



Bureau for Private Postsecondary Education
 2535 Capitol Oaks Drive, Suite 400, Sacramento, CA 95833
 P.O. Box 980818, West Sacramento, CA 95798-0818
 P (916) 431-6959 F (916) 263-1897 www.bppe.ca.gov



NOTICE TO COMPLY – CU 3805791 0418 (Ed. Code § 94935, 5, CCR § 75010)

Institution Name:	Transworld Schools	Institution Telephone:	415-928-2835
Institution Code:	3805791	Administrator Name:	Ceri Rich-Odeh
Street Address:	551 Sutter Street San Francisco, CA 94102	Date of Inspection:	4/3/18

Nature and Facts of the Violation(s), Including a Reference to the Statute or Regulation Violated, and Manner in Which the Institution Must Correct the Violation to Achieve Compliance:

STUDENT TUITION RECOVERY FUND

	Education Code (CEC) or Code of Regulations (5, CCR)	Subsection, Description, and Required Correction
1	5, CCR §76130. Collection and Submission of Assessment	<p>(b) 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:</p> <ul style="list-style-type: none"> (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. <p>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.</p> <p>The institution did not provide the Bureau their Fourth Quarter 2017 Student Tuition Recovery Fund (STRF) Assessment Reporting Form (blank form attached).</p> <p>To remedy this violation, the institution shall provide their completed Fourth Quarter 2017 STRF Assessment Reporting Form. The form shall report the students enrolled in the quarter who were or were not eligible for STRF upon enrollment. To document compliance, the institution shall send the completed form to the Bureau’s Administration Unit, and submit a copy of the completed form with the institution’s NTC response.</p> <p>Documentation of compliance shall be submitted with the institution’s response to the NTC and the last page of this document by Thursday, May 3, 2018.</p>

Notice to Comply – CU 3805791 0418

Inspector’s Initial: *MW*
 Administrator’s Initial: *CR*

INSTITUTIONAL WEBSITE AND ADVERTISEMENTS

	Education Code (CEC) or Code of Regulations (5, CCR)	Subsection, Description, and Required Correction
2	CEC §94913. Institutional Web Site Requirements	<p>(a) An institution that maintains an Internet Web site shall provide on that Internet Web site all of the following: (1) The school catalog.</p> <p>The institution’s website does not contain a current updated school catalog.</p> <p>To remedy the violation, the institution’s website shall be updated to contain the updated and corrected 2017 school catalog. To document compliance, the institution shall provide a weblink to the updated catalog. In addition, the weblink shall be updated with a resubmitted Annual Report.</p> <p>Documentation of compliance shall be submitted with the institution’s response to the NTC and the last page of this document by Thursday, May 3, 2018.</p>
3	CEC §94913. Institutional Web Site Requirements	<p>(a) An institution that maintains an Internet Web site shall provide on that Internet Web site all of the following: (2) A School Performance Fact Sheet for each educational program offered by the institution.</p> <p>The institution’s website does not contain 2015/2016 School Performance Fact Sheets (SPFS) for each educational program. The website failed to contain a SPFS for the currently approved programs:</p> <ul style="list-style-type: none"> • Business English (432 Hours) • Intensive English (2448 Hours) • Study Abroad Semester (20 Weeks, 2448 Hours) • Study Abroad Year (30 Weeks, 2448 Hours) • TOEFL Preparation (288 Hours) <p>5, CCR §74112(a) requires an individual SPFS for each program.</p> <p>To remedy the violation, the institution’s website shall be updated to contain the updated and corrected 2015/2016 SPFS for each educational program offered at each institution. To document compliance, the institution shall provide a weblink to the SPFS for each educational program. In addition, the weblinks shall be updated with a resubmitted Annual Report.</p> <p>Documentation of compliance shall be submitted with the institution’s response to the NTC and the last page of this document by Thursday, May 3, 2018.</p>
4	CEC §94913. Institutional Web Site Requirements	<p>(a) An institution that maintains an Internet Web site shall provide on that Internet Web site all of the following: (3) Student brochures offered by the institution.</p>

Notice to Comply – CU 3805791 0418
 Inspector’s Initial: *MW*
 Administrator’s Initial: *cnl*

		<p>The institution's website does not contain documentation of student brochures offered by the institution. However, the institution offers brochures for each program.</p> <p>To remedy the violation, the institution's website shall be updated to include student brochures offered by the institution. To document compliance, the institution shall provide a weblink to the brochures offered by the institution.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document by Thursday, May 3, 2018.</p>
5	<p>CEC §94913. Institutional Web Site Requirements</p>	<p>(a) An institution that maintains an Internet Web site shall provide on that Internet Web site all of the following: (4) A link to the bureau's Internet Web site.</p> <p>The institution's website failed to contain a link to the Bureau's internet website (www.bppe.ca.gov).</p> <p>To remedy the violation, the institution's website shall be updated to include a link to the bureau's Internet Web site on the institution's homepage, pursuant to 5, CCR §74117. To document compliance, the institution shall provide a weblink to the webpage containing the link to the Bureau's internet website.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document by Thursday, May 3, 2018.</p>
6	<p>CEC §94913. Institutional Web Site Requirements</p>	<p>(b) An institution shall include information concerning where students may access the bureau's Internet Web site anywhere the institution identifies itself as being approved by the bureau.</p> <p>The homepage of the institution's website states the institution is approved by the State of California, and the "About Us" page states the institution is approved by the Bureau for Private Postsecondary; however, neither page includes information concerning where students may access the Bureau's website.</p> <p>To remedy this violation, the institution's website shall include information concerning where students may access the Bureau's website anywhere the institution states it is approved by the Bureau. To document compliance the institution shall provide a print out and weblink to the webpage with the necessary corrections.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document by Thursday, May 3, 2018.</p>
7	<p>5, CCR §74117. Website Requirements.</p>	<p>In addition to the requirement in Section 94913(b) of the Code, an institution that maintains a website shall provide on the homepage of that website clear and conspicuous links to all the items required in Section 94913(a) of the Code.</p>

Notice to Comply – CU 3805791 0418

Inspector's Initial: *MW*

Administrator's Initial: *CW*

		<p>The homepage of the institution's website does not contain links to the catalog, SPFS's, brochures, a link to the Bureau's website, or the most recent annual report submitted to the Bureau.</p> <p>To remedy this violation, the homepage of the institution's website shall be updated to contain links to the catalog, SPFS's, brochures, a link to the Bureau's website, or the most recent annual report submitted to the Bureau. To document compliance, the institution shall provide the weblinks found on the institution's homepage and a printout of the homepage of the institution's website, showing the links posted.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document by Thursday, May 3, 2018.</p>
8	<p>5, CCR §71750. Withdrawals and Refunds.</p>	<p>(b) An institution may not enforce any refund policy that is not specified in the catalog as required pursuant to section 94909(a)(8)(B) of the Code, and must refund all institutional charges upon a student's withdrawal. Withdrawal policy procedures pursuant to section 94909(a)(8)(B) of the Code shall include, at a minimum: the acceptable methods of delivery of a notice to withdraw; whether withdrawal can be accomplished by conduct, and if so, how; the position or positions to whom the notice to withdraw must be delivered; and the date that the notice to withdraw is considered effective, which shall be no later than the date received by the institution.</p> <p>The "Terms of Service" page of the institution's website identified a cancellation refund policy which was not consistent with the cancellation refund policy identified in the institution's catalog.</p> <p>To remedy this violation, the "Terms of Service" page of the institution's website shall be updated to contain the cancellation refund policy identified in the institution's catalog. To document compliance, the institution shall submit a printout and weblink of the updated "Terms of Service" with their NTC response.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document by Thursday, May 3, 2018.</p>

SCHOOL CATALOG

	Education Code (CEC) or Code of Regulations (5, CCR)	Subsection, Description, and Required Correction
9	<p>5, CCR §71810. Catalog.</p>	<p>(b) The catalog shall contain the information prescribed by Section 94909 of the Code and all of the following:</p> <p>(2) A statement of the institution's missions and purposes and the objectives underlying each of its educational programs;</p> <p>(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.</p>

Notice to Comply – CU 3805791 0418

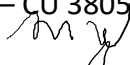

Inspector's Initial: *MW*

Administrator's Initial: *AS*

		<p>The catalog did not contain the objectives underlying each educational program which defined the goals and methods by which the institution fulfills its mission and transforms it into measurable student learning outcomes.</p> <p>To correct this violation, the institution’s catalog shall be updated to contain the institution’s mission statement and the goals and methods by which the institution fulfills its mission and transforms it into measurable student learning outcomes for each educational program. To document compliance, the institution shall submit their updated catalog with their NTC response.</p> <p>Documentation of compliance shall be submitted with the institution’s response to the NTC and the last page of this document by Thursday, May 3, 2018.</p>
--	--	--

STUDENT RECORDS

	Education Code or Code of Regulations	Subsection, Description, and Required Correction
10	CEC §94900. Required Student Records	<p>(b) An institution shall maintain, for each student granted a degree or certificate by that institution, permanent records of all of the following:</p> <p>(1) The degree or certificate granted and the date on which that degree or certificate was granted.</p> <p>The institution did not maintain a permanent record (transcript) containing the certificate awarded and the date on which that certificate was granted.</p> <p>To remedy this violation and document compliance, the institution shall submit a transcript template containing the certificate awarded and the date on which that certificate was granted.</p> <p>Documentation of compliance shall be submitted with the institution’s response to the NTC and the last page of this document by Thursday, May 3, 2018.</p>
11	5, CCR §71920. Student Records.	<p>(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:</p> <p>(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:</p> <p>(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.</p> <p>The institution did not maintain student records which contained verification of high school completion or equivalency or other documentation establishing the</p>

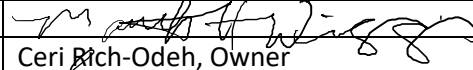

Notice to Comply – CU 3805791 0418
 Inspector’s Initial: 
 Administrator’s Initial: 

		<p>student's ability to do college level work. Student files did not contain a copy of a recognized high school diploma, GED certificate or equivalent, or results from an ability-to-benefit examination. The institution's admissions policy outlined in the catalog stated students enrolled shall have a BA Degree, a high school diploma, a California High School Proficiency Exam (CHSPE) certificate (or equivalent for other states), or a General Educational Development (GED) certificate.</p> <p>To remedy this violation, the institution shall submit with their NTC response documentation of an established policy and procedure explaining the institution collects documentation of verification of high school completion or equivalency or other documentation establishing the student's ability to do college level work, which may include: a copy of a recognized high school diploma, GED certificate or equivalent, or results from an ability-to-benefit examination. To document compliance, the institution shall submit their written policy and procedure with their NTC response.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document by Thursday, May 3, 2018.</p>
12	<p>5, CCR §71920. Student Records.</p> <p>CEC §94902. General Enrollment Requirements.</p> <p>CEC §94912. Signature, Initials Required</p>	<p>(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:</p> <p>(3) Copies of all documents signed by the student, including contracts, instruments of indebtedness, and documents relating to financial aid.</p> <p>(b) An enrollment agreement is not enforceable unless all of the following requirements are met:</p> <p>(3) Prior to the execution of the enrollment agreement, the student and the institution have signed and dated the information required to be disclosed in the Student Performance Fact Sheet pursuant to subdivisions (a) to (d), inclusive, of Section 94910. Each of these items in the Student Performance Fact Sheet shall include a line for the student to initial and shall be initialed and dated by the student.</p> <p>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.</p> <p>Student records maintained by the institution did not contain a signed Performance Fact Sheet pursuant to CEC §94902(b)(3) and §94912.</p>

		<p>CEC §94902(b)(3) states, "Prior to the execution of the enrollment agreement, the student and the institution have signed and dated the information required to be disclosed in the Student Performance Fact Sheet pursuant to subdivisions (a) to (d), inclusive, of Section 94910. Each of these items in the Student Performance Fact Sheet shall include a line for the student to initial and shall be initialed and dated by the student."</p> <p>CEC §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."</p> <p>In addition, some student files failed to contain Department of Homeland Security ICE Form I-20 signed by the students.</p> <p>To remedy this violation and document compliance, the institution shall submit with their NTC response, documentation of an established policy and procedure requiring all documents signed by the student to be placed and maintained in the student's file.</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document by Thursday, May 3, 2018.</p>
13	<p>5, CCR §71920. Student Records.</p>	<p>(b) In addition to the requirements of section 94900, the file shall contain all of the following pertinent student records:</p> <p>(10) A document specifying the amount of a refund, including the amount refunded for tuition and the amount for other itemized charges, the method of calculating the refund, the date the refund was made, and the name and address of the person or entity to which the refund was sent.</p> <p>The institution did not maintain withdrawn student files which contain a document specifying the amount of refund obligated to the student, including the amount refunded for tuition and other itemized charges, the method of calculating the refund, and the date the refund was made, and the name and address of the person or entity to which the refund was sent.</p> <p>To remedy this violation, the institution shall provide with their NTC response documentation of the institution's established policy and procedure for maintaining that documentation in each withdrawn student's file. The policy and procedure shall indicate each withdrawn will contain a document specifying the amount of refund obligated to the student, including the amount refunded for tuition and other itemized charges, the method of calculating the refund,</p>

		<p>and the date the refund was made, and the name and address of the person or entity to which the refund was sent</p> <p>Documentation of compliance shall be submitted with the institution's response to the NTC and the last page of this document by Thursday, May 3, 2018.</p>
--	--	--

Only minor violations are listed on this Notice to Comply.

Inspector's Name	Matthew Wiggins
Inspector's Signature	
Institution Administrator Name/Title:	Ceri Rich-Odeh, Owner
Institution Administrator's Signature:	

Education Code can be located at: http://www.bppe.ca.gov/lawsregs/ppe_act.shtml

Code of Regulations can be located at: <http://www.bppe.ca.gov/lawsregs/regs.shtml>

Notice to Comply – CU 3805791 0418

Inspector's Initial: 

Administrator's Initial: 

RETURN THIS FORM BY MAY 3, 2018 WITH EITHER: 1) VERIFICATION OF COMPLIANCE OR 2) A NOTICE OF DISAGREEMENT

IMPORTANT COMPLIANCE NOTICE

California Education Code §94935 and California Code of Regulations §75010 provide that the Bureau for Private Postsecondary Education (Bureau) shall issue a Notice to Comply for minor violations detected during a compliance inspection by the Bureau.

By no later than 30 days from the date of the inspection, you must either: 1) Remedy the noncompliance item(s), sign the below declaration and submit this form to the Bureau, along with documentation describing how compliance was achieved; or 2) File with the Bureau a written notice of disagreement, specifying the minor violation(s) described in the Notice to Comply with which you disagree, 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.

Failure to timely remedy the noncompliance item(s) or file a written request for an informal office conference may result in the Bureau taking administrative enforcement action.

DECLARATION

Attached to this document is a list describing how compliance was achieved for each violation and supporting documentation. I declare under penalty of perjury that all violations identified in this Notice to Comply are corrected as described in the attachment.

Signature

Date

Print Name and Title

THIS DECLARATION OR A NOTICE OF DISAGREEMENT MUST BE SUBMITTED TO THE BUREAU BY **May 3, 2018**.

Notice to Comply – CU 3805791 0418
Inspector's Initial: *mm*
Administrator's Initial: *aw*