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BEFORE THE
DEPARTMENT OF CONSUMER AFFAIRS
FOR THE BUREAU FOR PRIVATE POSTSECONDARY EDUCATION
STATE OF CALIFORNIA

In the Matter of the Accusation Against: **ROSSTON SCHOOL OF HAIR DESIGN;** **BHASKARA REDDY V. MUAGALA, OWNER;** **PADMAJA REDDY MUNAGALA, OWNER** **24805 Alessandro Blvd. #4** **Moreno Valley, CA 92553** **INSTITUTION CODE: 3600371** Respondent.	Case No. 1000873 **ACCUSATION**

Complainant alleges:

PARTIES

1. Leeza Rifredi (Complainant) brings this Accusation solely in her official capacity as the Deputy Bureau Chief of the Bureau for Private Postsecondary Education, Department of Consumer Affairs.

2. On or about June 1, 1981, the Bureau for Private Postsecondary Education (Bureau) issued an approval to Rosston School of Hair Design (Respondent) to operate the following programs: Barber Course, Barber Crossover Course, and Barber Instructor Training.

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Respondent's approval to operate was in full force and effect at all times relevant to the charges brought herein and will expire on November 26, 2019, unless renewed.

JURISDICTION

3. This Accusation is brought before the Director of the Department of Consumer Affairs (Director) for the Bureau, under the authority of the following laws. All section references are to the Education Code unless otherwise indicated.

4. Section 94932 provides:

> The bureau shall determine an institution's compliance with the requirements of this chapter. The bureau shall have the power to require reports that institutions shall file with the bureau in addition to the annual report, to send staff to an institution's sites, and to require documents and responses from an institution to monitor compliance. When the bureau has reason to believe that an institution may be out of compliance, it shall conduct an investigation of the institution. If the bureau determines, after completing a compliance inspection or investigation, that an institution has violated any applicable law or regulation, the bureau shall take appropriate action pursuant to this article.

5. Section 94933 provides:

> The bureau shall provide an institution with the opportunity to remedy noncompliance, impose fines, place the institution on probation, or suspend or revoke the institution's approval to operate, in accordance with this article, as it deems appropriate based on the severity of an institution's violations of this chapter, and the harm caused to students.

6. Section 94937 states:

> (a) As a consequence of an investigation, which may incorporate any materials obtained or produced in connection with a compliance inspection, and upon a finding that an institution has committed a violation, the bureau may place an institution on probation or may suspend or revoke an institution's approval to operate for:
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> . . .
>
> (2) A material violation or repeated violations of this chapter or regulations adopted pursuant to this chapter that have resulted in harm to students. For purposes of this paragraph, "material violation" includes, but is not limited to, misrepresentation, fraud in the inducement of a contract, and false or misleading claims or advertising, upon which a student reasonably relied in executing an enrollment agreement and that resulted in harm to the student.
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> . . .
>
> (c) The bureau may seek reimbursement pursuant to Section 125.3 of the Business and Professions Code.
>
> (d) An institution shall not be required to pay the cost of investigation to more than one agency.

7. Business and Professions Code section 118, subdivision (b), provides that the suspension, expiration, surrender, or cancellation of a license shall not deprive the Bureau of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

STATUTORY PROVISIONS

Substantive Changes to an Approval to Operate

8. Section 94893 provides:

> If an institution intends to make a substantive change to its approval to operate, the institution shall receive prior authorization from the bureau. Except as provided in subdivision (a) of Section 94896, if the institution makes the substantive change without prior bureau authorization, the institution's approval to operate may be suspended or revoked.

9. Section 94894 defines "substantive changes" requiring prior authorization as follows:

> (a) A change in educational objectives, including an addition of a new diploma or a degree educational program unrelated to the approved educational programs offered by the institution.
>
> (b) A change in ownership.
>
> (c) A change in control.
>
> (d) A change in business organization form.
>
> (e) A change of location.
>
> (f) A change of name.
>
> (g) A significant change in the method of instructional delivery.
>
> (h) An addition of a separate branch more than five miles from the main or branch campus.

Fair Business Practices

10. Section 94897 states:

> An institution shall not do any of the following:
>
> . . .
>
> (e) Advertise, or indicate in promotional material, that the institution is accredited, unless the institution has been accredited by an accrediting agency.
>
> . . .

Recordkeeping

11. Section 94900 states:

(a) An institution shall maintain records of the name, address, e-mail address, and telephone number of each student who is enrolled in an educational program in that institution.

(b) An institution shall maintain, for each student granted a degree or certificate by that institution, permanent records of all of the following:

(1) The degree or certificate granted and the date on which that degree or certificate was granted.

(2) The courses and units on which the certificate or degree was based.

(3) The grades earned by the student in each of those courses.

12. Section 94900.5 states:

An institution shall maintain, for a period of not less than five years, at its principal place of business in this state, complete and accurate records of all of the following information:

. . .

(b) The names and addresses of the members of the institution's faculty and records of the educational qualifications of each member of the faculty.

(c) Any other records required to be maintained by this chapter, including, but not limited to, records maintained pursuant to Article 16 (commencing with Section 94928).

Enrollment Agreements and Disclosures

13. Section 94909 provides, in pertinent part:

(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:

. . .

(15) The following statement:

"NOTICE CONCERNING TRANSFERABILITY OF CREDITS AND CREDENTIALS EARNED AT OUR INSTITUTION

The transferability of credits you earn at (name of institution) is at the complete discretion of an institution to which you may seek to transfer. Acceptance of the (degree, diploma, or certificate) you earn in (name of educational program) is also at the complete discretion of the institution to which you may seek to transfer. If the (credits or degree, diploma, or certificate) that you earn at this institution are not accepted at the institution to which you seek to transfer, you may be required to

repeat some or all of your coursework at that institution. For this reason you should make certain that your attendance at this institution will meet your educational goals. This may include contacting an institution to which you may seek to transfer after attending (name of institution) to determine if your (credits or degree, diploma, or certificate) will transfer."

14. Section 94910 states:

Prior to enrollment, an institution shall provide a prospective student with a School Performance Fact Sheet containing, at a minimum, the following information, as it relates to the educational program:

(a) Completion rates, as calculated pursuant to Article 16 (commencing with Section 94928).

(b) Placement rates, as calculated pursuant to Article 16 (commencing with Section 94928), if the educational program is designed to lead to, or the institution makes any express or implied claim related to preparing students for, a particular career, occupation, vocation, job, or job title.

(c) License examination passage rates for programs leading to employment for which passage of a state licensing examination is required, as calculated pursuant to Article 16 (commencing with Section 94928).

(d) (1) Salary or wage information, as calculated pursuant to Article 16 (commencing with Section 94928), if the institution or a representative of the institution makes any express or implied claim about the salary that may be earned after completing the educational program.

(2) Additionally, each institution that offers an educational program designed to lead to a particular career, occupation, vocation, trade, job, or job title shall disclose the wage and salary data for the particular career, occupation, trade, job, or job title, as provided by the Employment Development Department's Occupational Employment Statistics, if that data is available.

. . .

15. Section 94911 states:

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

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

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

(c) In underlined capital letters on the same page of the enrollment agreement in which the student's signature is required, the total charges for the current period of attendance, the estimated total charges for the entire educational program, and the total charges the student is obligated to pay upon enrollment.

(d) A clear and conspicuous statement that the enrollment agreement is legally binding when signed by the student and accepted by the institution.

(e) (1) A disclosure with a clear and conspicuous caption, 'STUDENT'S RIGHT TO CANCEL,' under which it is explained 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.

(2) The disclosure shall contain the institution's refund policy and a statement that, if the student has received federal student financial aid funds, the student is entitled to a refund of moneys not paid from federal student financial aid program funds.

(3) 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.

. . .

(h) The transferability disclosure that is required to be included in the school catalog, as specified in paragraph (15) of subdivision (a) of Section 94909.

(i) (1) The following statement: 'Prior to signing this enrollment agreement, you must be given a catalog or brochure and a School Performance Fact Sheet, which you are encouraged to review prior to signing this agreement. These documents contain important policies and performance data for this institution. This institution is required to have you sign and date the information included in the School Performance Fact Sheet relating to completion rates, placement rates, license examination passage rates, and salaries or wages, prior to signing this agreement.'

(2) Immediately following the statement required by paragraph (1), a line for the student to initial, including the following statement: 'I certify that I have received the catalog, School Performance Fact Sheet, and information regarding completion rates, placement rates, license examination passage rates, and salary or wage information included in the School Performance Fact sheet, and have signed, initialed, and dated the information provided in the School Performance Fact Sheet.'

. . .

16. Section 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.

17. Section 94913, subdivision (a) states:

An institution that maintains an Internet Web site shall provide on that Internet Web site all of the following:

(1) The school catalog.

(2) A School Performance Fact Sheet for each educational program offered by the institution.

(3) Student brochures offered by the institution.

(4) A link to the bureau's Internet Web site.

(5) The institution's most recent annual report submitted to the bureau.

Completion, Placement, Licensure, and Salary Disclosure Requirements

18. Section 94929 states:

(a) An institution shall annually report to the bureau, as part of the annual report, and publish in its School Performance Fact Sheet, the completion rate for each program. Except as provided in subdivision (b), the completion rate shall be calculated by dividing the number of graduates by the number of students available for graduation.

(b) In lieu of calculating graduation data pursuant to subdivision (a), an institution may report graduation data reported to, and calculated by, the Integrated Postsecondary Education Data System of the United States Department of Education.

19. Section 94929.5 states:

An institution shall annually report to the bureau, as part of the annual report, and shall publish in its School Performance Fact Sheet, all of the following:

(a) The job placement rate, calculated by dividing the number of graduates employed in the field by the number of graduates available for employment for each program that is either (1) designed, or advertised, to lead to a particular career, or (2) advertised or promoted with any claim regarding job placement.

(b) The license examination passage rates for the immediately preceding two years for programs leading to employment for which passage of a state licensing examination is required, calculated by dividing the number of graduates who pass the examination by the number of graduates who take the licensing examination the first time that the examination is available after completion of the educational program. The institution shall use state agency licensing data to calculate license examination passage rates. If those data are unavailable, the institution shall calculate the license examination passage rate in a manner consistent with regulations adopted by the bureau.

(c) Salary and wage information, consisting of the total number of graduates employed in the field and the annual wages or salaries of those graduates stated in increments of five thousand dollars ($5,000).

20. Section 94929.7 states:

(a) The information used to substantiate the rates calculated pursuant to Sections 94929 and 94929.5 shall be documented and maintained by the institution for five years from the date of the publication of those rates. An institution may retain this information in an electronic format.

(b) An institution shall provide a list of employment positions used to determine the number of graduates employed in the field for purposes of calculating job placement rates pursuant to this article.

Compliance, Enforcement, Process, and Penalties

21. Section 94934 states:

(a) As part of the compliance program, an institution shall submit an annual report to the bureau, under penalty of perjury, signed by a responsible corporate officer, by July 1 of each year, or another date designated by the bureau, and it shall include the following information for educational programs offered in the reporting period:

(1) The total number of students enrolled by level of degree or for a diploma.

(2) The number of degrees, by level, and diplomas awarded.

(3) The degree levels and diplomas offered.

(4) The Student Performance Fact Sheet, as required pursuant to Section 94910.

(5) The school catalog, as required pursuant to Section 94909.

(6) The total charges for each educational program by period of attendance.

(7) A statement indicating whether the institution is, or is not, current in remitting Student Tuition Recovery Fund assessments.

(8) A statement indicating whether an accrediting agency has taken any final disciplinary action against the institution.

(9) Additional information deemed by the bureau to be reasonably required to ascertain compliance with this chapter.

(b) The bureau, by January 1, 2011, shall prescribe the annual report's format and method of delivery.

REGULATORY PROVISIONS

Definitions

22. California Code of Regulations, Title 5, Section 7000 (Regulation 7000), provides the following pertinent definitions:

. . .

(b) "Act" means The California Private Postsecondary Education Act of 2009.

. . .

(r) "Objectives" are the goals and methods by which the institution fulfills its mission and transforms it into measurable student learning outcomes for each educational program.

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Applications for a Substantive Change to an Approval to Operate

23. California Code of Regulations, Title 5, Section 71650 (Regulation 71650), subdivision (a), provides:

> An institution seeking to change its educational objectives shall complete the "Change in Educational Objectives" form (OBJ rev. 2/10) to obtain prior authorization. The form shall be submitted to the Bureau along with the appropriate fee as provided in Section 94930.5(c) of the Code. For an institution approved under section 94885 of the Code it shall be signed and dated by the signatory(ies) required by section 71380, and for an institution approved under section 94890 of the Code it shall be signed and dated by the signatory(ies) required by section 71390, and each fact stated therein and each attachment thereto shall be declared to be true under penalty of perjury, in the following form:
>
> "I declare under penalty of perjury under the laws of the State of California that the foregoing and all attachments are true and correct.
>
> _____
>
> (Date)
>
> _____
>
> (Signature)"

24. California Code of Regulations, Title 5, Section 71660 (Regulation 71660) states:

> An institution shall notify the Bureau of a non-substantive change including: change of location of less than 10 miles; addition of a program related to the approved programs offered by the institution; addition of a new branch five miles or less from the main or branch campus; addition of a satellite; and change of mailing address. All such notifications shall be made within 30 days of the change and sent to the Bureau, in writing, to the address listed in section 70020.

Minimum Operating Standards

25. California Code of Regulations, Title 5, Section 71720 (Regulation 71720), subdivision (b), provides:

> Instructors in an Educational Program Not Leading to a Degree.
>
> . . .
>
> (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.

26. California Code of Regulations, Title 5, Section 71745 (Regulation 71745), subdivision (a), states in pertinent part:

The institution shall document that it has at all times sufficient assets and financial resources to do all of the following:

. . .

(3) Maintain the minimum standards required by the Act and this chapter.

. . .

(5) Pay all operating expenses due within 30 days.

(6) Maintain a ratio of current assets to current liabilities of 1.25 to 1.00 or greater at the end of the most recent fiscal year when using generally accepted accounting principles, or for an institution participating in Title IV of the federal Higher Education Act of 1965, meet the composite score requirements of the U.S. Department of Education. For the purposes of this section, current assets does not include: intangible assets, including goodwill, going concern value, organization expense, startup costs, long-term prepayment of deferred charges, and non-returnable deposits, or state or federal grant or loan funds that are not the property of the institution but are held for future disbursement for the benefit of students. Unearned tuition shall be accounted for in accordance with general accepted accounting principles.

27. California Code of Regulations, Title 5, Section 71750 (Regulation 71750), subdivision (f) states:

The institution shall maintain a cancellation and withdrawal log, kept current on a monthly basis, which shall include the names, addresses, telephone numbers, and dates of cancellations or withdrawal of all students who have cancelled the enrollment agreement with, or withdrawn from, the institution during the calendar year.

Admissions and Academic Achievement Standards

28. California Code of Regulations, Title 5, Section 71770 (Regulation 71770), subdivision (a), provides;

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

. . .

29. California Code of Regulations, Title 5, Section 71800 (Regulation 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:

. . .

(b) Period covered by the enrollment agreement.

(c) Program start date and scheduled completion date.

(d) Date by which the student must exercise his or her right to cancel or withdraw, and the refund policy, including any alternative method of calculation if approved by the Bureau pursuant to section 94921 of the Code.

(e) Itemization of all institutional charges and fees including, as applicable:

(1) tuition;

(2) registration fee (non-refundable);

(3) equipment;

(4) lab supplies or kits;

(5) Textbooks, or other learning media;

(6) uniforms or other special protective clothing;

(7) in-resident housing;

(8) tutoring;

(9) assessment fees for transfer of credits;

(10) fees to transfer credits;

(11) Student Tuition Recovery Fund fee (non-refundable);

(12) any other institutional charge or fee.

. . .

30. California Code of Regulations, Title 5, Section 71810 (Regulation 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.

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

. . .

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

. . .

(5) Whether any instruction will occur in a language other than English and, if so, the level of proficiency required and the kind of documentation of proficiency, such as the United States Foreign Service Language Rating System, that will be accepted . . .

Maintenance and Production of Records

31. California Code of Regulations, Title 5, Section 71920 (Regulation 71920), subdivision (b), states:

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

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

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

. . .

(4) Records of the dates of enrollment and, if applicable, withdrawal from the institution, leaves of absence, and graduation; and

(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;

. . .

(8) A copy of documents relating to student financial aid that are required to be maintained by law or by a loan guarantee agency;

(9) A document showing the total amount of money received from or on behalf of the student and the date or dates on which the money was received . . .

32. California Code of Regulations, Title 5, Section 71930 (Regulation 71930) states:

(a) An institution shall maintain all records required by the Act and this chapter. The records shall be maintained in this state.

(b)(1) In addition to permanently retaining a transcript as required by section 94900(b) of the Code, the institution shall maintain for a period of 5 years the pertinent student records described in Section 71920 from the student's date of completion or withdrawal.

. . .

(d) The institution shall maintain a second set of all academic and financial records required by the Act and this chapter at a different location unless the original records, including records stored pursuant to subdivision (b) of this section, are maintained in a manner secure from damage or loss. An acceptable manner of storage under this subsection would include fire resistant cabinets.

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

Reports

33. California Code of Regulations, Title 5, Section 74110 (Regulation 74110), subdivisions (a) and (b), provide:[1]

(a) The annual report required by section 94934 of the Code shall include the information required by section 94934 for all educational programs offered in the prior calendar year.

(b) In addition to the information required by section 94934 provided under penalty of perjury, the institution shall have annual financial statements prepared for the institution's prior fiscal year and signed under penalty of perjury, and shall submit a hard copy under separate cover of such statements in conjunction with its annual report. The form, content and mode of preparation of financial statements shall comply with section 74115 of this Division. The Bureau may request that the institution immediately make available for inspection to a representative of the Bureau, these financial statements at the offices of the institution.

34. California Code of Regulations, Title 5, Section 74112 (Regulation 74112) provides:

(a) Format. The format for the Performance Fact Sheet shall be in at least 12 pt. type, in an easily readable font, with 1.15 line spacing. The Performance Fact Sheet shall contain all and only the information required or specifically permitted by section 94910 of the Code or this chapter.

(b) In addition to the definitions contained in section 94928 of the Code:
(1) "Number of Students Who Began Program" means the number of students who began a program who are scheduled to complete the program within 100% of the published program length within the reporting calendar year, and includes all the students who remained enrolled after their cancellation period.

[1] Regulation 74100 and Regulation 74112 were amended effective July 14, 2016. The text of the regulations that were operative at the time of the alleged violations, which were prior to July 14, 2016, has been provided.

(2) "Number of Graduates" means the number of students who completed the program within 100% of the published program length within the reporting calendar year.

(3) "Graduates Employed in the Field" means those graduates who meet the definition of section 94928(e) of the Code, who have reported their employment to the institution.

(c) Reporting periods:

(1) An Annual Report shall include data for all educational programs as defined in section 94837 of the Code for the previous one calendar year.

(2) A Performance Fact Sheet shall be current and available not later than August 1st, and shall report data for the previous two calendar years based upon the "number of students who began program" or the "number of graduates," as defined in subdivision (b), for each reported calendar year.

(d) Completion Rates. Reporting of completion rates for an institution's Annual Report and Performance Fact Sheet shall include, for each educational program, the number of students who began program as defined in subdivision (b), the number of students available for graduation, number of graduates, and completion rate(s). An optional column may be added to include completion rate data for students completing within 101-150% of the published program length. For an institution reporting completion data pursuant to section 94929(b) of the Code, completion data shall be separately reported for each program. The Performance Fact Sheet shall disclose, if true, that the completion data is being reported for students completing within 150% of the published program length, and that data is not being separately reported for students completing the program within 100% of the published program length.

Completion rates shall be included in the Performance Fact Sheet in a format substantially similar to the chart below, including the footnoted information below (dates, numbers, and other data shown are for example only):

Completion Rates (includes data for the two calendar years prior to reporting)

Name of Educational Program (Program Length)

Calendar Year	Number of Students Who Began Program[1]	Students Available for Graduation[2]	Graduates[3]	Completion Rate[4]
20XX	100	98	70	71%
20XY	80	80	55	69%

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Students Completing After Published Program Length – 150% Completion Rate

Name of Educational Program (Program Length)

Calendar Year	Number of Students Who Began Program[1]	Students Available for Graduation[2]	Graduates[3]	Completion Rate[4]
20XX	100	98	70	71%
20XY	80	80	55	69%

[1] "Number of Students Who Began Program" is the number of students who began the program who are scheduled to complete the program within the reporting calendar year.

[2] "Students available for graduation" is the number of students who began program minus the number of "Students unavailable for graduation," which means those students who have died, been incarcerated, or called to active military duty.

[3] "Graduates" is the number of students who completed the program within 100% of the published program length.

[4] "Completion Rate" is the number of Graduates divided by the Number of Students Available for Graduation.

[5] "150% Graduates" is the number of students who completed the program within 101-150% of the published program length.

[6] "150% Completion Rate" is the number of students who completed the program in the reported calendar year within 101-150% of the published program length divided by the Number of Students Available for Graduation in the published program length period.

(e) Placement Rates.

(1) Any placement data required by sections 94910(b) and 94929.5(a) of the Code shall be reported for the number of students who began the program as defined in subdivision (b) for each reported calendar year.

(2) Placement is measured six months from the graduation date of each student. Reporting of placement rates shall include for each educational program: the number of students who began the program, the number of graduates as defined in subdivision (b), graduates available for employment, graduates employed in the field and placement rate(s).

(3) Placement rate shall be calculated as follows: the number of graduates employed in the field as defined in subsection 74112(b)(3) divided by the number of graduates available for employment as defined in section 94928(d) of the Code.

(4) Graduates employed in the field shall be reported for those graduates employed in the field in a single position that averages under 32 hours per week and those employed in the field in a single position that averages at least 32 hours per week.

References to the Code are to the California Education Code where the California Private Postsecondary Education Act of 2009 is located.

Placement rates shall be included in the Performance Fact Sheet in a format substantially similar to the chart below, including the footnoted information below (dates, numbers, and other data shown are for example only):

Placement Rates (includes data for the two calendar years prior to reporting)

Name of Educational Program (Program Length)

Calendar Year	Number of Students Who Began Program [1]	Number of Graduates [2]	Graduates Available for Employ-ment[3]	Graduates Employed in the Field [4]	Place-ment Rate % in the Field[5]	Graduates Employed in the Field an average of less than 32 hours per week	Graduates Employed in the Field at least 32 hours per week
20XX	100	70	70	55	79%	5	50
20XY	80	55	55	20	36%	9	11

[1] "Number of Students Who Began Program" means the number of students who began the program who are scheduled to complete the program within the reporting calendar year.

[2] "Number of Graduates" is the number of students who have completed the program within 100% of the published program length.

[3] "Graduates available for employment" means the number of graduates minus the number of graduates unavailable for employment. "Graduates unavailable for employment" means graduates who, after graduation, die, become incarcerated, are called to active military duty, are international students that leave the United States or do not have a visa allowing employment in the United States, or are continuing their education in an accredited or bureau-approved postsecondary institution.

[4] "Graduates employed in the field" means graduates who report that they are gainfully employed within six months of graduation in a position for which the skills obtained through the education and training provided by the institution are required or provided a significant advantage to the graduate in obtaining the position.

[5] Placement Rate is calculated by dividing the number of graduates gainfully employed in the field by the number of graduates available for employment.

(f) License Examination Passage Rates. If license examination passage rates are not available from the appropriate state agency, an institution shall collect the information directly from its graduates. If an institution demonstrates that, after reasonable efforts, it is unable to obtain the examination passage information from its graduates, the institution shall report the number of students it could not contact and note in a font the same size as the majority of the data on the Performance Fact Sheet, "License examination passage data is not available from the state agency administering the examination. We were unable to collect data from [enter the number] graduates."

Reporting of license examination passage rates for the Annual Report and the Performance Fact Sheet shall include, for each educational program: the number of students completing the program within 150% of published program length in the

reported year, the number of documented graduates who passed the first examination, number of documented graduates who failed the first examination, the number of graduates for whom data is not available. An optional column may be added to separately report licensing examination data for students who take and pass the exam after failing initially. The Annual Report shall also include a description of the processes for attempting to contact those students.

For licensing examinations that are not continuously administered, license examination passage rates shall be included in the Performance Fact Sheet in a format substantially similar to the chart below, including the footnoted information below (dates, numbers, and other data shown are for example only):

Examination Passage Rates (includes data for the two calendar years prior to reporting)

Name of Educational Program (Program Length)

Number of Students Taking Exam[1]	Exam Date[2]	Number Who Passed Exam	Number Who Failed Exam	Passage Rate[3]
80	2/1/20XX	40	40	50%
100	6/1/20XX	75	25	75%
82	10/1/20XX	68	14	76%
80	2/1/20XY	40	40	50%
100	6/1/20XY	70	30	70%
92	10/1/20XY	62	30	67%

License examination passage data is not available from the state agency administering the examination. We were unable to collect data from 32 graduates.

[1] Number of Students Taking Exam is the number of students who completed the program within 150% of published program length and for whom the reported exam is the first exam that was available after their completion of the program.

[2] Exam Date is the date for the first available exam after the students completed the program.

[3] Passage Rate is calculated by dividing the number of students who pass the exam by the number of graduates who take the reported licensing exam.

For licensing examinations that are continuously administered, license examination passage rates shall be included in the Performance Fact Sheet in a format substantially similar to the chart below, including the footnoted information below (dates, numbers, and other data shown are for example only):

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Examination Passage Rates (includes data for the two calendar years prior to reporting)

Name of Educational Program (Program Length)

Calendar Year	Number of Students Taking Exam[1]	Number Who Passed First Exam Taken[2]	Number Who Failed First Exam Taken	Passage Rate[3]
20XX	80	40	40	50%
20XY	100	75	25	75%

License examination passage data is not available from the state agency administering the examination. We were unable to collect data from 10 graduates.

[1] Number of Students Taking Exam is the number of students who completed the program within 150% of the published program length and who took the exam in the reported calendar year for the first time.

[2] Number Who Passed First Exam Taken is the number of students who took and passed the licensing exam in the reported calendar year on the first attempt.

[3] Passage Rate is calculated by dividing the number of graduates who pass the exam the first time that they take it by the number of graduates who took the licensing exam for the first time after completion of the program.

(g) Salary and Wage Information.

All Salary and Wage Information shall be reported to the Bureau pursuant to section 94929.5(c) of the Code and, if required by section 94910(d) of the Code, shall be included in the Performance Fact Sheet, for each educational program, in a format substantially similar to the chart below, including the footnoted information (dates, numbers, salaries, and other data shown are for example only).

Salary and Wage Information (includes data for the two calendar years prior to reporting)

Name of Educational Program (Program Length)
Annual Salary and Wages Reported by Graduates Employed in the Field[3]

Calendar Year	Graduates Available for Employment[1]	Graduates Employed in the Field[2]	$15,000.00 - $20,000.00	$20,001.00 - $25,000.00	$25,001.00 - $35,000.00	$30,001.00 - $35,000.00	Students Not Reporting Salary
20XX	100	70	5	40	6	3	16
20XY	80	55	5	7	3	5	35

[1] "Graduates available for employment" means the number of graduates minus the number of graduates unavailable for employment. Graduates unavailable for employment means graduates who, after graduation, die, become incarcerated, are called to active military duty, are international students that leave the United States or

do not have a visa allowing employment in the United States, or are continuing their education in an accredited or bureau-approved postsecondary institution.

[2] "Graduates employed in the field" means graduates who are gainfully employed within six months of graduation in a position for which the skills obtained through the education and training provided by the institution are required or provided a significant advantage to the graduate in obtaining the position.

[3] Salary is as reported by the student. Not all graduates reported salary.

(h) Documentation supporting all data reported shall be maintained by the institution for at least five years from the time included in either an Annual Report or a Performance Fact Sheet, and shall include at a minimum: student name(s), address, phone number, email address, program completed, program start and completion dates, place of employment and position, salary, hours, and a description of all attempts to contact each student. Documentation shall also include the name, email address, phone number, and position or title of the institution's representative who is primarily responsible for obtaining the students' completion, placement, licensing, and salary and wage data, the date that the information was gathered, and copies of notes, letters or emails through which the information was requested and gathered.

35. California Code of Regulations, Title 5, Section 74115 (Regulation 74115), subdivisions (b) and (c) provide:

(b) A set of financial statements shall contain, at a minimum, a balance sheet, an income statement, and a cash flow statement, and the preparation of financial statements, shall comply with all of the following:

. . .

(3) The financial statements shall establish that the institution meets the requirements for financial resources required by Section 71745.

. . .

Student Tuition Recovery Fund

36. California Code of Regulations, Title 5, Section 76120 (Regulation 76120), subdivision (a) provides:

Each qualifying institution shall collect an assessment of zero dollars ($0) per one thousand dollars ($1,000) of institutional charges, rounded to the nearest thousand dollars, from each student in an educational program who is a California resident or is enrolled in a residency program. For institutional charges of one thousand dollars ($1,000) or less, the assessment is zero dollars ($0).

37. California Code of Regulations, Title 5, Section 76130 (Regulation 76130), subdivision (b) provides:

A qualifying institution shall complete the STRF Assessment Reporting Form (Rev. 2/10) and remit it with the STRF assessments collected from students to be received by the Bureau no later than the last day of the month following the close of the

quarter as follows:

(1) April 30 for the first quarter,

(2) July 31 for the second quarter,

(3) October 31 for the third quarter, and

(4) January 31 for the fourth quarter. If the due date falls on a Saturday, Sunday or State or federal holiday, the due date shall be extended to the next regular business day for the Bureau.

If the due date falls on a Saturday, Sunday, or State or federal holiday, the due date shall be extended to the next regular business day for the Bureau.

38. California Code of Regulations, Title 5, Section 76140 (Regulation 76140), subdivision (a) provides:

A qualifying institution shall collect and maintain records of student information to substantiate the data reported on the STRF Assessment Reporting Form and records of the students' eligibility under the Fund. Such records shall include the following for each student:

(1) Student identification number,

(2) First and last names,

(3) Email address,

(4) Local or mailing address,

(5) Address at the time of enrollment,

(6) Home address,

(7) Date enrollment agreement signed,

(8) Courses and course costs,

(9) Amount of STRF assessment collected,

(10) Quarter in which the STRF assessment was remitted to the Bureau,

(11) Third-party payer identifying information,

(12) Total institutional charges charged, and

(13) Total institutional charges paid.

COST RECOVERY

39. Business and Professions Code section 125.3 provides, in pertinent part, that the Bureau may request the administrative law judge to direct a licentiate found to have committed a

violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case, with failure of the licentiate to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be included in a stipulated settlement.

FACTUAL BACKGROUND

40. On or about February 17, 2015, the Bureau conducted a compliance inspection which found a number of violations of the Code and Regulations and resulted in an investigation being opened.

41. On or about February 10, 2016, the Bureau conducted a field investigation of Respondent at which time students and staff were interviewed and documents were collected. In addition, documents were requested from Respondent before and after the field investigation. The investigation was completed on or about October 20, 2016.

FIRST CAUSE FOR DISCIPLINE

(Change in Educational Objectives Without Prior Bureau Authorization)

42. Respondent's approval to operate is subject to disciplinary action under Section 94937(a)(2), 94893, and 94894(g) and Regulations 7000(r) and 71650(a), in that Respondent made a substantive change to its approval and/or changed its educational objectives without obtaining prior Bureau authorization. The circumstances of this conduct are as follows:

a. On or about February 10, 2016, a Bureau investigator observed video tutorials being provided in Spanish. Respondent's staff confirmed that some of their students speak Spanish, and Respondent sometimes provides instruction in Spanish. The investigator also found a flier written in Spanish advertising Respondent's Barbering course.

b. As of October 20, 2016, Respondent's educational objectives did not include offering instruction in Spanish, and Respondent did not apply to the Bureau for approval to change its educational objectives prior to advertising in Spanish and offering courses taught in Spanish.

c. Respondent did not apply to the Bureau for approval to offer instruction in Spanish, which is a substantive to change to Respondent's approval to operate.

SECOND CAUSE FOR DISCIPLINE

(Failure to Notify Bureau of Non-Substantive Change)

43. Respondent's approval to operate is subject to disciplinary action under Section 94937(a)(2) and Regulation 71660, in that Respondent failed to notify the Bureau within 30 days of a making non-substantive change to its program offerings. The circumstances of this conduct are as follows:

a. In its 2015/2016 School Catalog, Respondent offered a Barber Crossover course that is 200 hours. In addition, Respondent had active enrollment agreements with students for the 200 hour Barber Crossover program. Respondent was only approved for a Barber Crossover course that is 400 hours and did not notify the Bureau it was adding a related 200 hour program.

THIRD CAUSE FOR DISCIPLINE

(Failure to Maintain Sufficient Financial Resources)

44. Respondent's approval to operate is subject to disciplinary action under Section 94937(a)(2) and Regulations 71745(a)(3), (a)(5), and (a)(6) and 74115(b)(3), in that Respondent does not meet the minimum standards for financial resources. The circumstances of this conduct are as follows:

a. According to the financial statements submitted by Respondent for the 2014 calendar year, Respondent's current assets totaled $2,876 and its current liabilities totaled $7,430. This results in an assets to liabilities ratio of 0.39 to 1.00. The minimum operating standards regarding financial resources require that an institution maintain an assets to liabilities ratio of 1.25 to 1.00 or greater.

b. Respondent ended the 2014 calendar year with a cash deficit of $29,565 and monthly operating expenses of $19,774.75. The minimum operating standards regarding financial resources require that an institution be able to pay 30 days of operating expenses.

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FOURTH CAUSE FOR DISCIPLINE

(Failure to Meet Minimum Requirements for Enrollment Agreements)

45. Respondent's approval to operate is subject to disciplinary action under Sections 94937(a)(2), 94902, 94906, 94909, and 94911 and Regulation 71800, in that Respondent did not meet the minimum requirements under the Act and Regulations for its enrollment agreements. The circumstances of this conduct are as follows:

a. Respondent's enrollment agreement with W.S. started July 15, 2015 and was completed September 15, 2015. However, in her Barber Application for Examination and Initial License Fee form, W.S. stated she attended training with Respondent from July 15, 2015 to November 20, 2015. The enrollment did not cover the dates of instruction, as required by Regulation 71800(b).

b. Respondent's enrollment agreement with W.S. did not contain the program start and completion dates, as required by Regulation 71800(c).

c. Respondent's enrollment agreement with M.F. (enrolled February 9, 2016) did not contain the date by which the student must exercise her right to cancel, as required by Regulation 71800(d).

d. Respondent's enrollment agreement with E.D. (enrolled February 10, 2015) did not contain any itemized charges, as required by Regulation 71800(e)(1-12).

e. In or around February 2015 to February 2016, Respondent did not provide catalogs or Student Performance Fact Sheets to students prior to having them sign enrollment agreements, which is required by Section 94902(b)(10).

f. Respondent's enrollment agreement with E.D. was not signed by an institution representative, as required by Section 94902(a).

g. Respondent did not provide an enrollment agreement or disclosures in Spanish, although it advertises its Barber program in Spanish. This is a violation of Section 94906(b).

h. Respondent's enrollment agreement has an incomplete "transfer of credits" disclosure, which does not comply with Section 94909(a)(15).

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i. Respondent's enrollment agreements with M.F., E.D., and W.S. did not have the name of the program listed, which is required by Section 94911(a).

j. Respondent's enrollment agreement did not have a statement that if a student has received federal aid funds, the student is entitled to a refund of moneys not paid from federal student financial aid program funds, which is required by Section 94911(e)(2).

k. Respondent's enrollment agreement does not have a line to initial after the paragraph required by Section 94911(i)(1).

FIFTH CAUSE FOR DISCIPLINE

(Failure to Exercise Reasonable Care in Determining Student Eligibility to Obtain Licensure)

46. Respondent's approval to operate is subject to disciplinary action under Sections 94937(a)(2) and 94905(a), in that Respondent admitted students without exercising reasonable care to determine that the students would be eligible to obtain licensure in the profession or occupation for which the educational program was designed. The circumstances of this conduct are as follows:

a. The student files for M.M. (enrolled January 21, 2016) and E.T. (enrolled February 1, 2016) did not contain a form of government issued identification or record of a social security number. Such information is required for the student to qualify to sit for licensure with the Board of Barbering and Cosmetology.

SIXTH CAUSE FOR DISCIPLINE

(Failure to Comply With General Enrollment Requirements)

47. Respondent's approval to operate is subject to disciplinary action under Section 94937(a)(2) and Regulation 71770(a), in that Respondent admitted students who did not comply with the program standards. The circumstances of this conduct are as follows:

a. The student file for M.F., who was enrolled in the Barber Crossover program, did not contain a document showing admission qualifications for the program, such as a transcript showing previous education, proof of training document, or an active cosmetologist license.

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b. Several student files did not contain copies of a high school diploma or its equivalency or proof of an examination meeting the requirements of Education Code section 94904.

SEVENTH CAUSE FOR DISCIPLINE

(Failure to Comply With Requirements For School Catalog)

48. Respondent's approval to operate is subject to disciplinary action under Sections 94937(a)(2) and 94909(a) and Regulation 71810, in that Respondent's 2015/2016 School Catalog did not contain all of the required information, and Respondent did not provide every student with a school catalog before having them sign an enrollment agreement. The circumstances of this conduct are as follows:

a. Students E.T. and M.M said they were not provided a catalog prior to signing an enrollment agreement, as required by Section 71810(a) and Section 94909(a).

b. Respondent's school catalog does not provide information on admitting students from other countries, although in 2016, Respondent had students enrolled from other countries. This is a violation of Regulation 71810(b)(3).

c. Respondent's school catalog states that all instruction will be provided in English, although Respondent provides instruction in Spanish. This is a violation of Regulation 71810(b)(5).

d. Respondent's school catalog does not contain program information for the Barber Instructor course offered by Respondent, which is a violation of Section 94909(a)(5). The catalog also contains conflicting information about the length of Respondent's programs. On page 10, the Barbering course is listed as taking 39.5 weeks, but on page 16, the course is listed as taking 36 weeks. The Barber Crossover course is listed as a 200 hour program, but the curriculum includes 350 hours of required study.

c. Respondent's school catalog does not contain a schedule for total charges for a period of attendance and an estimated schedule of total charges for the entire educational program, as required by Section 94909(a)(9).

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EIGHTH CAUSE FOR DISCIPLINE

(Failure to Maintain Required Institutional Records)

49. Respondent's approval to operate is subject to disciplinary action under Sections 94937(a)(2) and 94900(b) and Regulations 71920 and 71930, in that Respondent failed to maintain the records required under the Act and Regulations. The circumstances of this conduct are as follows:

a. Respondent does not maintain records of previous education which would qualify a student for enrollment in the Barber Crossover program, including proof of training documents, evidence of licensure, or transcripts from previous institutions attended, which is required for admission to the Barber Crossover program. This is a violation of Regulation 71920(b)(1).

b. Respondent does not maintain proof of high school graduation or its equivalency for its enrolled students, which is required by Regulation 71920(b)(1)(A).

c. Respondent does not maintain records of the dates of cancellation or withdrawal by students, including paperwork showing funds received and possible refund that would be required. This is a violation of Regulation 71920(b)(4).

d. Respondent does not maintain transcripts for students that have graduated, which is required by Regulations 71920(b)(5)(A) and 71930(b)(1) and Section 94900(b).

e. Respondent does not maintain financial aid documents for students who are being charged a different tuition cost than what is listed in the school catalog, which is required by Regulation 71920(b)(8).

f. Respondent does not maintain in its student files a document showing the total amount of money received from or on behalf of a student. This is a violation of Regulation 71920(b)(9).

g. Respondent does not maintain information regarding placement rates for its students that have graduated, which is required by Sections 94910 and 94929.5. The failure to maintain records required under the Act is a violation of Regulation 71930(a) and Section 94900.5(c).

h. Respondent does not maintain student files in a manner that is secure from damage or loss and does not maintain a second set of the files, which is a violation of Regulation 71930(d).

i. During the investigation by the Bureau on February 10, 2016, Respondent was unable to provide copies of its faculty list, faculty files, and financial statements, which are records required to be maintained under the Act and made immediately available to the Bureau during normal business hours. This is a violation of Regulation 71930(e) and Section 94900.5(b).

j. Respondent's files for students E.D. and W.S. did not contain graduation certificates or transcripts showing the courses taken or grades earned by the students, which information is required to be maintained for graduates under Section 94900(b)(1), (2), and (3).

NINTH CAUSE FOR DISCIPLINE

(Failure to Maintain a Cancellation and Withdrawal Log)

50. Respondent's approval to operate is subject to disciplinary action under Section 94937(a)(2), in that Respondent failed to maintain a withdrawal log as required by Regulation 71750(f).

TENTH CAUSE FOR DISCIPLINE

(Failure to Meet Continuing Education Requirements)

51. Respondent's approval to operate is subject to disciplinary action under Section 94937(a)(2) and Regulation 71720(b)(2), in that Respondent was unable to provide documentation that L.B., a Barber Instructor, had completed any continuing education courses.

ELEVENTH CAUSE FOR DISCIPLINE

(Failure to Meet Minimum Requirements for Student Performance Fact Sheet)

52. Respondent's approval to operate is subject to disciplinary action under Section 94937(a)(2), in that Respondent's Student Performance Fact Sheet (SPFS) for 2014 did not contain all of the information required under Section 94910, 94912, and 94929.5 and Regulation 74112. The circumstances of this conduct are as follows:

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a. The 2014 SPFS did not include information for the Barber Instructor Training program, although the program was still being offered during that time period. This is a violation of Sections 94910(a)-(d) and 94929.5(a) and Regulation 74112(c)-(g).

b. The 2014 SPFS did not include data for the previous two calendar years, as required by Section 94929.5(a)(2) and Regulation 74112(c)(2).

c. The license examination passage rates in the 2014 SPFS did not match the results reported by the Board of Barbering and Cosmetology for the exam. Accordingly, Respondent did not report license examination passage rates calculated pursuant to Article 16 of the Act, which is a violation of Section 94910(c).

d. The SPFS did not include Placement Rate information, as required by Section 94910(b) and Regulation 74112(e)(4).

e. Respondent does not maintain backup documentation for its SPFS that meets the requirements under Regulation 74112(h). The SPFS backup documentation did not include exam passage information, place of employment, position, salary, hours, a description of all attempts to contact each student, as well as the name, email address, phone number, and position or title of the institution's representative who is primarily responsible for obtaining students' completion, placement, licensing, and salary and wage data. The documentation also does not include the date the information was gathered, copies of notes, emails, or letters through which the information was gathered.

f. The backup documentation for the 2013/2014 SPFS did not match the data reported in the 2013/2014 SPFS, which is a violation of Section 94910(a)-(d).

g. Respondent enrolled students without first providing them a SPFS, which is a violation of Sections 94902, 94910, and 94912.

h. Respondent did not document and maintain all of the information necessary to substantiate the performance data reported in its 2014 SPFS, which is a violation of Section 94929.7.

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TWELFTH CAUSE FOR DISCIPLINE

(Failure to Meet Annual Reporting Requirements)

53. Respondent's approval to operate is subject to disciplinary action under Section 94937(a)(2), in that Respondent's Annual Report for 2014 did not contain all of the information required under Sections 94929 and 94934 and Regulations 74110 and 74112. The circumstances of this conduct are as follows:

a. Respondent's 2014 Annual Report did not include information for all of the educational programs offered in the prior calendar year, which is a violation of Section 94934(a) and Regulation 74110(a).

b. Respondent's 2014 Annual Report contained data that did not match the SPFS or SPFS backup documentation.

c. Respondent did not accurately report the completion rate in its 2014 Annual Report, which is a violation of Section 94929(a) and Regulation 74112(d).

d. Respondent did not accurately report placement and license examination passage rates in its 2013 and 2014 Annual Reports, which is a violation of section 94929.5(a) and Regulation 74112(f). The numbers reported in the 2014 Annual Report did not match the numbers reported in the 2014 SPFS.

e. Respondent did not accurately report the license examination passage rates in its 2013 Annual Report, which is a violation of Section 94929.5(a)(2) and Regulation 74112(e) and (f).

f. Respondent did not document and maintain all of the information necessary to substantiate the performance data reported in its 2013 and 2014 Annual Report, which is a violation of Section 94929.7.

g. The financial statements included with Respondent's 2013 and 2014 Annual Reports did not contain balance sheets, which are required under Regulation 74115. This is a violation of Regulation 74110(b).

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THIRTEENTH CAUSE FOR DISCIPLINE

(Failure to Comply With Student Tuition Recovery Fund Requirements)

54. Respondent's approval to operate is subject to disciplinary action under Section 94937(a)(2) and Regulations 76120(a), 76130(b), and 76140(a), in that Respondent did not comply with the requirements for the Student Tuition Recovery Fund (STRF). The circumstances of this conduct are as follows:

a. Respondent's school catalog lists the incorrect amount for STRF charges.

b. Respondent charged students D.D., L.B., and W.S. STRF fees, but they were enrolled after January 1, 2015, and were therefore required to pay a $0.00 STRF Fee per $1,000 of tuition.

c. Respondent did not submit the STRF Fees assessed to students D.D., L.B., and W.S. to the Bureau.

d. Respondent did not maintain all records required for STRF reporting, including student identification number, courses and course cost, amount of STRF collected, quarter in which STRF assessment was submitted to the Bureau, third party payer identifying information, total institutional charges charged and total institutional charges paid.

FOURTEENTH CAUSE FOR DISCIPLINE

(Engaged in Prohibited Business Practice)

55. Respondent's approval to operate is subject to disciplinary action under Sections 94937(a)(2) and 94897(e), in that Respondent advertised on its website that it was accredited by the National Accredited Commission of Career Arts and Sciences (NACCAS) when Respondent was not accredited by NACCAS.

FIFTEENTH CAUSE FOR DISCIPLINE

(Failure to Maintain Adequate Internet Website)

36. Respondent's approval to operate is subject to disciplinary action under Sections 94937(a)(2) and 94913(a)(1), (2), (3), and (5), in that Respondent failed to provide the following items on its website: a current school catalog; the most recent Annual Report submitted to the

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Bureau; a current SPFS for each educational program offered; and a copy of a student brochure that was distributed by Respondent.

PRAYER

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

1. Revoking or suspending the approval to operate issued by the Bureau for Private Postsecondary Education to Rosston School of Hair Design, Institution Code 3600371;

2. Ordering Rosston School of Hair Design to pay the Bureau for Private Postsecondary Education the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,

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

DATED: 8/16/2017

LEEZA RIFREDI
Deputy Bureau Chief
Bureau for Private Postsecondary Education
Department of Consumer Affairs
State of California
Complainant

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