of the Act.”

25 However, no claim can be paid to any student without a social security number or a
26 taxpayer identification number.

FOURTH CAUSE FOR DENIAL OF APPLICATION

(Duly Qualified Faculty)

(Cal. Educ. Code § 94887; Cal. Code Regs., title 5, § 71720, subd. (a)(1))

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3 34. Respondent's application is subject to denial because it failed to include the requisite
4 information regarding its faculty. (Cal. Educ. Code § 94887; Cal. Code Regs., title 5, § 71720,
5 subd. (a)(1)). In particular, J.K.² is listed as the instructor for HST 105 U.S. History and SOC
6 101 Principles of Sociology, R.B. is listed as the instructor for POL 101 Political Science, MATH
7 110 Advanced Alegbra/Pre-Calculus, MATH 118 Statistics and MATH 125 Calculus and E.S. is
8 listed as the instructor for PHY 105 General Physics, but there is no documentation showing that
9 these individuals are duly qualified to teach those courses. Respondent has therefore failed to
10 provide evidence that it has the capacity to meet the minimum operating standards.

FIFTH CAUSE FOR DENIAL OF APPLICATION

(Catalog)

11
12 **(Cal. Educ. Code § 94887; Cal. Educ. Code § 94909, subd. (a)(8)(A); Cal. Educ. Code §**
13 **94897, subd. (p); Cal. Educ. Code § 94911, subd. (b); Cal. Educ. Code § 94909, subd.**
14 **(a)(10); Cal. Code Regs., title 5, § 71770, subd. (a)(1); Cal. Code Regs., title 5, § 71920, subd.**
15 **(b)(1)(A); Cal. Code Regs., title 5, § 71810, subd. (b)(6); Cal. Educ. Code § 94909, subd.**
16 **(a)(1); Cal. Code Regs., title 5, § 71770(c); § 71770, subd. (b); Cal. Code Regs., title 5 §**
17 **71775; Cal. Code Regs., title 5, Cal. Code Regs., title 5, § 71810, subd. (b)(3); Cal. Code**
18 **Regs., title 5, § 71810, subd. (b)(7); Cal. Educ. Code § 94909, subd. (a)(1); Cal. Educ. Code §**
19 **94909, subd. (a)(5); Cal. Educ. Code § 94909, subd. (a)(4))**

20
21 35. Respondent's application is subject to denial because it failed to include the requisite
22 information in its proposed catalog, included ambiguous information in the proposed catalog and
23 included misinformation in the proposed catalog. Respondent has therefore failed to provide
24 evidence that it has the capacity to meet the minimum operating standards. In particular:

25 a. Respondent's proposed catalog contains a noncompliant admissions policy for the
26 Bachelor of Arts in Business Administration, Fashion Design Certificate, Network Specialist
27 Certificate and English as a Second Language Certificate Programs, in that it allows students to
28 make self-attestations that they possess high school diplomas or its equivalent, rather than
requiring the actual diplomas or other documentation. (Cal. Educ. Code § 94887; Cal. Code
Regs., title 5, § 71770, subd. (a)(1); Cal. Code Regs., title 5, § 71920, subd. (b)(1)(A)).

² In the interests of privacy, proposed faculty members' initials, rather than full names, have been used. These individuals' full names were included in the Notice of Denial of Application for Approval to Operate.

1 b. Respondent's proposed catalog is missing a notice to prospective unaccredited degree
2 program students (Cal. Code Regs., title 5, § 71775).

3 c. Respondent's proposed catalog is missing disclosures for the presence or absence of
4 articulation agreements (Cal. Educ. Code § 94909(a)(8)(A)).

5 d. Respondent's proposed catalog is missing its policies and procedures for the award of
6 credit for prior experiential learning (Cal. Code Regs., title 5, § 71810, subd. (b)(7); Cal. Code
7 Regs., title 5, § 71770(c)).

8 e. Respondent's proposed catalog is missing the required disclosures for unaccredited
9 institutions offering a degree program, or accredited institutions offering an unaccredited degree
10 program, describing the known limitations of the degree program (Cal. Educ. Code § 94897(p)).

11 f. Respondent's schedule of tuition and fees in its proposed catalog does not show
12 Student Tuition Recovery Fund fees as non-refundable (Cal. Educ. Code § 94911(b)).

13 g. Respondent's proposed catalog does not contain a statement reporting as to whether
14 the institution participates in federal and state financial aid programs, and if so, all required
15 disclosures (Cal. Educ. Code § 94909(a)(10)).

16 h. Respondent's proposed catalog does not contain its policies and practices and
17 required disclosures for any form of financial aid (Cal. Code Regs., title 5, § 71810, subd. (b)(6)).

18 i. Page 8 of Respondent's proposed catalog states that transfer credits may be accepted
19 from a "recognized" school which is unclear (Cal. Educ. Code § 94909, subd. (a)(8)(A); Cal.
20 Code Regs., title 5, § 71770, subd. (b)).

21 j. Pages 10-11 of Respondent's proposed catalog describes the enrollment process for
22 international students even though it does not have the approval to issue I-20 forms from the
23 Department of Homeland Security (Cal. Code Regs., title 5, § 71810, subd. (b)(3)).

24 k. Pages 71 and 73 of Respondent's proposed catalog refers to another, unrelated
25 institution known as "SU" in its program descriptions (Cal. Educ. Code § 94909, subd. (a)(1)).

26 l. Page 49 of Respondent's proposed catalog states that students must complete a
27 minimum of 72 units in order to receive an English as Second Language Certificate while pages
28

1 50-55 state that a student must complete 72 hours, not units for that certificate (Cal. Educ. Code §
2 94909, subd. (a)(5)).

3 m. Pages 49-52 of Respondent's proposed catalog lists course titles and credits required
4 for English as Second Language Certificate while pages 53-57 list different course titles and
5 credits for that Certificate (Cal. Educ. Code § 94909, subd. (a)(5)).

6 n. Page 58 of Respondent's proposed catalog states that it is offering a Bachelor of
7 Science in Computer Networking and Security degree when it is not approved to offer that degree
8 (Cal. Educ. Code § 94909, subd. (a)(5)).

9 o. Pages 61-66 of Respondent's proposed catalog do not specify if the credits required
10 for the Network Specialist Certificate Program are units or hours (Cal. Educ. Code § 94909, subd.
11 (a)(5)).

12 p. Pages 64-66 of Respondent's proposed catalog do not list any units or hours for the
13 courses described on those pages (Cal. Educ. Code § 94909, subd. (a)(5)).

14 q. Page 32 of Respondent's proposed catalog refers to distance education programs but
15 Respondent is not requesting approval for such programs (Cal. Educ. Code § 94909, subd. (a)(4)).

16 **SIXTH CAUSE FOR DENIAL OF APPLICATION**
17 **(Self-Monitoring Procedures)**
18 **(Cal Code Regs., title 5, § 71760)**

19 36. Respondent's application is subject to denial because it did not include the self-
20 monitoring procedures employed to assure the institution is maintained and operated in
21 compliance with the California Education Code and California Code of Regulations, title 5. (Cal.
22 Code Regs., title 5, § 71760). Respondent has therefore failed to provide evidence that it has the
23 capacity to meet the minimum operating standards.

24 **SEVENTH CAUSE FOR DENIAL OF APPLICATION**
25 **(Course Syllabi)**
26 **(Cal. Code Regs., title 5, § 71710, subds. (b), (c), (d), (e) and (f))**

27 37. Respondent's application is subject to denial because there is no course syllabi
28 submitted by Respondent for multiple courses, identical syllabi were submitted for multiple
courses and unrelated syllabi for another institution were submitted. (Cal. Code Regs., title 5, §

1 71710, subs. (b), (c), (d), (e) and (f)). In particular, Respondent failed to submit course syllabi
2 for multiple courses in its Master of Business Administration Program, Fashion Design
3 Certificate Program, English as a Second Language Certificate Program and Network Specialist
4 Certificate Program. Identical syllabi were submitted for (a) BUS 400 Advance Financial
5 Management and FIN 400 Advanced Financial Management and (b) BUS 112 BUSIN ACC 103
6 Accounting III and BUS 112 Business Plan. Syllabi from an unrelated institution were submitted
7 for ACC 101 Accounting I, ACC 102 Accounting II, ACC 103 Accounting III, BUS 103
8 Business Law, BUS 300 Financial Management and Tax 101 Tax Accounting courses.
9 Respondent has therefore failed to provide evidence that it has the capacity to meet the minimum
10 operating standards.

11 **EIGHTH CAUSE FOR DENIAL OF APPLICATION**
12 **(Enrollment Agreements)**
13 **(Cal Educ. Code, § 94911, subd. (a))**

14 38. Respondent's application is subject to denial because it submitted enrollment
15 agreements which contained ambiguous program degree and certificate titles. In particular, the
16 title for the Bachelor of Arts in Business Administration degree is identified as a "Master
17 Degree," the title for the English as a Second Language Certificate is identified as a "Master
18 Degree," the Fashion Design Certificate is identified as a "Master Degree," the Master of
19 Business Administration Degree is identified as a "Master Degree," and the Network Specialist
20 Certificate is identified as a "Master Degree." (Cal. Educ. Code, § 94911, subd. (a)). Respondent
21 has therefore failed to provide evidence that it has the capacity to meet the minimum operating
22 standards.

23 **PRAYER**


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

27 1. Denying the Application for Approval to Operate an Institution Non-Accredited of
28 LA University, Inc.;

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

DATED: 1/9/17


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

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