BUSINESS AND CONSUMER SERVICES AGENCY • GAVIN NEWSOM, GOVERNOR
DEPARTMENT OF CONSUMER AFFAIRS • BUREAU FOR PRIVATE POSTSECONDARY EDUCATION
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NOTICE TO COMPLY

CU-83940917-10272026

Institution Name:	Underwood University	Institution Telephone:	(770) 831-9500
Street Address:	6131 Orangethorpe Ave. Ste 450 Buena Park, CA 90620	Administrator Name:	Dr. Sungyi Choi
Institution Code:	53555945	School Code:	83940917
Inspection Date:	October 27, 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
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)(1)	**Violation Description:** The institution's 2026-2027 catalog failed to specific beginning and ending dates defining the time period covered by the catalog. **Correction:** The institution shall update its current catalog to include the above-mentioned information, pursuant to 5 CCR § 71810 (b)(1).
2	CEC § 94909 (a)(2)	**Violation Description:** Although page 7 of the institution's 2026-2027 catalog states the institution approved to operate by the Bureau for Private Postsecondary Education (BPPE) and defines the approval to operate, the catalog failed to contain a statement that the institution is a private institution. **Correction:** The institution shall update its current catalog to include a statement that the institution is a private institution, pursuant to CEC § 94909 (a)(2).

Violation	Code Section Violated	Description of the violation and required correction.
3	CEC § 94909 (a)(3)(A)	**Violation Description:** Although page 7 of the institution's 2026-2027 catalog contains the required statement, the statement is missing the bureau's fax number. **Correction:** The institution shall update the statement in its current catalog, to include the bureau's fax number (916) 263-1897, pursuant to CEC § 94909 (a)(3)(A).
4	CEC § 94909 (a)(3)(C)	**Violation Description:** The institution's 2026-2027 catalog is missing the required verbatim statement: "A student or any member of the public may file a complaint about this institution with the Bureau for Private Postsecondary Education by calling (toll-free telephone number) or by completing a complaint form, which can be obtained on the bureau's internet website (internet website address)." **Correction:** The institution shall update its current catalog, to include the above-mentioned verbatim statement with the Bureau's contact information, pursuant to CEC § 94909 (a)(3)(C).
5	CEC § 94909 (a)(3)(D)	**Violation Description:** The institution's 2026-2027 catalog failed to contain the required verbatim statement: "The Office of Student Assistance and Relief is available to support prospective students, current students, or past students of private postsecondary educational institutions in making informed decisions, understanding their rights, and navigating available services and relief options. The office may be reached by calling (888) 370-7589 or by visiting https://www.osar.bppe.ca.gov/." **Correction:** The institution shall update its current catalog to include the above-mentioned statement pursuant to CEC § 94909 (a)(3)(D).
6	CEC § 94909 (a)(5)	**Violation Description:** Pages 16 and 71 of the institution's 2026-2027 catalog, describes the Bachelor of Hospitality and Food Management (BBAHFM) program. However, Bureau records do not list this program as an approved program. **Correction:** The institution must provide proof of the documentation submitted to the Bureau's Licensing Unit

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		requesting approval to add the Bachelor of Hospitality and Food Management program to Bureau records. If the institution has not notified Licensing Unit of the new program, the institution must contact the Licensing Unit at BPPE.Licensing@dca.ca.gov to obtain information and requirements for updating Bureau records.
7	CEC § 94909 (a)(8)(B) in conjunction with CEC § 94920 (d)	**Violation Description:** On page 26 of the institution's 2026-2027 catalog, the institution states, "The amount of a tuition refund is determined on a pro-rata basis, up to 50% completion of the semester days to the student's withdrawal date or the last date of attendance by the student, whichever is later. If the student withdraws after completing 50% of the semester, no tuition refund shall be made." This statement does not align with CEC § 94920 (d), which identifies refund policy for students who have completed 60 percent or less of the period of attendance shall be a pro rata refund. **Correction:** The institution shall update its current catalog, to accurately reflect the correct pro-rata refund percentage for students enrolling through California pursuant to CEC § 94920 (d), a pursuant to CEC § 94909 (a)(8)(B).
8	5 CCR § 71810 (b)(14) in conjunction with CEC § 94907	**Violation Description:** The institution's grievance policy and procedures on page 42 of the 2026-2027 catalog, states "Please note that GNPEC, BPPE, TRACS, and NC-SARA regulations require that the University's internal grievance policies must be followed completely before a student complaint will be considered." This policy does not comply with CEC § 94907. In accordance with CEC § 94907, an institution shall not require a student to invoke an internal institutional dispute procedure before enforcing any contractual or other legal rights or remedies. **Correction:** The institution shall update its grievance procedure policy in the current catalog to comply with CEC 94907, pursuant to 5 CCR § 71810 (b)(14).

Violation	Code Section Violated	Description of the violation and required correction.
9	5 CCR § 71810 (b)(13)(B)	**Violation Description:** The institution's 2026-2027 catalog failed to include housing information including the availability of housing located reasonably near the institution's California facilities and the estimated cost or range of cost for the housing. **Correction:** The institution shall update its current catalog to include the above-mentioned information, pursuant to 5 CCR § 71810 (b)(13)(B).
10	5 CCR § 71800 (d)	**Violation Description:** The institution's enrollment agreement template failed to identify the date the student must exercise his or her right to cancel or withdraw from the enrollment agreement. **Correction:** The institution shall update the current enrollment agreement template to include the above-mentioned information, pursuant to 5 CCR § 71800 (d).
11	CEC § 94911 (b)	**Violation Description:** On page 3 of the institution's enrollment agreement template, the institution failed to identify the student's obligations to the Student Tuition Recovery Fund (STRF) as non-refundable charge. **Correction:** The institution shall update its enrollment agreement template to clearly identify the students' obligations to the Student Tuition Recovery Fund (STRF) fee as non-refundable, pursuant to CEC § 94911 (b).
12	CEC § 94911 (c)	**Violation Description:** On page 3 of the enrollment agreement template, the specific charge is underlined and in capital letters labeled "TOTAL TUITION AND FEES FOR CURRENT PERIOD OF ATTENDANCE" the specific title of charge is not stated verbatim. **Correction:** The institution shall update its enrollment agreement template, to include the following in underline capital letters followed by the relevant charges in bold: "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," pursuant to CEC § 94911 (c).

Violation	Code Section Violated	Description of the violation and required correction.
13	CEC § 94911 (e)(2) in conjunction with CEC § 94920 (d)	**Violation Description:** On page 5 of the institution's enrollment agreement template, the institution states, "The amount of a tuition refund is determined on a pro rata basis, up to 50 % completion of the semester days to the student's last date of attendance. If the student withdraws after completing 50% of the semester, no tuition refund shall be made." This statement does not align with CEC § 94920 (d), which identifies refund policy for students who have completed 60 percent or less of the period of attendance shall be a pro rata refund. **Correction:** The institution shall update its enrollment agreement template, to accurately reflect the correct pro-rata refund percentage for students enrolling through California pursuant to CEC § 94920 (d), a pursuant to CEC § 94911 (e)(2).
14	CEC § 94911 (d)	**Violation Description:** 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. **Correction:** The institution shall update its enrollment agreement template to include the above-mentioned statement, pursuant to CEC § 94911 (d).
15	CEC § 94911 (k)	**Violation Description:** On page 7 of the institution's enrollment agreement template, the required statement was not verbatim and contained alternate verbiage. **Correction:** The institution shall update its enrollment agreement template to include the following verbatim statement: "I understand that this is a legally binding contract. My signature below certifies that I have read, understood, and agreed to my rights and responsibilities, and that the institution's cancellation and refund policies have been clearly explained to me.", pursuant to CEC §94911 (k).
16	CEC § 94897 (j) in conjunction with	**Violation Description:** Page 3 of the institution's enrollment agreement template includes the misleading

Violation	Code Section Violated	Description of the violation and required correction.
	CEC § 94840	statement: “and does not indicate a contractual agreement of any kind.” This contradicts CEC § 94840, which defines an enrollment agreement as a written contract between a student and an institution for an educational program. **Correction:** The institution must remove this misleading statement from its enrollment agreement template to comply with CEC § 94840, pursuant to CEC § 94897 (j).
17	CEC § 94913 (a)(1)	**Violation Description:** The institution’s website contains a catalog with violations identified in this NTC. **Correction:** 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).
18	5 CCR § 74117 in conjunction with CEC § 94913 (a)(2)(3)(4)(5)	**Violation Description:** The institution’s homepage (https://underwood.edu/), failed to contain clear and conspicuous links to the institution’s current school performance fact sheet, current student brochures offered by the institution, a link to the bureau’s website, and the institution's most recent annual report submitted to the bureau. **Correction:** The institution shall update its homepage (https://underwood.edu/), to include clear and conspicuous links to the school performance fact sheet, link to the bureau’s internet website, and a link to the school’s most recent annual report submitted to the bureau. As an alternate solution, the institution may include a “Consumer Resource” link on the institution’s homepage (https://underwood.edu/) that when clicked, opens to all the items required in Section 94913(a) of the code, pursuant to 5 CCR § 74117.
19	CEC § 94907	**Violation Description:** The institution’s grievance policy on the institution’s website (https://underwood.edu/grievance-policy/) states, “Please note that GNPEC, BPPE, TRACS, and NC-SARA regulations require that the University’s internal grievance policies must be followed completely before a student complaint will be considered.” This policy does not comply with CEC § 94907. In accordance with CEC §

Violation	Code Section Violated	Description of the violation and required correction.
		94907, an institution shall not require a student to invoke an internal institutional dispute procedure before enforcing any contractual or other legal rights or remedies. **Correction:** The institution shall update its grievance policy on its website to comply with CEC 94907.
20	5 CCR § 71920 (b)(5)(E)	**Violation Description:** The institution's transcript failed to contain the Buena Park address, website address, and telephone number of the institution. **Correction:** The institution shall update its transcript template to include the Buena Park address, website address, and telephone number of the institution, pursuant to 5 CCR § 71920 (b)(5)(E).
21	5 CCR §76140 (a)(8)(13)	**Violation Description:** The institution's 2026 1st and 2nd Quarter STRF supporting documentation failed to contain record of the students: (8) course costs, (13) Total institutional charges paid. **Correction:** The institution shall update the 2026 1st and 2nd Quarter STRF supporting documentation to include the above data points, pursuant to 5 CCR § 76140 (a)(8)(13).

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:	Dr. Sungyi Choi, Director of OC Campus, CAO for LA and OC Campus
Bureau Compliance Analyst Name:	Gema Fider
Bureau Compliance Analyst Signature:	

NOTICE TO COMPLY DECLARATION

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Inspection Date:	October 27, 2026		

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