BUSINESS AND CONSUMER SERVICES AGENCY • GAVIN NEWSOM, GOVERNOR
DEPARTMENT OF CONSUMER AFFAIRS • BUREAU FOR PRIVATE POSTSECONDARY EDUCATION
1747 N. Market Blvd., Suite 225, Sacramento, CA 95834
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MODIFIED CITATION ORDER

Citation Issued To: Converse International School of Languages-San Diego (CISL San Diego) (formerly known as Converse International School of Languages - San Diego and Converse International School of Languages) 636 Broadway, Suite 210 San Diego, CA 92101 **Institution Code:** 3709221	**Citation Number:** 26270035 **Total Fine Amount:** **$4,500.00** **Order of Abatement Included:** Yes

Elizabeth Elias issues this modified citation in her official capacity as Bureau Chief at the Bureau for Private Postsecondary Education, California Department of Consumer Affairs (hereinafter referred to as the "Bureau").

LICENSING HISTORY

1. On or about January 28, 2026, the Bureau renewed an Approval to Operate an Accredited Private Postsecondary Institution, Institution Code 3709221, to Converse International School of Languages-San Diego (CISL San Diego) (formerly known as Converse International School of Languages - San Diego and Converse International School of Languages), hereinafter referred to as the "Institution." This Approval to Operate will expire on or about December 31, 2034, unless renewed.

DISCIPLINE HISTORY

2. The Institution has the following discipline history:
   - Citation No. 1415056, issued on June 1, 2015
     - Evidence of compliance; citation satisfied September 16, 2015
   - Modified Citation No. 1920021, issued on August 20, 2019
     - Evidence of compliance; citation satisfied October 18, 2019
   - Modified Citation No. 2021086, issued on October 28, 2020
     - Evidence of compliance; citation satisfied December 2, 2020

CITATION JURISDICTION

3. This administrative citation is issued to the Institution pursuant to California Education Code (CEC) section 94936; and Title 5 of the California Code of Regulations (5 CCR) section 75020 et seq. for the violation(s) described below.

CITATION HISTORY

4. On or about August 27, 2026, the Bureau issued Citation No. 26270035. On or about September 8, 2026, the Bureau received an appeal with a request for an informal conference. The informal conference was held on October 14, 2026. New substantive information was presented during the informal conference; therefore, the Bureau modifies the citation as follows:

CAUSE FOR CITATION & MODIFIED ASSESSMENT OF FINE AND/OR ORDER OF ABATEMENT

5. The Institution is in violation of the following Bureau laws and regulations:

Violation #1: **CEC section 94902(a) – General Enrollment Requirements and 5 CCR section 71920(b)(3) – Student Records**
Cause for Citation: On or about October 23, 2025, the Bureau conducted an unannounced compliance inspection pursuant to CEC section 94932.5(a). Bureau staff reviewed seven student files and found that one student file contained an enrollment agreement that was not fully executed. The enrollment agreement did not contain a signature from the student, a general enrollment requirement.
Administrative Fine: Pursuant to 5 CCR section 75030, the Bureau has determined this to be a "Class A" violation. The Institution is issued a fine of $2,501.00. **Administrative Fine: Modified. The Bureau modifies the administrative fine from $2,501.00 to $1,500.00. The Bureau modifies the violation from a "Class A" violation to "Class B" violation.**

Order of Abatement: Pursuant to 5 CCR section 75020, the Bureau issues the following order of abatement:

The Bureau orders the Institution to ensure all student records follow the law pursuant to CEC section 94902 and 5 CCR section 71920. The Institution must submit a statement of attestation that it has corrected the violation and will ensure that all student records contain signed enrollment agreements. The statement of attestation must be signed and dated by an authorized representative of the Institution.

Order of Abatement: Affirmed.

Violation #2:

5 CCR section 76120(a) – Amount of STRF Assessment, 5 CCR section 76130(a)(1) – Collection and Submission of STRF Assessments, and CEC section 94897(j) – Prohibited Business Practices

Cause for Citation: On or about October 23, 2025, the Bureau conducted an unannounced compliance inspection pursuant to CEC section 94932.5(a). Bureau staff requested to review the Institution's Student Tuition Recovery Fund (STRF) substantiating data for the 4th quarter reporting period of 2024 and the 1st quarter reporting period of 2025. Bureau staff determined that the Institution reported zero students as eligible for the STRF and stated in its enrollment agreement that the Institution does not participate in STRF. Because the Institution offers only in-person programs, all enrolled students are STRF eligible and required by law. Therefore, the Institution failed to properly document STRF eligibility for each student who is a California resident or enrolled in a residency program.

Furthermore, the Bureau determined the Institution made a untrue or misleading statement to students related to STRF participation in its enrollment agreement.

Administrative Fine: Pursuant to 5 CCR section 75030, the Bureau has determined this to be a "Class A" violation. The Institution is issued a fine of $2,501.00.

Administrative Fine: Modified. The Bureau modifies the administrative fine from $2,501.00 to $1,500.00. The Bureau modifies the violation from a "Class A" violation to "Class B" violation.

Order of Abatement: Pursuant to 5 CCR section 75020, the Bureau issues the following order of abatement:

The Institution shall revise and resubmit the STRF Assessment Reporting Forms for the third and fourth quarters of 2023, along with the corrected remittance of STRF funds (if applicable). Additionally, the Institution shall submit a signed and dated statement of attestation, from an authorized representative, confirming that the violation has been corrected.

Order of Abatement: Affirmed.

Violation #3:

5 CCR section 74112(m)(1-9) - Uniform Data – Annual Report, Performance Fact Sheet and 5 CCR section 71930(e) – Maintenance of Records

Cause for Citation: On or about October 23, 2025, the Bureau conducted an unannounced compliance inspection pursuant to CEC section 94932.5(a). Bureau staff requested documentation supporting data reported on the Institutions 2022/2023 School Performance Fact Sheet (SPFS). Bureau staff determined the Institution's supporting documentation for 2022/2023 failed to include all points pursuant to 5 CCR section 74112.

Bureau staff found that the Institution failed to collect and/or maintain some of the required data points for 2022, specifically subsection (m)(2):

- (m)(2) - student program completed, program start date, scheduled completion date, and actual completion dates

Bureau staff also found that the Institution failed to collect and/or maintain some of the required data points for 2023, specifically subsections (m)(1) and (m)(3-9):

- (m)(1) - the list of job classifications determined to be considered gainful employment for the educational program;

- (m)(3) - graduate's place of employment and position, date employment began, date employment ended, if applicable, actual salary, hours per week, and the date employment was verified;

- (m)(4) - for each employer from which employment or salary information was obtained, the employer name(s) address and general phone number, the contact person at the employer and the contact's phone number and email address, and all written communication with employer verifying student's employment or salary;

- (m)(5) - for students who become self-employed, all documentation necessary to demonstrate self-employment;

- (m)(6) - a description of all attempts to contact each student. or employer;

- (m)(7) - a description of all attempts to contact each student. or employer;

- (m)(8) - for each student determined to be unavailable for graduation or unavailable for employment, the identity of the student, the type of unavailability, the dates of unavailability, and the documentation of the unavailability; and

- (m)(9) - the name, email address, phone number, and position or title of the institution's representative who was 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.

Administrative Fine: Pursuant to 5 CCR section 75030, the Bureau has determined this to be a "Class A" violation. The Institution is issued a fine of $2,501.00.

Administrative Fine: Modified. The Bureau modifies the administrative fine from $2,501.00.00 to $1,500.00. The Bureau modifies the violation from a "Class A" violation to "Class B" violation.

Order of Abatement: Pursuant to 5 CCR section 75020, the Bureau issues the following order of abatement:

The Bureau orders the Institution to correct the violation by providing an electronic copy of the template used by the Institution to document supporting data for SPFS, for the Bureau to verify the Institution is collecting the required data points pursuant to 5 CCR section 74112.

In addition, the Institution must submit a statement of attestation it has corrected the violation and will ensure that the supporting data for SPFS is maintained and immediately available during an inspection. The statement of attestation must be dated and signed by an authorized representative of the Institution.

Order of Abatement: Affirmed.

COMPLIANCE WITH ORDER OF ABATEMENT

6. In accordance with the provisions of CEC section 94936 and 5 CCR sections 75020 and 75040, the Bureau issues the order(s) of abatement described above. Evidence of compliance with the order of abatement must be submitted to the Bureau within 30 days from the date of issuance of this modified citation. Evidence of compliance with the order of abatement may sent by mail or email to:

   - Mail: Bureau for Private Postsecondary Education
     Attn: Discipline Unit – Aurzella Izmarai-Karimi
     1747 North Market, Blvd., Suite 225
     Sacramento, CA 95834
   - Email: bppe.discipline@dca.ca.gov
     - In the subject line, please include the Institution name and citation number.

COMPLIANCE WITH ASSESSMENT OF FINE

7. In accordance with the provisions of CEC section 94936, and 5 CCR section 75020 et seq., the Bureau hereby orders this assessment of fines in the total amount of $4,500.00 for the violations described above. Payment of the fines must be made to the Bureau within 30 days from the date of service of this modified citation. To assist the Bureau in processing the payment of fines, please submit the enclosed *Payment of Fine – Waiver of Appeal* form.

Payment must be sent to the Bureau by mail at:

- Bureau for Private Postsecondary Education
  Attn: Discipline Unit – Aurzella Izmarai-Karimi
  1747 North Market, Blvd., Suite 225
  Sacramento, CA 95834

NOTICE OF APPEAL RIGHTS

8. Pursuant to 5 CCR section 75040(d), the modified decision is considered final, unless a request for a hearing was filed timely.

   If the Institution requested a hearing and no longer chooses to proceed with the hearing, the Institution may request to withdraw the request for a hearing.

COMPLIANCE WITH FINE AND/OR ORDER OR ABATEMENT DISCLOSURE

9. Pursuant to 5 CCR section 75050, payment of the fine and/or compliance with any order of abatement does not constitute an admission of the violation charged and shall be represented as satisfactory resolution of the matter for the purposes of public disclosure.

   Pursuant to 5 CCR section 75050, failure to comply with this citation order, its order of abatement, and/or administrative fine by the required due date is grounds for denial or discipline of an approval to operate. Where a citation is not contested and fine is not paid, the full amount of the assessed fine shall be added to the fee for renewal of the approval to operate. An approval to operate shall not be renewed without payment of the renewal fee and fine. The Bureau may also enforce the administrative fine as if it were a money judgment pursuant to CEC section 94936.

BUREAU CONTACT INFORMATION

10. If you have any questions regarding this Citation, please contact Aurzella Izmarai-Karimi, Citation Analyst by email at Aurzella.Izmarai@dca.ca.gov or by phone at (916) 574-7344.

"Original Signature on File" 10/26/2026

Elizabeth Elias
Bureau Chief

Citation Date of Issuance

Enclosures:

- Payment of Fine
- Withdrawal of Request for Administrative Hearing
- Declaration of Service by Certified and First-Class Mail