



**Bureau for Private Postsecondary Education**  
 2535 Capitol Oaks Drive, Suite 400, Sacramento, CA 95833  
 P.O. Box 980818, West Sacramento, CA 95798-0818  
 P (916) 431-6959 F (916) 263-1897 www.bppe.ca.gov



**NOTICE TO COMPLY** – CA 79461402 0618 (Ed. Code § 94935, 5 5, CCR § 75010)

Institution Name:	Sofia University	Institution Telephone:	(650) 493-4430
Institution Code:	79461402	Administrator Name:	Ross Shott
Street Address:	1069 East Meadow Circle Palo Alto, CA 94303	Date of Inspection:	6/6/2018

Nature and Facts of the Violation(s), Including a Reference to the Statute or Regulation Violated, and Manner in Which the Institution Must Correct the Violation to Achieve Compliance:

**STUDENT TUITION RECOVERY FUND**

	Education Code (CEC) or Code of Regulations (5, CCR)	Subsection, Description, and Required Correction
<b>1</b>	<b>5, CCR §76140. Record-Keeping Requirements</b>	<p>(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:</p> <ol style="list-style-type: none"> <li>(1) Student identification number,</li> <li>(2) First and last names,</li> <li>(3) Email address,</li> <li>(4) Local or mailing address,</li> <li>(5) Address at the time of enrollment,</li> <li>(6) Home address,</li> <li>(7) Date enrollment agreement signed,</li> <li>(8) Courses and course costs,</li> <li>(9) Amount of STRF assessment collected,</li> <li>(10) Quarter in which the STRF assessment was remitted to the Bureau,</li> <li>(11) Third-party payer identifying information,</li> <li>(12) Total institutional charges charged, and</li> <li>(13) Total institutional charges paid.</li> </ol> <p>(b) The qualifying institution shall maintain the data required under this section in an electronic format that is readily available and open to inspection by the Bureau upon request. The institution shall make the records immediately available to a Bureau representative conducting a site inspection or, upon written request, shall provide a copy within 14 calendar days of the request. All records shall be provided to the Bureau in an intelligible and orderly manner and in an electronic format.</p> <p><b>The institution did not maintain the 13 required data points for each student in an electronic format. The documentation was not made immediately available.</b></p>

Notice to Comply – CA 79461402 0618


Inspector's Initial: *MW*  
 Administrator's Initial: *RS*


	<p>To remedy this violation, the institution shall maintain the required data points in an electronic format and in an intelligible and orderly manner. To and document compliance, the institution shall submit a printed report for the 1<sup>st</sup> Quarter 2018 STRF Assessment Reporting period.</p> <p>The STRF eligibility documentation shall be submitted with the institution's response to the NTC and the last page of this document to the NTC Analyst no later than July 6, 2018.</p>
--	---

**INSTITUTIONAL WEBSITE AND ADVERTISEMENTS**

	Education Code (CEC) or Code of Regulations (5, CCR)	Subsection, Description, and Required Correction
2	<b>CEC §94913. Institutional Web Site Requirements</b>	<p>(a) An institution that maintains an Internet Web site shall provide on that Internet Web site all of the following: (1) The school catalog.</p> <p>The institution's website does not contain the current updated school catalog.</p> <p>To remedy the violation, the institution's current website shall be updated to contain the school catalog with the corrections below.</p> <p>To document compliance, the institution shall submit a link to the updated catalog on the institution's website with the institution's response to the NTC and the last page of this document to the NTC Analyst no later than July 6, 2018.</p>
3	<b>CEC §94913. Institutional Web Site Requirements</b>	<p>(a) An institution that maintains an Internet Web site shall provide on that Internet Web site all of the following: (2) A School Performance Fact Sheet for each educational program offered by the institution.</p> <p>The institution's website does not contain the corrected 2015/2016 School Performance Fact Sheets for each program currently offered:</p> <ul style="list-style-type: none"> <li>• Bachelors in Business Administration (online)</li> <li>• Master of Business Administration</li> <li>• Master of Business Administration (online)</li> <li>• Master's in Counseling Psychology (online)</li> <li>• Master's in Transpersonal Psychology (online)</li> <li>• Research Doctorate in Transpersonal Psychology</li> </ul> <p>To remedy the violation, the institution's website shall be updated to contain the updated and corrected 2015/2016 School Performance Fact Sheets.</p> <p>To document compliance, the institution shall submit a link to the updated SPFS's on the institution's website with the institution's response to the NTC and the last page of this document to the NTC Analyst no later than July 6, 2018.</p>
4	<b>CEC §94913. Institutional Web Site Requirements</b>	<p>(a) An institution that maintains an Internet Web site shall provide on that Internet Web site all of the following: (3) Student brochures offered by the institution.</p>

Notice to Comply – CA 79461402 0618

Inspector's Initial: 

Administrator's Initial: 

		<p>The institution's website does not contain the corrected brochures and program cards offered by the institution.</p> <p>To remedy the violation, the institution's website shall be updated to contain the corrected student brochures and program cards offered by the institution.</p> <p>To document compliance, the institution shall submit a link to the updated brochures and program cards on the institution's website with the institution's response to the NTC and the last page of this document to the NTC Analyst no later than July 6, 2018.</p>
5	<p><b>CEC §94913. Institutional Web Site Requirements</b></p>	<p>(a) An institution that maintains an Internet Web site shall provide on that Internet Web site all of the following:</p> <p>(5) The institution's most recent annual report submitted to the bureau.</p> <p>The institution's website does not contain the most recent corrected 2016 Annual Report submitted to the Bureau with the following program information:</p> <ul style="list-style-type: none"> <li>• Bachelor's in Liberal Arts (online)</li> <li>• Bachelors in Business Administration</li> <li>• Bachelors in Business Administration (online)</li> <li>• Master of Business Administration</li> <li>• Master of Business Administration (online)</li> <li>• Master of Education in Transformative Education</li> <li>• Master of Education in Transformative Education (online)</li> <li>• Master of Science in Computer Science</li> <li>• Master of Science in Computer Science (online)</li> <li>• Master's in Counseling Psychology (online)</li> <li>• Master's in Spiritual Guidance (online)</li> <li>• Master's in Transpersonal Psychology (online)</li> <li>• Master's in Women's Spirituality</li> <li>• Research Doctorate in Transpersonal Psychology</li> </ul> <p>To remedy the violation, the institution's website shall be updated to contain the updated 2016 Annual Report with program data for each educational program approved by the Bureau.</p> <p>To document compliance, the institution shall submit a link to the updated Annual Report on the institution's website with the institution's response to the NTC and the last page of this document to the NTC Analyst no later than July 6, 2018.</p>

**SCHOOL CATALOG**

	Education Code (CEC) or Code of Regulations (5, CCR)	Subsection, Description, and Required Correction
6	<p><b>CEC §94909. Minimum Requirements for School Catalog</b></p>	<p>(a) Except as provided in subdivision (d), prior to enrollment, an institution shall provide a prospective student, either in writing or electronically, with a school catalog containing, at a minimum, all of the following:</p>


Notice to Comply – CA 79461402 0618


Inspector's Initial: *MW*

Administrator's Initial: *AS*

		<p>(12) A statement specifying whether the institution has a pending petition in bankruptcy, is operating as a debtor in possession, has filed a petition within the preceding five years, or has had a petition in bankruptcy filed against it within the preceding five years that resulted in reorganization under Chapter 11 of the United States Bankruptcy Code (11 U.S.C. Sec. 1101 et seq.).</p> <p><b>The 2017/2018 Academic Catalog failed to contain a statement specifying whether the institution has a pending petition in bankruptcy, is operating as a debtor in possession, has filed a petition within the preceding five years, or has had a petition in bankruptcy filed against it within the preceding five years that resulted in reorganization under Chapter 11 of the United States Bankruptcy Code (11 U.S.C. Sec. 1101 et seq.).</b></p> <p><b>To remedy this violation, the catalog shall be updated to contain the necessary bankruptcy disclosure.</b></p> <p><b>To document compliance, the institution shall submit the corrected catalog with the last page of this document to the NTC Analyst no later than July 6, 2018.</b></p>
7	<p><b>5, CCR §71810. Catalog.</b></p>	<p>(b) The catalog shall contain the information prescribed by Section 94909 of the Code and all of the following:</p> <p>(10) A description of library and other learning resources and the procedures for student access to those resources;</p> <p><b>The 2017/2018 Academic Catalog failed to contain a description of the procedures for student access to those learning resources. The student handbook contained a description of the procedures to access learning resources.</b></p> <p><b>To remedy this violation, the catalog shall be updated to contain the description of the procedures for student access to those learning resources.</b></p> <p><b>To document compliance, the institution shall submit the corrected catalog with the last page of this document to the NTC Analyst no later than July 6, 2018.</b></p>
8	<p><b>CEC §94909. Minimum Requirements for School Catalog</b></p>	<p>(a) Except as provided in subdivision (d), prior to enrollment, an institution shall provide a prospective student, either in writing or electronically, with a school catalog containing, at a minimum, all of the following:</p> <p>(9) The schedule of total charges for a period of attendance and an estimated schedule of total charges for the entire educational program.</p> <p><b>The schedule of charges identified in the catalog did not contain the Student Tuition Recovery Fund (STRF) Assessment Fee of \$0.00 per \$1,000 of institutional charges, clearly identified as non-refundable.</b></p> <p><b>The schedule of charges identified in the catalog identified an Acceptance Fee of \$400 for domestic students and \$1,000 for international students,</b></p>

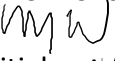

Notice to Comply – CA 79461402 0618

Inspector's Initial: 

Administrator's Initial: 

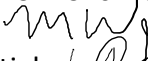
		<p>and a \$55 Application Fee. The enrollment agreement identifies a \$200 Acceptance Fee and \$50 Application Fee.</p> <p>To remedy the violation, the catalog shall be updated to contain a scheduled of total charges shall identify the non-refundable STRF Assessment fee of \$0.00 per \$1,000 of institutional charges, and update the Acceptance Fee and Application Fee as identified in the enrollment agreement.</p> <p>To document compliance, the institution shall submit the corrected catalog with the last page of this document to the NTC Analyst no later than July 6, 2018.</p>
9	<p><b>CEC §94909. Minimum Requirements for School Catalog</b></p>	<p>(a) Except as provided in subdivision (d), prior to enrollment, an institution shall provide a prospective student, either in writing or electronically, with a school catalog containing, at a minimum, all of the following:</p> <p>(8) A detailed description of institutional policies in the following areas:</p> <p>(B) Cancellation, withdrawal, and refund policies, including an explanation that the student has the right to cancel the enrollment agreement and obtain a refund of charges paid through attendance at the first class session, or the seventh day after enrollment, whichever is later. The text shall also include a description of the procedures that a student is required to follow to cancel the enrollment agreement or withdraw from the institution and obtain a refund consistent with the requirements of Article 13 (commencing with Section 94919).</p> <p><b>CEC §94919. Institution Participating in Federal Student Financial Aid Programs</b></p> <p>(c) The institution shall also provide a pro rata refund of nonfederal student financial aid program moneys paid for institutional charges to students who have completed 60 percent or less of the period of attendance.</p> <p><b>5, CCR §71750. Withdrawals and Refunds.</b></p> <p>(c) A pro rata refund pursuant to section 94919(c) or 94920(d) or 94927 of the Code shall be no less than the total amount owed by the student for the portion of the educational program provided subtracted from the amount paid by the student, calculated as follows:</p> <p>(1) The amount owed equals the daily charge for the program (total institutional charge, divided by the number of days or hours in the program), multiplied by the number of days student attended, or was scheduled to attend, prior to withdrawal.</p> <p><b>The 2017/2018 Academic Catalog does not contain a withdrawal policy which allows for a student to withdraw and receive a pro-rata refund if a student withdraws from a period of attendance within 60% of a period of attendance.</b></p> <p><b>To remedy the violation, the catalog shall be updated to give the students the right to allow a student to withdraw and receive a pro-rata refund if</b></p>


Notice to Comply – CA 79461402 0618

Inspector's Initial:   
 Administrator's Initial: 

		<p>a student withdraws from a period of attendance within 60% of a period of attendance</p> <p>To document compliance, the institution shall submit the corrected catalog with the last page of this document to the NTC Analyst no later than July 6, 2018.</p>
10	<p><b>CEC §94909. Minimum Requirements for School Catalog</b></p>	<p>(a) Except as provided in subdivision (d), prior to enrollment, an institution shall provide a prospective student, either in writing or electronically, with a school catalog containing, at a minimum, all of the following:</p> <p>(11) A statement specifying that, if a student obtains a loan to pay for an educational program, the student will have the responsibility to repay the full amount of the loan plus interest, less the amount of any refund, and that, if the student has received federal student financial aid funds, the student is entitled to a refund of the moneys not paid from federal student financial aid program funds.</p> <p><b>The 2017/2018 Academic Catalog does not contain a statement specifying that, if a student obtains a loan to pay for an educational program, the student will have the responsibility to repay the full amount of the loan plus interest, less the amount of any refund.</b></p> <p><b>To remedy this violation, the catalog shall be updated to contain a statement specifying that, if a student obtains a loan to pay for an educational program, the student will have the responsibility to repay the full amount of the loan plus interest, less the amount of any refund.</b></p> <p><b>To document compliance, the institution shall submit the corrected catalog with the last page of this document to the NTC Analyst no later than July 6, 2018.</b></p>
11	<p><b>5, CCR §71810. Catalog.</b></p>	<p>(b) The catalog shall contain the information prescribed by Section 94909 of the Code and all of the following:</p> <p>(13) Housing information including all of the following:</p> <p>(B) The availability of housing located reasonably near the institution's facilities and an estimation of the approximate cost or range of cost of the housing;</p> <p><b>The 2017/2018 Academic Catalog failed to contain the availability of housing located reasonable near the institution and the approximate cost of the housing.</b></p> <p><b>To document compliance, the institution shall submit the corrected catalog with the last page of this document to the NTC Analyst no later than July 6, 2018.</b></p>
12	<p><b>5, CCR §71810. Catalog.</b></p>	<p>(b) The catalog shall contain the information prescribed by Section 94909 of the Code and all of the following:</p> <p>(15) Policies on the retention of student records.</p> <p><b>The 2017/2018 Academic Catalog did not contain the institution's policies on the retention of student records. The institution shall</b></p>

Notice to Comply – CA 79461402 0618

Inspector's Initial: 

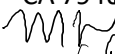

Administrator's Initial: 

	<p><b>maintain academic and financial records for a minimum of five years, and transcripts shall be maintained permanently.</b></p> <p><b>To remedy the violation, the catalog shall be updated to contain the institution’s policy on the retention of student records. Be advised, the policies shall be in compliance with CEC §94900 and 5, CCR §71920 and §71930.</b></p> <p><b>To document compliance, the institution shall submit the corrected catalog with the last page of this document to the NTC Analyst no later than July 6, 2018.</b></p>
--	--

**STUDENT RECORDS**

	<b>Education Code or Code of Regulations</b>	<b>Subsection, Description, and Required Correction</b>
13	<b>5, CCR §71920. Student Records.</b>	<p>(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:            (5) In addition to the requirements of section 94900(b) of the Code, a transcript showing all of the following:            (A) The courses or other educational programs that were completed, or were attempted but not completed, and the dates of completion or withdrawal.</p> <p><b>The transcript maintained in graduated student files did not contain the date on which that degree was granted or the date of withdrawal.</b></p> <p><b>To remedy this violation, the institution shall submit transcript template containing the date on which the degree was granted or the date of withdrawal.</b></p> <p><b>To document compliance, the institution shall submit the corrected transcript template with the last page of this document to the NTC Analyst no later than July 6, 2018.</b></p>
14	<b>5, CCR §71920. Student Records.</b>	<p>(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:            (5) In addition to the requirements of section 94900(b) of the Code, a transcript showing all of the following:            (E) The name, address, website address, and telephone number of the institution.</p> <p><b>Institutional transcripts did not include the institution’s telephone number.</b></p> <p><b>To remedy this violation, the institution shall update the transcript template to contain the institution’s telephone number.</b></p> <p><b>To document compliance, the institution shall submit the corrected transcript template with the last page of this document to the NTC Analyst no later than July 6, 2018.</b></p>

Notice to Comply – CA 79461402 0618

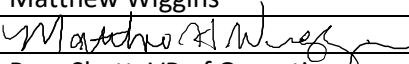

Inspector’s Initial:   
 Administrator’s Initial: 

15	<p><b>5, CCR §71920. Student Records.</b></p>	<p>(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:</p> <p>(3) Copies of all documents signed by the student, including contracts, instruments of indebtedness, and documents relating to financial aid.</p> <p><b>Student records maintained by the institution did not contain a signed School Performance Fact Sheet pursuant to CEC §94902(b)(3) and §94912.</b></p> <p><b>CEC §94902(b)(3) states, “Prior to the execution of the enrollment agreement, the student and the institution have signed and dated the information required to be disclosed in the Student Performance Fact Sheet pursuant to subdivisions (a) to (d), inclusive, of Section 94910. Each of these items in the Student Performance Fact Sheet shall include a line for the student to initial and shall be initialed and dated by the student.”</b></p> <p><b>CEC §94912 states, “Prior to the execution of an enrollment agreement, the information required to be disclosed pursuant to subdivisions (a) to (d), inclusive, of Section 94910 shall be signed and dated by the institution and the student. Each of these items shall also be initialed and dated by the student.”</b></p> <p><b>To remedy this violation, the signed SPFS and all other documents requiring a student signature shall be maintained in the student’s file or as an institutional record. The institution shall submit with their NTC response, documentation of an established policy and procedure requiring all documents signed by the student to be placed and maintained in the student’s file.</b></p> <p><b>To document compliance, the institution shall submit their updated policy with the last page of this document to the NTC Analyst no later than July 6, 2018.</b></p>
16	<p><b>5, CCR §71920. Student Records.</b></p>	<p>(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:</p> <p>(10) A document specifying the amount of a refund, including the amount refunded for tuition and the amount for other itemized charges, the method of calculating the refund, the date the refund was made, and the name and address of the person or entity to which the refund was sent.</p> <p><b>The institution did not maintain withdrawn student files which contained a document specifying the amount of refund obligated to the student, including the amount refunded for tuition and other itemized charges, the method of calculating the refund, and the date the refund was made, and the name and address of the person or entity to which the refund was sent.</b></p>



		<p>To remedy this violation, the institution shall provide a copy of the refund calculation document template specifying the amount of refund obligated to the student, including the amount refunded for tuition and other itemized charges, the method of calculating the refund, and the date the refund was made, and the name and address of the person or entity to which the refund was sent. The institution shall provide with their NTC response documentation of the institution's established policy and procedure for calculating and issuing accurate refunds to students and maintaining that documentation in each withdrawn student's file.</p> <p>To document compliance, the institution shall submit their updated policy with the last page of this document to the NTC Analyst no later than July 6, 2018.</p>
17	<p><b>CEC §94902. General Enrollment Requirements.</b></p>	<p>(a) A student shall enroll solely by means of executing an enrollment agreement. The enrollment agreement shall be signed by the student and by an authorized employee of the institution.</p> <p><b>Enrollment agreements found in student files were not signed by an authorized employee of the institution.</b></p> <p>To remedy this violation, the institution shall submit with their NTC response an established policy and procedure requiring all enrollment agreements be signed by the student and an authorized employee at the time of enrollment.</p> <p>To document compliance, the institution shall submit their updated policy with the last page of this document to the NTC Analyst no later than July 6, 2018.</p>

Only minor violations are listed on this Notice to Comply.

Inspector's Name	Matthew Wiggins
Inspector's Signature	
Institution Administrator Name/Title:	Ross Shott, VP of Operations
Institution Administrator's Signature:	

Education Code can be located at: [http://www.bppe.ca.gov/lawsregs/ppe\\_act.shtml](http://www.bppe.ca.gov/lawsregs/ppe_act.shtml)

Code of Regulations can be located at: <http://www.bppe.ca.gov/lawsregs/regs.shtml>

Notice to Comply – CA 79461402 0618

Inspector's Initial:

Administrator's Initial:


RETURN THIS FORM TO THE NTC ANALYST NO LATER THAN JULY 6, 2018 WITH EITHER:  
1) VERIFICATION OF COMPLIANCE OR 2) A NOTICE OF DISAGREEMENT

IMPORTANT COMPLIANCE NOTICE

California Education Code §94935 and California Code of Regulations §75010 provide that the Bureau for Private Postsecondary Education (Bureau) shall issue a Notice to Comply for minor violations detected during a compliance inspection by the Bureau.

By no later than 30 days from the date of the inspection, you must either: 1) Remedy the noncompliance item(s), sign the below declaration and submit this form to the Bureau, along with documentation describing how compliance was achieved; or 2) File with the Bureau a written notice of disagreement, specifying the minor violation(s) described in the Notice to Comply with which you disagree, and appealing it by requesting an informal office conference. If a written notice of disagreement is not timely filed with the Bureau, the right to appeal is deemed to have been waived.

Failure to timely remedy the noncompliance item(s) or file a written request for an informal office conference may result in the Bureau taking administrative enforcement action.

DECLARATION

Attached to this document is a list describing how compliance was achieved for each violation and supporting documentation. I declare under penalty of perjury that all violations identified in this Notice to Comply are corrected as described in the attachment.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name and Title

THIS DECLARATION OR A NOTICE OF DISAGREEMENT MUST BE SUBMITTED TO THE BUREAU BY **July 6, 2018**.

Notice to Comply – CA 79461402 0618

Inspector's Initial: *MDH*

Administrator's Initial: *[Signature]*