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

12
13 In the Matter of the Statement of Issues
Against:
14 **MONTROSE ACADEMY, MONICA ELSA**
15 **EUREDJIAN**
16 **Application for Renewal of Approval to**
17 **Operate and Offer Educational Programs**
for Non-Accredited Institutions
18 **Institution Code: 86814999**
19 Respondent.
20

Case No. BPPE23-0478

STATEMENT OF ISSUES

21 **PARTIES**

- 22 1. Deborah Cochrane (Complainant) brings this Statement of Issues solely in her official
23 capacity as the Chief of the Bureau for Private Postsecondary Education (Bureau), Department of
24 Consumer Affairs.
- 25 2. On or about May 26, 2020, the Bureau for Private Postsecondary Education received
26 an application for Renewal of Approval to Operate and Offer Educational Programs for Non-
27 Accredited Institutions from Montrose Academy, Monica Elsa Euredjian (Respondent). On or
28 about May 17, 2020, Monica Elsa Euredjian certified under penalty of perjury to the truthfulness

1 of all statements, answers, and representations in the application. The Bureau denied the
2 application on June 7, 2023.

3 **JURISDICTION**

4 3. This Statement of Issues is brought before the Director of the Department of
5 Consumer Affairs (“Director”) for the Bureau, under the authority of the following laws. All
6 section references are to the Business and Professions Code unless otherwise indicated.

7 4. Section 118, subdivision (b), of the Code provides that the suspension, expiration,
8 surrender, cancellation of a license shall not deprive the Board or Director of jurisdiction to
9 proceed with a disciplinary action during the period within which the license may be renewed,
10 restored, reissued or reinstated.

11 5. Section 477 of the Code provides, in pertinent part, that “Board” includes “bureau,”
12 “commission,” “committee,” “department,” “division,” “examining committee,” “program,” and
13 “agency.” “License” includes certificate, registration or other means to engage in a business or
14 profession regulated by the Code.

15 **STATUTORY PROVISIONS**

16 6. Education Code Section 94887 provides:

17 An approval to operate shall be granted only after an applicant has presented sufficient
18 evidence to the bureau, and the bureau has independently verified the information provided
19 by the applicant through site visits or other methods deemed appropriate by the bureau, that
20 the applicant has the capacity to satisfy the minimum operating standards. The bureau shall
21 deny an application for an approval to operate if the application does not satisfy those
standards. The bureau may deny an application for an approval to operate institutions that
would be owned by, have persons in control of, or employ institution managers that had
knowledge of, should have known, or knowingly participated in any conduct that was the
cause for revocation or unmitigated discipline at another institution.

22 7. Education Code Section 94897 provides, in pertinent part:

23 An institution shall not do any of the following:

24 . . .

25 (k) Willfully falsify, destroy, or conceal any document of record while that document of
26 record is required to be maintained by this chapter.

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1 8. Education Code Section 94891 provides, in pertinent part:

2 (a) The bureau shall adopt by regulation the process and procedures whereby an institution
3 may obtain a renewal of an approval to operate.

4 (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.

6 9. Education Code Section 94900.5 provides:

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

9 (a) The educational programs offered by the institution and the curriculum for each.

10 (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.

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

13 **REGULATORY PROVISIONS**

14 10. California Code of Regulations, title 5, section 71710 provides, in pertinent part:

15 (a) In order to meet its mission and objectives, the educational program defined in Section
16 94837 of the Code shall be comprised of a curriculum that includes:

17 (1) Those subject areas that are necessary for a student to achieve the educational
objectives of the educational program in which the student is enrolled;

18 (2) Subject areas and courses or modules that are presented in a logically organized
19 manner or sequence to students;

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

22 (A) A short, descriptive title of the educational program;

23 (B) A statement of educational objectives;

(C) Length of the educational program;

24 (D) Sequence and frequency of lessons or class sessions;

(E) Complete citations of textbooks and other required written materials;

25 (F) Sequential and detailed outline of subject matter to be addressed or a list of skills
to be learned and how those skills are to be measured;

(G) Instructional mode or methods.

26 (4) If degree granting, require research of an appropriate degree that utilizes a library
27 and other learning resources;

28 (5) Specific learning outcomes tied to the sequence of the presentation of the material
to measure the students' learning of the material; and

- 1 (6) Evaluation by duly qualified faculty of those learning outcomes.
- 2 11. California Code of Regulations, title 5, section 71715 provides, in pertinent part:
- 3 (a) Instruction shall be the central focus of the resources and services of the institution.
- 4 (b) The institution shall document that the instruction offered leads to the achievement of
- 5 the learning objectives of each course.
- 6 12. California Code of Regulations, title 5, section 71720 provides, in pertinent part:
- 7 (b) Instructors in an Educational Program Not Leading to a Degree.
- 8 (1) An institution shall employ instructors who possess the academic, experiential and
- 9 professional qualifications to teach, including a minimum of three years of experience,
- 10 education and training in current practices of the subject area they are teaching. If an
- 11 instructor does not possess the required three years of experience, education and training in
- 12 the subject area they are teaching, the institution shall document the qualifications the
- 13 instructor possesses that are equivalent to the minimum qualifications.
- 14 13. California Code of Regulations, title 5, section 71730 provides, in pertinent part:
- 15 ...
- 16 (f) The institution shall employ administrative personnel who have the expertise to ensure
- 17 the achievement of the institution's mission and objectives and the operation of the
- 18 educational programs.
- 19 14. California Code of Regulations, title 5, section 71400.5 provides:
- 20 (a) The inclusion of false or misleading information, or the intentional or negligent
- 21 omission of pertinent information on any application may result in the denial of the
- 22 application or a delay in processing, and may be grounds for action pursuant to Article 18
- 23 of the Act.
- 24 (b) In addition to denying an application pursuant to section 94887 of the Code, the Bureau
- 25 may deny any application based on any act that constitutes grounds for the denial of a
- 26 license under Section 480 of the Business and Professions Code, incorporated herein by
- 27 reference.
- 28 (c) The proceedings under this section shall be conducted in accordance with Chapter 5
- (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government
- Code.
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1 **FIRST CAUSE FOR DENIAL OF APPLICATION**

2 **(Failure to Provide or Demonstrate Instruction that Meets Minimum Operational**
3 **Standards)**

4 15. Respondent’s application is subject to denial under Education Code sections 94887
5 and 94891, in conjunction with California Code of Regulations, title 5, section 71715(a)-(b), in
6 that Respondent failed to provide or demonstrate as required a complete curriculum where
7 instruction is the central focus of the resources and grades, as described in California Code of
8 Regulations, title 5, section 71715.

9 On August 9, 2022, when the Bureau conducted an inspection of Respondent’s facility,
10 Respondent had no curriculum to follow on the premises. Apart from this inspection, the
11 documents separately provided by Respondent upon the Bureau’s request indicate Respondent’s
12 curriculum is only an outline of the course topics for each program. Respondent failed to
13 demonstrate how instruction leads to the achievement of the learning objectives of each course.

14 **SECOND CAUSE FOR DENIAL OF APPLICATION**

15 **(Failure to Provide or Demonstrate Educational Programs that Meet Minimum Operational**
16 **Standards)**

17 16. Respondent’s application is subject to denial under Education Code sections 94887
18 and 94891, in conjunction with California Code of Regulations, title 5, section 71710(a), in that
19 Respondent failed to provide or demonstrate as required educational programs that meet its
20 missions and objectives with a curriculum that includes course or module materials that are
21 designed or organized by duly qualified faculty.

22 **THIRD CAUSE FOR DENIAL OF APPLICATION**

23 **(Failure to Provide or Demonstrate Faculty that Meets Minimum Operational Standards)**

24 17. Respondent’s application is subject to denial under Education Code sections 94887
25 and 94891, in conjunction with California Code of Regulations, title 5, sections 71720(b)(1) and
26 71730(f), in that Respondent failed to provide or demonstrate as required the employment of
27 administrative personnel that meets minimum operational standards.

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1 Specifically, Respondent’s owner and Chief Academic Officer, Monica Euredjian,
2 submitted upon the Bureau’s request a curriculum that was both incomplete and failed to
3 demonstrate that Respondent employs administrative personnel who have the expertise to ensure
4 the achievement of Respondent’s mission and objectives and the operation of its educational
5 programs, or who possess the academic, experiential, and professional qualifications to teach,
6 including a minimum of three years of experience, education, and training in current practices of
7 the subject area they are teaching.

8 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

9 **(Willful Falsification, Destruction, or Concealment of Any Document of Record Required to**
10 **be Maintained by an Institution)**

11 18. Respondent’s application is subject to denial under Education Code sections 94887,
12 94891, and 94897(k), in that Respondent willfully falsified, destroyed, or concealed a document
13 of record required to be maintained by Respondent.

14 Specifically, Respondent’s owner and Chief Academic Officer, Monica Euredjian, was
15 previously employed as the Computer Institute of Technology’s (CIT) Registrar (2011-2012),
16 Campus Director (2013-2014), and Compliance Director (2014-2015). CIT’s approval to operate
17 was revoked by the Bureau effective March 11, 2023. On the resume Euredjian submitted with
18 Respondent’s May 26, 2020 application for the Bureau’s review, Euredjian did not identify her
19 employment history with CIT. Euredjian also did not provide any other written or verbal
20 communication to the Bureau disclosing her employment history with CIT.

21 **FIFTH CAUSE FOR DENIAL OF APPLICATION**

22 **(False or Misleading Information or Intentional or Negligent Omission on Bureau**
23 **Application)**

24 19. Respondent’s application is subject to denial under Education Code sections 94887
25 and 94891, in conjunction with California Code of Regulations, title 5, section 71400.5, in that
26 Respondent included false or misleading information, or intentionally or negligently omitted
27 pertinent information on a Bureau application. Complainant refers to, and by this reference
28 incorporates, the allegations set forth in above paragraph 18, as though set forth in full herein.

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SIXTH CAUSE FOR DENIAL OF APPLICATION

(Failure to Maintain Complete and Accurate Records)

20. Respondent’s application is subject to denial under Education Code sections 94887, 94891, and 94900.5, in that Respondent failed to maintain complete and accurate records as required. Respondent did not provide or maintain records of curriculum for each educational program offered by the institution. Additionally, Complainant refers to, and by this reference incorporates, the allegations set forth in above paragraph 18, as though set forth in full herein.

PRAYER

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

- 1. Denying the application of Montrose Academy, Monica Elsa Euredjian for a Renewal of Approval to Operate and Offer Educational Programs for Non-Accredited Institutions;
- 2. Taking such other and further action as deemed necessary and proper.

DATED: 1/29/2024

Deborah Cochrane

DEBORAH COCHRANE
Chief
Bureau for Private Postsecondary
Education
Department of Consumer Affairs
State of California
Complainant

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