



## NOTICE TO COMPLY

CA-40231841-04222026

Institution Name:	Phlebotomy Training Academy	Institution Telephone:	(800) 995-6378
Institution Code:	40231841	Administrator Name:	Kenneth Gravley
Street Address:	220 W. Crest Street Escondido, CA 92025	Inspection Date:	April 22, 2026

The Bureau for Private Postsecondary Education (Bureau) issues this Notice to Comply pursuant to California Education Code (CEC) section 94935 and Title 5 of the California Code of Regulations (5 CCR) section 75010.

California Private Postsecondary Education Act: [https://www.bppe.ca.gov/lawsregs/ppe\\_act.pdf](https://www.bppe.ca.gov/lawsregs/ppe_act.pdf)  
 Title 5 of the California Code of Regulations: <https://www.bppe.ca.gov/lawsregs/regs.pdf>

Violation	Code Section Violated	Description of the violation and required correction.
1	5 CCR § 71810 (b)(10) in conjunction with 5 CCR § 71740 (b)	<p><b>Violation Description:</b> Although page 4 of the institution’s 2026 catalog states the institution does not have a library on campus, the catalog failed to include a description of other learning resources needed to support the programs the institution offers as required by 5 CCR § 71740 (b).</p> <p><b>Correction:</b> The institution shall update its current catalog to include the above-mentioned information, pursuant to 5 CCR § 71740 (b) and 5 CCR §71810 (b)(10).</p>
2	5 CCR § 71810 (b)(4)(A)	<p><b>Violation Description:</b> Although page 8 of the institution’s 2026 catalog states, proficiency in the English language is a requirement for admission and identifies requirements for student who speak English as a second language, the catalog failed to identify the level of English language proficiency required of all students and documentation needed to identify English language proficiency.</p>

Violation	Code Section Violated	Description of the violation and required correction.
		<p><b>Correction:</b> The institution shall update its current catalog to include the above-mentioned information, pursuant 5 CCR § 71810 (b)(4)(A).</p>
3	5 CCR § 71810 (b)(15) in conjunction with 5 CCR § 71930 (b)(1)	<p><b>Violation Description:</b> Although page 13 of the institution’s 2026 catalog states, transcript will be kept permanently, the institution identified a retention time frame that does not comply with the Bureau’s requirements. According to 5 CCR § 71930 (b)(1), “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.”</p> <p><b>Correction:</b> The institution shall update the retention time line in its current catalog to comply with 5 CCR § 71930 (b)(1), pursuant 5 CCR § 71810 (b)(15).</p>
4	CEC § 94911 (e)(2) in conjunction with CEC § 94920 (d) and 5 CCR § 71751 (a)(3)(A)(B)(C)(D)	<p><b>Violation Description:</b> The institution’s enrollment agreement template, failed to contain refund policies for the return of unearned institutional charges if the student cancels an enrollment agreement or withdraws during a period of attendance, refund policies for students who have completed 60 percent or less of the period of attendance shall be a pro rata refund.</p> <p><b>Correction:</b> The institution shall update the refund policies in its current enrollment agreement template. The refund policies must demonstrate compliance with CEC § 94920 (d) and 5 CCR § 71751 (a)(3)(A)(B)(C)(D), pursuant to CEC § 94911 (e)(2).</p>
5	CEC § 94911 (e)(3)	<p><b>Violation Description:</b> The institution’s enrollment agreement template, failed to include a description of the procedures that a student is required to follow withdraw from the institution.</p> <p><b>Correction:</b> The institution shall update its enrollment agreement to include the above-mentioned information, pursuant CEC § 94911 (e)(3).</p>
6	CEC § 94911 (j)(1)	<p><b>Violation Description:</b> Although page 3 the institution’s enrollment agreement template contains the required verbatim statement, the statement references the “this catalog” rather than “this enrollment agreement.</p>


Violation	Code Section Violated	Description of the violation and required correction.
		<p><b>Correction:</b> The institution shall update the verbatim statement within the current enrollment agreement template to reference “this enrollment agreement”, pursuant to CEC § 94911 (j)(1).</p>
7	CEC § 94911 (d)	<p><b>Violation Description:</b> The institution’s enrollment agreement template, failed to include a clear and conspicuous statement that the enrollment agreement is legally binding when signed by the student and accepted by the institution. This legally binding statement is a separate requirement from CEC § 94911 (k).</p> <p><b>Correction:</b> The institution shall update its current enrollment agreement template to include the above-mentioned information, pursuant CEC § 94911 (d).</p>
8	CEC § 94913 (a)(1)	<p><b>Violation Description:</b> The institution’s website contains a catalog with violations identified in this NTC.</p> <p><b>Correction:</b> Once the institution's catalog has been updated to remedy the violation(s), the institution shall update its website to provide the current/updated institution catalog pursuant to CEC § 94913(a)(1).</p>
9	CEC § 94913 (a)(2)	<p><b>Violation Description:</b> The institution failed to post on its website, a link to the institution’s 2023-2024 School Performance Fact Sheets.</p> <p><b>Correction:</b> The institution shall update its website to include a link to the institution’s 2023-2024 School Performance Fact Sheets, pursuant to CEC § 94913 (a)(2).</p>
10	CEC § 94913 (a)(5)	<p><b>Violation Description:</b> The institution failed to post on its website, a link to the institution’s most recent annual report submitted to the Bureau. According to Bureau records, the most recent annual report submitted is the <a href="#">2023 Annual Report</a>.</p> <p><b>Correction:</b> The institution shall update its website to include a link to the institution’s 2023 Annual Report, pursuant to CEC § 94913 (a)(5).</p>

Pursuant to 5 CCR section 75010(d), the Institution may do either of the following:

- (1) Within 30 days from the date of the inspection, sign and return the notice to comply, declaring under penalty of perjury that the violation was corrected and describing how compliance was achieved; or
- (2) Within 30 days from the date of the inspection, file with the Bureau a written notice of disagreement, specifying the minor violations described in the notice to comply with which the person approved to operate the institution disagrees, and appealing it by requesting an informal office conference. If a written notice of disagreement is not timely filed with the Bureau, the right to appeal is deemed to have been waived.

**Pursuant to CEC section 94935(h), failure to comply with the notice to comply will result in the Bureau taking appropriate administrative enforcement action.**

The Notice to Comply was given to the Institution's owner, person in control, chief academic officer, chief executive officer, chief operating officer, institution director, or any person delegated by any of the aforementioned persons to facilitate the inspection or accept such notice as set forth below.

Notice To Comply Given To Name & Title:	Kenneth Gravley, Owner
Bureau Compliance Analyst Name:	Gema Fider
Bureau Compliance Analyst Signature:	

## NOTICE TO COMPLY DECLARATION

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I declare under penalty of perjury that each violation identified in this Notice to Comply has been corrected and attached with this declaration is evidence to support the correction of each violation identified.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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