1	1	1
1	XAVIER BECERRA Attorney General of California	
2	Armando Zambrano	
3	Supervising Deputy Attorney General ELYSE M. DAVIDSON	
4	Deputy Attorney General State Bar No. 285842	
5	300 So. Spring Street, Suite 1702 Los Angeles, CA 90013	
6	Telephone: (213) 897-2533 Facsimile: (213) 897-2804	
7	Attorneys for Complainant	
8	BEFOI	RE THE
9		CONSUMER AFFAIRS E POSTSECONDARY EDUCATION
10		CALIFORNIA
11		
12	In the Matter of the Statement of Issues Against:	Case No. 1001764
13	RICHFIELD UNIVERSITY	
14	Renewal of Approval to Operate and Offer	STATEMENT OF ISSUES
15	Educational Program for Non-Accredited Institutions Applicant	
16	Institution Code: 1936931	
17	Respondent.	
18		
19	Complainant alleges:	
20	PAR	TIES
21	1. Joanne Wenzel ("Complainant") brir	ngs this Accusation solely in her official capacity
22	as the Chief of the Bureau for Private Postsecond	lary Education ("Bureau"), Department of
23	Consumer Affairs.	
24	2. On or about May 17, 2013, the Bure	au for Private Postsecondary Education received
25	an application for Renewal of Approval to Opera	ate an Institution Non-Accredited from Richfield
26	University ("Respondent"). On or about May 10), 2013, Dr. Michael Rahni as 95% owner and
27	Roya A. Nik as 5% owner certified under penalty	y of perjury to the truthfulness of all statements,
28	///	
		1
		(RICHFIELD UNIVERSITY) STATEMENT OF ISSUES

1	answers, and representations in the application. The Bureau denied the application on March 4,	
2	2016.	
3	APPLICANT'S LICENSE HISTORY	
4	3. On or about May 17, 2013, the Bureau received an Application for Renewal of	
5	Approval to Operate an Institution Non-Accredited (Application Number 26150) from	
6	Respondent.	
7	4. On or about June 25 2013 the Bureau issued the first deficiency letter to Respondent.	
8	On or about July 22, 2013, the Bureau received a response from Respondent.	
9	5. On or about November 14, 2013, the Bureau sent the second deficiency letter to	
10	Respondent. On or about December 11, 2013, the Bureau received a response from Respondent.	
11	6. On or about January 23, 2014, the Bureau sent the third deficiency letter to	
12	Respondent. On or about February 25, 2014, the Bureau received a response from Respondent.	
13	7. On or about May 23, 2013, the Bureau sent the fourth deficiency letter to	
14	Respondent. On or about June 5, 2014, the Bureau received a response from Respondent.	
15	8. On or about November 14, 2014, the Bureau sent the fifth deficiency letter to	
16	Respondent. On or about December 22, 2014, the Bureau received a response from Respondent.	
17	9. On or about August 5, 2015, the Quality of Education Unit ("QEU") sent the sixth	
18	deficiency letter to Respondent. On or about October 2, 2015, the Bureau received a response	
19	from Respondent.	
20	10. On or about October 29, 2015, the QEU sent the seventh deficiency letter to	
21	Respondent. On or about December 15, 2015, the Bureau received a response from Respondent.	
22	11. On or about March 4, 2016, the Bureau sent Respondent a "Notice of Denial" letter.	
23	12. On or about May 11, 2016, Respondent submitted a request for an appeal.	
24	JURISDICTION	
25	13. This Accusation is brought before the Director of the Department of Consumer	
26	Affairs ("Director") for the Bureau, under the authority of the following laws. All section	
27	references are to the Education Code unless otherwise indicated.	
28	///	
	2	
	(RICHFIELD UNIVERSITY) STATEMENT OF ISSUES	

1	STATUTORY PROVISIONS ¹	
2	14. Business and Professions Code section 22 defines the term "board" to include	
3	"bureau."	
4	15. Section 94891, subdivision (b) of the Education Code states:	
5	"(b) To be granted a renewal of an approval to operate, the institution shall demonstrate its	
5	continued capacity to meet the minimum operating standards."	
7	16. Section 94909 of the Education Code states in relevant part:	
8	(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:	
)		
	(5) A description of the programs offered and a description of the instruction provided in each of the courses offered by the institution, the requirements for completion of	
2	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	
3	increments required for completion	
1	17 Section 94913 of the Education Code states in relevant part:	
5	(a) An institution that maintains an Internet Web site shall provide on that Internet Web site all of the following:	
5		
	(2) A School Performance Fact Sheet for each educational program offered by the institution	
,	REGULATORY PROVISIONS	
	18. California Code of Regulations, title 5, division 7.5, section 71700 states:	
	"The Bureau may request that an institution document compliance with the standards set	
	forth in the Act and this Division to obtain and maintain an approval to operate."	
	19. California Code of Regulations, title 5, division 7.5, section 71710 states:	
	In order to meet its mission and objectives, the educational program defined in section 94837 of the Code shall be comprised of a curriculum that includes:	
;	••••	
	¹ California Private Postsecondary Education Act of 2009, Ed. Code § 94880, et. seq. wa recently amended, effective January 1, 2015. (See Senate Bill No. 1247).	
	3	
	(RICHFIELD UNIVERSITY) STATEMENT OF ISSUE	

4
NACES).
nensive evaluation of the degree performed by a vice that is a member of the National Association of
l his or her degree is equivalent to an institution that institution outside the United States or Canada and
l institution that documents that the institution at
pproved by the Bureau or previously approved by a u; or an accredited institution in the United States or
ne of the following:
or major field of emphasis, demonstrated by, at a
ent expertise to support the institution's awarding of
omes evaluation necessary for the institution to stated mission and objectives, and for students to ectives of each course offered;
cational program that leads to a degree shall employ it in number to provide the instruction, student
iding to a Degree.
ons, title 5, division 7.5, section 71720 states:
2''
that the instruction offered leads to the achievement
ons, title 5, division 7.5, section 71715 states:
ed to the sequence of the presentation of the material g of the material
Is are to be measured;
e of subject matter to be addressed or a list of skills
essons or class sessions;
gram;
ojectives;
that are designed or organized by duly qualified le, each student shall be provided with a syllabus or

1	2. a credential generally recognized in the field of instruction.
2	(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;
3	 (9) The institution shall maintain records documenting that each faculty member is
4	duly qualified and was qualified to perform the duties to which the faculty member
5 6	was assigned, including providing instruction, evaluating learning outcomes, evaluating graduate dissertations, theses, and student projects, and participating on doctoral committees
7	FIRST CAUSE FOR DENIAL OF APPLICATION
8	(Failure to Meet Minimum Operating Standards – Description of Educational Program
9	Fails to Provide Acceptable Course Content)
10	22. Respondent's application is subject to denial under Education Code section 94891,
11	subdivision (b) and California Code of Regulations, title 5, section 71710, subdivisions (c)(4) and
12	(6), in that Respondent's syllabi and or course content do not provide sequence and frequency of
13	lessons or class sessions, or a sequential and detailed outline of subject matter to be addressed or
14	a list of skills to be learned and how those skills are to be measured. The course descriptions in
15	the catalog do not appear to be related to the course or the description is unclear and does not
16	explain what will be taught, as follows:
17	a. On November 23, 2015, the Bureau reviewed Respondent's online learning platform.
18	The platform contained one program, which was Masters of Business Administration in Global
19	Leadership. The syllabi posted online for the program did not correspond with the syllabi
20	submitted for review on October 2, 2105, and December 15, 2015.
21	SECOND CAUSE FOR DENIAL OF APPLICATION
22	(Failure to Meet Minimum Operating Standards – Description of Educational Program
23	Fails to Determine Length of Educational Programs)
24	23. Respondent's application is subject to denial under Education Code section 94891,
25	subdivision (b) and California Code of Regulations, title 5, section 71710, subdivisions (c)(3) and
26	(4), in that Respondent's syllabi and or course content do not provide the length of the
27	educational program, or the sequence and frequency of lessons or class sessions. The Bureau is
28	unable to determine the length of the educational programs, as follows:
	5
	(RICHFIELD UNIVERSITY) STATEMENT OF ISSUES

 1
 a. The syllabi Respondent submitted to the Bureau lists total program hours and two

 2
 sets of class times. However, the syllabi do not specify if both class sessions are designated for

 3
 one course or if a different course will be taken during each session. Additionally, the beginning

 4
 and end date for each class is not listed.

 5
 <u>THIRD CAUSE FOR DENIAL OF APPLICATION</u>

 6
 (Failure to Meet Minimum Operating Standards – Description of Educational Program

Fails to Provide Clear Learning Objectives)

24. Respondent's application is subject to denial under Education Code section 94891. 8 9 subdivision (b) and California Code of Regulations, title 5, section 71710, subdivisions (c)(2) and (e), and section 71715, in that Respondent's syllabi and or course content do not provide a 10 statement of educational objectives; specific learning outcomes tied to the sequence of the 11 presentation of the material to measure the students' learning of the material; or, document that 12 the instruction offered leads to the achievement of the learning objectives of each course. The 13 course description, objectives and outcomes do not correspond and the Bureau is unable to 14 determine specific and measurable outcomes for numerous class offerings. 15

16

17

7

FOURTH CAUSE FOR DENIAL OF APPLICATION

(Failure to Meet Minimum Operating Standards – Faculty)

Respondent's application is subject to denial under Education Code sections 94891,
subdivision (b) and California Code of Regulations, title 5, section 71720, subdivisions (a)(4)(A)
and (B), (a)(1), and (a)(9), in that Respondent failed to provide the Bureau with all current faculty
transcripts as requested, as follows:

- a. On or about December 1, 2013, Respondent reported in their deficiency response that
 they, "were having everyone's qualifications verified by NACES." On or about September 30,
 2015, Respondent reported that all transcripts in need of NACES evaluation had been submitted
 to Academic Evaluation Services for review. The Bureau did not receive any of the current
 faculty transcripts and is unable to determine if the institution has contracted with qualified
 faculty members.
- 28 || ///

1	FIFTH CAUSE FOR DENIAL OF APPLICATION	
2	(Failure to Meet Minimum Operating Standards – Catalog)	
3	26. Respondent's application is subject to denial under Education Code sections 94891,	
4	subdivision (b) and 94909, subdivision (a)(5), in that Respondent failed to provide descriptions of	
5	the programs offered and a description of the instruction provided in each of the courses offered	
6	by the institution, the requirements for completion of each program, including required courses,	
7	any final tests or examinations, any required internships or externships, and the total number of	
8	credit hours, clock hours, or other increments required for completion. The course descriptions	
9	presented in Respondent's catalog do not appear to be related to the course title and or do not	
10	give a clear depiction of the content of the class.	
11	SIXTH CAUSE FOR DENIAL OF APPLICATION	
12	(Failure to Meet Minimum Operating Standards – Advertising and Other Public Statements)	
13	27. Respondent's application is subject to denial under Education Code sections 94891,	
14	subdivision (b) and 94913, subdivision (a)(2), in that Respondent failed to maintain an Internet	
15	Web site that provided the School Performance Fact Sheet for each educational program offered	
16	by the institution. The Bureau notified Respondent that the link for the most recent School	
17	Performance Fact Sheet was not active in the sixth deficiency letter mailed on August 5, 2015.	
18	Respondent failed to correct the violation.	
19	///	
20	///	
21	///	
22	///	
23	///	
24	///	
25		
26	///	
27	111	
28	///	
	7	
	(RICHFIELD UNIVERSITY) STATEMENT OF ISSUE	

⁽RICHFIELD UNIVERSITY) STATEMENT OF ISSUES

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: and that following the hearing, the Director of the Department of Consumer Affairs issue a decision: f 0. Denying the application of Richfield University for a Renewal of Approval to Operate an Institution Non-Accredited; and, 7 1. Taking such other and further action as deemed necessary and proper. 8 0 9 0 10 DATED:		
3 and that following the hearing, the Director of the Department of Consumer Affairs issue a 4 decision: 5 1. Denying the application of Richfield University for a Renewal of Approval to 6 Operate an Institution Non-Accredited; and, 7 2. Taking such other and further action as deemed necessary and proper. 8 9 9 0 10 DATED: 3 JOANNE WENZEL Chief Bureau for Private Postsecondary Education Department of Consumer Affairs State of California 14 Lv2016602028 52219257.doc 00082017 17 Image: Complainant 18 19 19 10 20 11 21 11 22 11 23 11 24 11 25 11 26 11 27 11 28 11	1	PRAYER
4 decision: 5 1. Denying the application of Richfield University for a Renewal of Approval to 6 Operate an Institution Non-Accredited; and, 7 2. Taking such other and further action as deemed necessary and proper. 8 9 9 0 10 DATED:	2	WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
 1. Denying the application of Richfield University for a Renewal of Approval to Operate an Institution Non-Accredited; and, 2. Taking such other and further action as deemed necessary and proper. DATED: 3/10/17 JOANNE WENZEL Chief Bureau for Private Postsecondary Education Department of Consumer Affairs State of California Complainant LA2016602028 52219257.doc 03082017 IA3 IA4 IA5 IA5 IA6 IA6 IA6 IA6 IA7 IA7 IA7 IA8 IA8 IA8 IA8 IA8 IA8 IA9 IA9 IA9 IA9 IA1 IA1 IA10 IA10	3	and that following the hearing, the Director of the Department of Consumer Affairs issue a
6 Operate an Institution Non-Accredited; and, 7 2. Taking such other and further action as deemed necessary and proper. 8 9 9 9 10 DATED:	4	decision:
 2. Taking such other and further action as deemed necessary and proper. 2. Taking such other and further action as deemed necessary and proper. 3 DATED: <u>31017</u> <u>JOANNE WENZEL</u> Chief Bureau for Private Postsecondary Education Department of Consumer Affairs State of California <i>Complainant</i> LA2016602028 52219257.doc 03082017 18 19 20 21 23 24 25 26 27 28 	5	1. Denying the application of Richfield University for a Renewal of Approval to
A TED: 3/10/17 JOANNE WENZEL Chief Bureau for Private Postsecondary Education Department of Consumer Affairs State of California <i>Complainant</i> LA2016602028 52219257.doc 03082017 18 19 20 21 22 23 24 25 26 27 28	6	Operate an Institution Non-Accredited; and,
9 10 11 12 12 13 14 15 1.A2016602028 52219257.doc 03082017 17 18 19 20 21 22 23 24 25 26 27 28	7	2. Taking such other and further action as deemed necessary and proper.
10 11 12 13 14 15 1.42016602028 52219257.doc 03082017	8	
11 DATED: 3 10 17 12 JOANNE WENZEL Chief Bureau for Private Postsecondary Education Department of Consumer Affairs State of California Complainant 14 Complainant 15 LA2016602028 52219257.doc 16 03082017 17 10 18 19 20 11 21 12 23 14 24 14 25 14 26 14 27 14 28 14	9	
12 JOANNE WENZEL 13 Chief 14 Bureau for Private Postsecondary Education 15 LA2016602028 52219257.doc 03082017 16 03082017 17 18 19 20 21 22 23 4 25 4 26 4 27 28	10	
12 Chief 13 Department of Consumer Affairs 14 State of California 15 LA2016602028 52219257.doc 03082017 17 03082017 18 19 20 21 21 22 23 24 24 25 25 26 26 27 28 1	11	
13 Department of Consumer Affairs State of California Complainant 14 Complainant 15 LA2016602028 52219257.doc 16 03082017 17 1 18 1 19 20 21 2 23 2 24 2 25 2 26 2 27 2 28 1	12	Chief
14 Complainant 15 LA2016602028 52219257.doc 03082017 17 1 18 1 19 1 20 1 21 1 22 1 23 1 24 1 25 1 26 1 27 1 28 1	13	Department of Consumer Affairs
16 52219257.doc 17 1 18 1 19 1 20 1 21 1 22 1 23 1 24 1 25 1 26 1 27 1 28 1	14	
16 03082017 17	15	
18 19 20 21 22 23 24 25 26 27 28	16	
19 20 21 22 23 24 25 26 27 28	17	
20 21 22 23 24 25 26 27 28	18	
21 22 23 24 25 26 27 28	19	
22 23 24 25 26 27 28	20	
23 24 25 26 27 28	21	
24 25 26 27 28	22	
25 26 27 28	23	
26 27 28	24	
27 28	25	
28		
8	28	
		8 (RICHFIELD UNIVERSITY) STATEMENT OF ISSUES