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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 In the Matter of the Statement of Issues  
Against:

Case No. BPPE24-1088

13 **IPSB SCHOOL OF INTEGRATIVE**  
14 **PSYCHO-STRUCTURAL BODYWORK**

**STATEMENT OF ISSUES**

15 Application for Renewal of Approval to  
Operate and Offer Educational Programs for  
Non-Accredited Institutions

16 Institution Code No. 98908029

17 Respondent.  
18

19 **PARTIES**

20 1. Deborah Cochrane (Complainant) brings this Statement of Issues solely in her official  
21 capacity as the Chief of the Bureau for Private Postsecondary Education, Department of  
22 Consumer Affairs.

23 2. On or about May 20, 2021, the Bureau for Private Postsecondary Education received  
24 an application for a Renewal of Approval to Operate a Non-Accredited Institution from IPSB  
25 School of Integrative Psycho-Structural Bodywork (Respondent), owned by Foundation of Life  
26 Energy, Inc. The application shows two signatures on May 8, 2021, under penalty of perjury for  
27  
28

1 Gary Strauss and Tracy Griffiths to the truthfulness of all statements, answers, and  
2 representations in the application.

3 The Bureau denied the application on September 24, 2024.

### 4 **JURISDICTION**

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

8 4. Code section 94886 states that:

9 Except as exempted in Article 4 (commencing with Section 94874) or in compliance with  
10 the transition provisions in Article 2 (commencing with Section 94802), a person shall not  
11 open, conduct, or do business as a Private Postsecondary Educational Institution in this  
12 State without obtaining an approval to operate under this chapter.

13 5. Code section 94887 states that:

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

### 24 **STATUTORY PROVISIONS**

25 6. Section 94909 of the Education Code states, in pertinent part:

26 Except as provided in subdivision (d), before enrollment, an institution shall provide a  
27 prospective student, either in writing or electronically, with a school catalog  
28 containing, at a minimum, all of the following:

1 The name, address, telephone number, and, if applicable, internet website address of  
2 the institution.

3 ...

4 (4) The address or addresses where class sessions will be held.

5 (5) A description of the programs offered and a description of the instruction  
6 provided in each of the courses offered by the institution, the requirements for  
7 completion of each program, including required courses, any final tests or  
8 examinations, any required internships or externships, and the total number of credit  
9 hours, clock hours, or other increments required for completion.

10 ...

11 (8) A detailed description of institutional policies in the following areas:

12 (A) Admissions policies, including the institution's policies regarding the acceptance  
13 of credits earned at other institutions or through challenge examinations and  
14 achievement tests, and a list describing any transfer or articulation agreements  
15 between the institution and any other college or university that provides for the  
16 transfer of credits earned in the program of instruction. If the institution has not  
17 entered into an articulation or transfer agreement with any other college or university,  
18 the institution shall disclose that fact.

19 (B) Cancellation, withdrawal, and refund policies, including an explanation that the  
20 student has the right to cancel the enrollment agreement and obtain a refund of  
21 charges paid through attendance at the first class session, or the seventh day after  
22 enrollment, whichever is later. The text shall also include a description of the  
23 procedures that a student is required to follow to cancel the enrollment agreement or  
24 withdraw from the institution and obtain a refund consistent with the requirements of  
25 Article 13 (commencing with Section 94919).

26 (9) The schedule of total charges for a period of attendance and an estimated schedule  
27 of total charges for the entire educational program.

28 ...

(c) An institution shall provide the school catalog to any person upon request. In addition, if the institution has student brochures, the institution shall disclose the requested brochures to any interested person upon request.

...

7. Section 94870 of the Education Code states in pertinent part:

“Total charges” means the sum of institutional and noninstitutional charges.

8. Section 94919 of the Education Code states in pertinent part:

(a) An institution that participates in the federal student financial aid programs complies with this article by complying with applicable regulations of the federal student financial aid programs under Title IV of the federal Higher Education Act of 1965.

(b) The institution shall advise each student that a notice of cancellation shall be in writing, and that a withdrawal may be effectuated by the student’s written notice or by the student’s conduct, including, but not necessarily limited to, a student’s lack of attendance.

(c) The institution shall also provide a pro rata refund of nonfederal student financial aid program moneys paid for institutional charges to students who have completed 60 percent or less of the period of attendance.

(d) Institutions shall refund 100 percent of the amount paid for institutional charges, less a reasonable deposit or application fee not to exceed two hundred fifty dollars (\$250), if notice of cancellation is made through attendance at the first class session, or the seventh day after enrollment, whichever is later.

9. Section 94920 of the Education Code states in pertinent part:

An institution that does not participate in the federal student financial aid programs shall do all of the following:

(a) The institution shall advise each student that a notice of cancellation shall be in writing, and that a withdrawal may be effectuated by the student’s written notice or

1 by the student's conduct, including, but not necessarily limited to, a student's lack of  
2 attendance.

3 (b) Institutions shall refund 100 percent of the amount paid for institutional charges,  
4 less a reasonable deposit or application fee not to exceed two hundred fifty dollars  
5 (\$250), if notice of cancellation is made through attendance at the first class session,  
6 or the seventh day after enrollment, whichever is later.

7 (c) The bureau may adopt by regulation a different method of calculation for  
8 instruction delivered by other means, including, but not necessarily limited to,  
9 distance education.

10 (d) The institution shall have a refund policy for the return of unearned institutional  
11 charges if the student cancels an enrollment agreement or withdraws during a period  
12 of attendance. The refund policy for students who have completed 60 percent or less  
13 of the period of attendance shall be a pro rata refund.

14 (e) The institution shall pay or credit refunds within 45 days of a student's  
15 cancellation or withdrawal.

16 10. Section 94913 of the Education Code states in pertinent part:

17 An institution that maintains an internet website shall provide on that internet website  
18 the current version of all of the following:

19 (1) The school catalog.

20 (2) A School Performance Fact Sheet for each educational program offered by the  
21 institution.

22 (3) Student brochures offered by the institution.

23 (4) A link to the bureau's internet website.

24 (5) The institution's most recent annual report submitted to the bureau.

25 (b) An institution shall include information concerning where students may access the  
26 bureau's internet website anywhere the institution identifies itself as being approved  
27 by the bureau.

28 11. Section 94910 of the Education Code states in pertinent part:

1 Except as provided in subdivision (d) of Section 94909 and Section 94910.5, prior to  
2 enrollment, an institution shall provide a prospective student with a School  
3 Performance Fact Sheet containing, at a minimum, the following information, as it  
4 relates to the educational program:

5 (a) Completion rates, as calculated pursuant to Article 16 (commencing with Section  
6 94928).

7 (b) Placement rates for each educational program, as calculated pursuant to Article 16  
8 (commencing with Section 94928), if the educational program is designed to lead to,  
9 or the institution makes any express or implied claim related to preparing students for,  
10 a recognized career, occupation, vocation, job, or job title.

11 (c) License examination passage rates for programs leading to employment for which  
12 passage of a state licensing examination is required, as calculated pursuant to Article  
13 16 (commencing with Section 94928).

14 (d) Salary or wage information, as calculated pursuant to Article 16 (commencing  
15 with Section 94928).

16 (e) If a program is too new to provide data for any of the categories listed in this  
17 subdivision, the institution shall state on its fact sheet: "This program is new.  
18 Therefore, the number of students who graduate, the number of students who are  
19 placed, or the starting salary you can earn after finishing the educational program are  
20 unknown at this time. Information regarding general salary and placement statistics  
21 may be available from government sources or from the institution, but is not  
22 equivalent to actual performance data."

23 (f) All of the following:

24 (1) A description of the manner in which the figures described in subdivisions (a) to  
25 (d), inclusive, are calculated or a statement informing the reader of where they may  
26 obtain a description of the manner in which the figures described in subdivisions (a)  
27 to (d), inclusive, are calculated.

28 (2) A statement informing the reader of where they may obtain from the institution a

list of the employment positions determined to be within the field for which a student received education and training for the calculation of job placement rates as required by subdivision (b).

(3) A statement informing the reader of where they may obtain from the institution a list of the objective sources of information used to substantiate the salary disclosure as required by subdivision (d).

(g) The following statements:

(1) "This fact sheet is filed with the Bureau for Private Postsecondary Education. Regardless of any information you may have relating to completion rates, placement rates, starting salaries, or license exam passage rates, this fact sheet contains the information as calculated pursuant to state law."

(2) "Any questions a student may have regarding this fact sheet that have not been satisfactorily answered by the institution may be directed to the Bureau for Private Postsecondary Education at (address), Sacramento, CA (ZIP Code), (internet website), (telephone and fax numbers)."

(h) If the institution participates in federal financial aid programs, the most recent three-year cohort default rate reported by the United States Department of Education for the institution and the percentage of enrolled students receiving federal student loans.

(i) Data and information disclosed pursuant to subdivisions (a) to (d), inclusive, is not required to include students who satisfy the qualifications specified in subdivision (d) of Section 94909, but an institution shall disclose whether the data, information, or both provided in its fact sheet excludes students pursuant to this subdivision. An institution shall not actively use data specific to the fact sheet in its recruitment materials or other recruitment efforts of students who are not California residents and do not reside in California at the time of their enrollment.

12. Section 94897 of the Education Code states in pertinent part:

(i) Use a name in any manner improperly implying any of the following:

(1) The institution is affiliated with any government agency, public or private corporation, agency, or association if it is not, in fact, thus affiliated.

### **REGULATORY PROVISIONS**

13. Title 5, Section 71475 of the California Code of Regulations states, in pertinent part:

(c) The application for renewal of approval to operate and offer educational programs for non-accredited institutions shall include all of the following:

...

The physical address of the institution's primary administrative location in California.

...

(4) The physical address, phone number and fax number of each campus and branch at which the educational programs will be offered, including the identification of the institution's main location and branch locations.

14. Title 5, Section 71660 of the California Code of Regulations states, in pertinent part:

An institution shall notify the Bureau of a non-substantive change including: change of location of less than 10 miles; addition of a program related to the approved programs offered by the institution; addition of a new branch five miles or less from the main or branch campus; addition of a satellite; and change of mailing address. All such notifications shall be made within 30 days of the change and sent to the Bureau, in writing, to the address listed in section 70020.

...

15. Title 5, Section 74115 of the California Code of Regulations states, in pertinent part:

(a) This section applies to every set of financial statements required to be prepared or filed by the Act or by this chapter.

(b) A set of financial statements shall contain, at a minimum, a balance sheet, an income statement, and a cash flow statement, and the preparation of financial statements, shall comply with all of the following:

(1) Audited and reviewed financial statements shall be conducted and prepared in accordance with the generally accepted accounting principles established by the



American Institute of Certified Public Accountants by an independent certified public accountant who is not an employee, officer, or corporate director or member of the governing board of the institution.

(2) Financial statements prepared on an annual basis as required by section 74110(b) shall be prepared in accordance with the generally accepted accounting principles established by the American Institute of Certified Public Accountants. Nonprofit institutions shall provide annual financial statements as required under generally accepted accounting principles for nonprofit organizations.

(3) The financial statements shall establish that the institution meets the requirements for financial resources required by Section 71745.

(4) If an audit performed to determine compliance with any federal or state student financial aid program reveals any failure to comply with the requirements of the program and the noncompliance creates any liability or potential liability for the institution, the financial statements shall reflect the liability or potential liability.

(5) Any audits shall demonstrate that the accountant obtained an understanding of the institution's internal financial control structure, assessed any risks, and has reported any material deficiencies in the internal controls.

(c) Work papers for the financial statements shall be retained for five years from the date of the statements and shall be made available to the Bureau upon request.

(d) "Current" with respect to financial statements means completed no sooner than 120 days prior to the time it is submitted to the Bureau, and covering no less than the most recent complete fiscal year. If more than 8 months will have elapsed between the close of the most recent complete fiscal year and the time it is submitted, the fiscal statements shall also cover no less than five months of that current fiscal year.

16. Title 5, Section 71810 of the California Code of Regulations states, in pertinent part:

(b) The catalog shall contain the information prescribed by Section 94909 of the Code and all of the following:

(1) The specific beginning and ending dates defining the time period covered by the

1 catalog;

2 (2) A statement of the institution's missions and purposes and the objectives  
3 underlying each of its educational programs;

4 ...

5 (4) Language proficiency information, including: (A) the level of English language  
6 proficiency required of students and the kind of documentation of proficiency, such  
7 as the Test of English as a Foreign Language (TOEFL), that will be accepted; and (B)  
8 whether English language services, including instruction such as ESL, are provided  
9 and, if so, the nature of the service and its cost;

10 ...

11 (6) The institution's policies and practices regarding any form of financial aid,  
12 including all consumer information which the institution is required to disclose to the  
13 student under any state or federal financial aid program;

14 ...

15 (8) The institution's standards for student achievement;

16 (9) A description of the facilities and of the types of equipment and materials that will  
17 be used for instruction;

18 (10) A description of library and other learning resources and the procedures for  
19 student access to those resources;

20 (11) If the institution offers distance education, the approximate number of days that  
21 will elapse between the institution's receipt of student lessons, projects, or  
22 dissertations and the institution's mailing of its response or evaluation.

23 Title 5, Section 70000 of the California Code of Regulations states, in pertinent part:

24 (r) "Mission" means an institution's stated educational reasons to exist. A mission  
25 statement contains all of the following characteristics:

26 (1) The mission includes the institution's broad expectations concerning the education  
27 that students will receive, including the acquisition of the body of knowledge  
28 presented in the educational program, the development of intellectual, analytical, and

critical abilities, and the fostering of values such as a commitment to pursue lifelong learning; and

(2) The mission relates to the educational expectations of the institution's students, faculty and community that the institution serves.

17. Title 5, Section 71735 of the California Code of Regulations states, in pertinent part:

(a) An institution shall have sufficient facilities and necessary equipment to support the achievement of the educational objectives of all of the courses and educational programs in which students are enrolled. If an institution represents that the educational service will fit or prepare a student for employment in a particular occupation or as described in particular job titles, either of the following conditions shall be met:

(1) The equipment used for instruction or provided to the student shall be comparable in model type or features to equipment generally used in those occupations or job titles at the time the instruction is offered.

(2) The institution shall establish that the equipment used for instruction or provided to a student is not obsolete and is sufficient for instructional purposes to reasonably assure that a student acquires the necessary level of education, training, skill, and experience to obtain employment in the field of training and to perform the tasks associated with the occupation or job title to which the educational program was represented to lead.

(b) An institution's facilities, including heating and cooling, ventilation, lighting, classrooms, laboratories, and campus environs, shall be well-maintained. The institution shall maintain all valid permits required by any public agencies relating to the health and safety of the institution's facilities and equipment on file, and such permits shall be available to the Bureau upon request.

18. Title 5, section 71740 of the California Code of Regulations states:

Failure of an institution to have made current payments of the assessments to the Student Tuition Recovery Fund as required by chapter 7 of this Division, and annual

1 fees as required by

2 chapter 5 of this Division shall render the institution ineligible for renewal.

3 19. Title 5, Section 71745 of the California Code of Regulations states, in pertinent  
4 part:

5 (a) The institution shall document that it has at all times sufficient assets and financial  
6 resources to do all of the following:

7 (1) Provide all of the educational programs that the institution represented it would  
8 provide.

9 (2) Ensure that all students admitted to its educational programs have a reasonable  
10 opportunity to complete the programs and obtain their degrees or diplomas.

11 (3) Maintain the minimum standards required by the Act and this chapter.

12 (4) Pay timely refunds as required by Article 13 of the Act.

13 (5) Pay all operating expenses due within 30 days.

14 (6) Maintain a ratio of current assets to current liabilities of 1.25 to 1.00 or greater at  
15 the end of the most recent fiscal year when using generally accepted accounting  
16 principles, or for an institution participating in Title IV of the federal Higher  
17 Education Act of 1965, meet the composite score requirements of the U.S.

18 Department of Education. For the purposes of this section, current assets does not  
19 include: intangible assets, including goodwill, going concern value, organization  
20 expense, startup costs, long-term prepayment of deferred charges, and non-returnable  
21 deposits, or state or federal grant or loan funds that are not the property of the  
22 institution but are held for future disbursement for the benefit of students. Unearned  
23 tuition shall be accounted for in accordance with general accepted accounting  
24 principles.

25 (b) At an institution's request, the Bureau may consider the financial resources of a  
26 parent company if the parent company, as defined by section 94853 of the Code,  
27 meets and maintains all of the following provisions:

28 (1) consents in writing to be sued in California;

(2) consents in writing to be subject to the jurisdiction of the Bureau with respect to the institution's regulation under the Act and this Chapter;

(3) designates and maintains an agent for service of process, consistent with section 74190;

(4) agrees in writing to pay any refund, claim, penalty, or judgment that the institution is obligated to pay; and

(5) files financial reports, maintains financial records, and consents in writing to permit the inspection and copying of financial records to the same extent as is required of the institution.

(c) An institution shall provide to the Bureau its most current financial statements upon request.

20. Title 5, Section 71770 of the California Code of Regulations states in pertinent part:

(a) The institution shall establish specific written standards for student admissions for each educational program. These standards shall be related to the particular educational program. An institution shall not admit any student who is obviously unqualified or who does not appear to have a reasonable prospect of completing the program and shall describe in its admissions policy the criteria used by the institution to determine whether each student is qualified for admission to the educational program ("qualified candidate for admission"). In addition to any specific standards for an educational program, the admissions standards must specify as applicable that:

(1) Each student admitted to an undergraduate degree program, or a diploma program, shall possess a high school diploma or its equivalent, or otherwise meet the institution's criteria for a qualified candidate for admission, including minimum levels of prior education, preparation, skills, or training.

(2) Each student admitted into a post-baccalaureate degree program shall possess a bachelor's degree or its equivalent. If a graduate program leads to a profession or an occupation requiring state licensure and the licensing agency does not require that a member of the profession or occupation possess a Bachelor's degree or its equivalent,

1 this subdivision does not apply.

2 (b) The institution shall specify the maximum credit it will transfer from another  
3 institution for each educational program, and the basis upon which the transferred  
4 credit will be awarded.

5 (1) Except as limited by subdivision (c) of this section, a maximum of 75 percent of  
6 the units or credit that may be applied toward the award of a bachelor's degree may be  
7 derived from a combination of any or both of the following:

8 (A) Units earned at institutions approved by the Bureau, public or private institutions  
9 of higher learning accredited by an accrediting association recognized by the U. S.  
10 Department of Education, or any institution of higher learning, including foreign  
11 institutions, if the institution offering the undergraduate program documents that the  
12 institution of higher learning at which the units were earned offers degree programs  
13 equivalent to degree programs approved by the Bureau or accredited by an  
14 accrediting association recognized by the U.S. Department of Education;

15 (B) Challenge examinations and standardized tests such as the College Level  
16 Placement Tests (CLEP) for specific academic disciplines.

17 (2) No more than 20% of graduate semester units or the equivalent in other units  
18 awarded by another institution may be transferred for credit toward a Master's degree.  
19 An institution may accept transfer credits only from the institutions of higher learning  
20 described in subsection (1)(A).

21 (3) No more than 30 graduate semester credits or its equivalent awarded by another  
22 institution may be credited toward a doctoral degree. This subdivision does not apply  
23 to graduate programs that lead to a profession or an occupation requiring state  
24 licensure where the licensing agency has a regulation permitting a different standard.

25 (c) If credit for prior experiential learning is to be granted, the policy for granting  
26 such credit shall be included in the institution's catalog.

27 (1) An institution may grant credit to a student for prior experiential learning only if:

28 (A) The prior learning is equivalent to a college or university level of learning;

(B) The learning experience demonstrates a balance between theory and practice and;

(C) The credit awarded for the prior learning experience directly relates to the student's degree program and is applied in satisfaction of some of the degree requirements.

(2) Each college or university level learning experience for which credit is sought shall be documented by the student in writing.

(3) Each college or university level learning experience shall be evaluated by faculty qualified in that specific subject area who shall ascertain (1) to what college or university level learning the student's prior experience is equivalent and (2) how many credits toward a degree may be granted for that experience.

(4) The faculty evaluating the prior learning shall prepare a written report indicating all of the following:

(A) The documents in the student's record on which the faculty member relied in determining the nature of the student's prior experience;

(B) The bases for determining that the prior experience (i) is equivalent to college or university level learning and (ii) demonstrates a balance between theory and practice; and

(C) The bases for determining (i) to what college or university level the experience is equivalent and (ii) the proper number of credits to be awarded toward the degree for that experience.

(5)

(A) The institution shall designate at least one administrator to be responsible for the review of faculty determinations regarding the award of credit for prior experiential learning.

(B) The administrator shall document the institution's periodic review of faculty evaluations to assure that the faculty written evaluations and awards of credit comply with this section and the institution's policies and are consistent.

(6) The amount of credit awarded for prior experiential learning shall not be related to

the amount charged the student for the assessment process.

(7)

(A) Of the first 60 semester credits awarded a student in an undergraduate program, no more than 15 semester credits may be awarded for prior experiential learning.

(B) Of the second 60 semester units (i.e., credits 61 to 120) awarded a student in an undergraduate program, no more than 15 semester credits may be awarded for prior experiential learning.

(C) Of the first 30 semester credits awarded a student in a graduate program, no more than 6 semester credits may be awarded for prior experiential learning.

(D) Of the second 30 semester credits (i.e., credits 31 to 60) awarded a student in a graduate program, no more than 3 semester credits may be awarded for prior experiential learning.

(E) No credit for experiential learning may be awarded after a student has obtained 60 semester credits in a graduate program.

21. Title 5, Section 71750 of the California Code of Regulations states, in pertinent part:

(a) Every institution shall make refunds that are no less than the refunds required under the Act and this Division.

(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.

(c) A pro rata refund pursuant to section 94919(c) or 94920(d) or 94927 of the Code shall be no less than the total amount owed by the student for the portion of the



educational program provided subtracted from the amount paid by the student,  
calculated as follows:

(1) The amount owed equals the daily charge for the program (total institutional charge, divided by the number of days or hours in the program), multiplied by the number of days student attended, or was scheduled to attend, prior to withdrawal.

(2) Except as provided for in subdivision (a)(3) of this section, all amounts paid by the student in excess of what is owed as calculated in subdivision (a)(1) shall be refunded.

(3) Except as provided herein, all amounts that the student has paid shall be subject to refund unless the enrollment agreement and the refund policy outlined in the catalog specify amounts paid for an application fee or deposit not more than \$ 250.00, books, supplies, or equipment, and specify whether and under what circumstances those amounts are non-refundable. Except when an institution provides a 100% refund pursuant to section 94919(d) or section 94920(b) of the Code, any assessment paid pursuant to section 94923 of the Code is non-refundable.

(4) For purposes of determining a refund under the Act and this section, a student shall be considered to have withdrawn from an educational program when he or she withdraws or is deemed withdrawn in accordance with the withdrawal policy stated in its catalog.

(d) If an institution has collected money from a student for transmittal on the student's behalf to a third party for a bond, library usage, or fees for a license, application, or examination and the institution has not paid the money to the third party at the time of the student's withdrawal or cancellation, the institution shall refund the money to the student within 45 days of the student's withdrawal or cancellation.

(e) An institution shall refund any credit balance on the student's account within 45 days after the date of the student's completion of, or withdrawal from, the educational program in which the student was enrolled. For purposes of this subdivision and section 94919(d) of the Code, "day" means calendar day.

1 (f) The institution shall maintain a cancellation and withdrawal log, kept current on a  
2 monthly basis, which shall include the names, addresses, telephone numbers, and  
3 dates of cancellations or withdrawal of all students who have cancelled the enrollment  
4 agreement with, or withdrawn from, the institution during the calendar year.

5 22. Title 5, Section 74112 of the California Code of Regulations states, in pertinent  
6 part:

7 (a) Format. The format for the Performance Fact Sheet shall be in at least 12 pt. type,  
8 in an easily readable font, with 1.15 line spacing and all titles and column headings  
9 shall be in bold 14 pt. type, which shall also identify the program for which the  
10 Performance Fact Sheet pertains. The Performance Fact Sheet shall contain all and  
11 only the information required or specifically permitted by sections 94910 and 94929.5  
12 of the Code or this chapter. A separate Performance Fact Sheet shall be prepared for  
13 each program.

14 (b) An institution offering educational programs that are too new to provide the  
15 required two years of data shall include the date the program began as well as the  
16 statement required by section 94910(e) of the Code. The Performance Fact Sheet  
17 shall also disclose the estimated date of availability for two full years of data for those  
18 programs.

19 (c) Institutions approved under section 94874.8 of the Code, which do not include all  
20 required information per section 94874.8(a)(4), shall include on the Performance Fact  
21 Sheet the date of approval to operate and when the required data will be available.

22 (d) In addition to the definitions contained in section 94928 of the Code:

23 (1) "Number of Students Who Began the Program" means the number of students  
24 who began a program who were scheduled to complete the program within 100% of  
25 the published program length within the reporting calendar year, and excludes all  
26 students who cancelled during the cancellation period.

(2) "Number of On-time Graduates" means the number of students who completed the program within 100% of the published program length within the reporting calendar year.

(3) "Gainfully Employed" means:

(A)

(i) The graduate is employed in a job classification under the United States Department of Labor's Standard Occupational Classification codes, using the Detailed Occupation (six-digit) level, for which the institution has identified in its catalog and in its employment positions list required by section 94910(f)(2) of the Code that the program prepares its graduates; and

(ii) The graduate is employed in a single position or concurrent aggregated positions totaling at least 30 hours per week for 5 weeks (35 calendar days), or totaling at least 20 hours per week for 5 weeks (35 calendar days) with a statement signed by the graduate stating that he or she chose to seek part-time employment rather than fulltime employment after graduation; or

(B) The graduate is employed by the same employer that employed the graduate before enrollment, and any of the following conditions are met:

(i) the graduate is employed in an occupation with a different Detailed Occupation (six-digit) level Standard Occupational Classification code than applies to the position in which the graduate was employed before enrollment; or

(ii) the employer or the graduate provides a statement to the effect that the employment after graduation was the result of a promotion with increased pay, due at least in part to graduation from the program; or

(iii) the employer or the graduate provides a statement to the effect that the degree or the completed program was required as a condition of continued employment; or

(C) The graduate is self-employed or working freelance as reasonably evidenced by, but not limited to, a business license, fictitious business name statement, advertising (other than business cards), website, or business receipts or other evidence of income from

business; or an attestation signed by the graduate of self-employment or freelance work and dated after graduation.

(e) Reporting periods:

(1) An Annual Report shall include data for all educational programs as defined in section 94837 of the Code for the previous one calendar year.

(2) A Performance Fact Sheet shall be current and available not later than December 1st, and shall report data for the previous two calendar years based upon the "number of students who began the program," as defined in subdivision (d)(1) of this section and were scheduled to graduate in the reported year(s).

(f) Total Charges. The institution's Annual Report and Performance Fact Sheet shall include the total charges for a student to complete the program within 100% of the program length. The institution must include the disclosure that there may be additional charges if the program is not completed on-time.

Total charges shall be disclosed in the Performance Fact Sheet in a format substantially similar to the format listed below (dates and numbers are for example only):

Cost of Educational Program:

Total Charges for the program for students completing on-time in 20XX: \$ 50,000.

Total Charges may be higher for students that do not complete on-time.

Student's Initials: Date:

Initial only after you have had sufficient time to read and understand the information.

(g) Student Loan/Debt Information.

(1) If the institution participates in federal financial aid programs, the institution shall include loan information in the institution's Annual Report and on the Performance Fact Sheet. The loan information shall include:

(A) The most recent three year cohort default rate, as reported by the United States Department of Education;

(B) The percentage of enrolled students receiving federal student loans;

1 (C) The average amount of federal student loan debt of those graduates who have  
2 federal student loan debt in the reporting year; and

3 (D) The percentage of graduates with federal student loans, as calculated by the  
4 institution.

5 Loan information shall be included in the Performance Fact Sheet in a format  
6 substantially similar to the format listed below (dates and numbers are for example only):

7 Student's Initials: Date:

8 Initial only after you have had sufficient time to read and understand the  
9 information.

10 (2) Institutions that do not participate in federal financial aid programs shall include  
11 one of two statements in the Performance Fact Sheet in a format substantially similar to  
12 the following:

13 Students at (name of institution) are not eligible for federal student loans. The U.S.  
14 Department of Education has determined that this institution does not meet the criteria that  
15 would allow its students to participate in federal student aid programs.

16 or

17 (Name of Institution) is eligible, but chooses not to participate in federal student aid  
18 programs. So students here do not have federal student loans.

19 Student's Initials: Date:

20 Initial only after you have had sufficient time to read and understand the  
21 information.

22 (h) Completion Rates. Reporting of completion rates for an institution's Annual  
23 Report and Performance Fact Sheet shall include, for each educational program, the  
24 number of students who began the program as defined in subdivision (d)(1) of this section,  
25 the number of students available for graduation, number of on-time graduates, and  
26 completion rate(s). An optional table may be added to include completion rate data for  
27 students completing within 150% of the published program length. For an institution  
28 reporting completion data pursuant to section 94929(b) of the Code, completion data shall

1 be separately reported for each program and the Performance Fact Sheet shall disclose, if  
2 true, that the completion data is being reported for students completing within 150% of the  
3 published program length, and that data is not being separately reported for students  
4 completing the program within 100% of the published program length. Programs that are  
5 more than one year in length which are reporting 150% Completion Rate will provide four  
6 calendar years of data.

7 Completion rates shall be included in the Performance Fact Sheet in a format  
8 substantially similar to the chart below (dates, numbers, and other data shown are for  
9 example only):

10 On-time Completion Rates (Graduation Rates) (includes data for the two calendar  
11 years prior to reporting)

12 Name of Educational Program (Program Length)

13 %g\*%gIncluded only if program is more than one year in length

14 Student's Initials: Date:

15 Initial only after you have had sufficient time to read and understand the  
16 information.

17 (i) Job Placement Rates.

18 (1) Any placement data required by sections 94910(b) and 94929.5(a) of the Code  
19 shall be reported for the number of students who began the program as defined in  
20 subdivision (d)(1) of this section for each reported calendar year.

21 (2) Placement is measured six months from the graduation date of each student. For  
22 programs that require passage of a licensing examination, placement shall be measured six  
23 months after the announcement of the examination results for the first examination  
24 available after a student completes an applicable educational program. Reporting of  
25 placement rates shall include for each educational program: the number of students who  
26 began the program, the number of graduates as defined in section 94842 of the Code, the  
27 graduates available for employment, graduates employed in the field and job placement  
28 rate(s).

(3) If the institution makes any claim related to preparing students for a job or regarding job placement, the list required by section 94910(f)(2) of the Code shall identify the employment positions by using the Detailed Occupation or six-digit level of the Standard Occupational Classification codes.

(4) Placement rate shall be calculated as follows: the number of graduates employed in the field as defined in section 94928(e)(1) of the Code in conjunction with section 74112(d)(3) divided by the number of graduates available for employment as defined in section 94928(d) of the Code.

Job Placement rates and related disclosures shall be included in the Performance Fact Sheet in a format substantially similar to the charts below, (dates, numbers, and other data shown are for example only):

Job Placement Rates (includes data for the two calendar years prior to reporting)

Name of Educational Program (Program Length)

Student's Initials: Date:

Initial only after you have had sufficient time to read and understand the information.

(5) The following self-employment/freelance worker disclosure shall be initialed by students entering any programs in which the majority of graduates who obtain jobs obtain in this type of work:

This program may result in freelance or self-employment.

%B8 The work available to graduates of this program is usually for freelance or self-employment.

%B8 This type of work may not be consistent.

%B8 The period of employment can range from one day to weeks to several months.

%B8 Hours worked in a day or week may be more or less than the traditional 8 hour work day or 40 hour work week.

1           %B8 You can expect to spend unpaid time expanding your networks, advertising,  
2 promoting your services, or honing your skills.

3           %B8 Once graduates begin to work freelance or are self-employed, they will be  
4 asked to provide documentation that they are employed as such so that they may be  
5 counted as placed for our job placement records.

6           %B8 Students initialing this disclosure understand that either a majority or all of  
7 this school's graduates are employed in this manner and understand what comprises this  
8 work style.

9           Student's Initials: Date:

10           Only initial after you have had sufficient time to read and understand the  
11 information.

12           (j) License Examination Passage Rates. If license examination passage rates are not  
13 available from the appropriate state agency, an institution shall collect the information  
14 directly from its graduates. If an institution demonstrates that, after reasonable efforts, it is  
15 unable to obtain the examination passage information from its graduates, the institution  
16 shall report the number of students it could not contact and note in a font the same size as  
17 the majority of the data on the Performance Fact Sheet, "License examination passage  
18 data is not available from the state agency administering the examination. We were unable  
19 to collect data from [enter the number] graduates."

20           Reporting of license examination passage rates for the Annual Report and the  
21 Performance Fact Sheet shall include, for each educational program: the number of  
22 graduates in the reported year, the number of documented graduates who passed the first  
23 available examination, number of documented graduates who failed the first available  
24 examination, the number of graduates for whom data is not available. An optional column  
25 may be added to separately report licensing examination data for graduates who take and  
26 pass the exam after failing initially. The Annual Report shall also include a description of  
27 the processes for attempting to contact those students.  
28



For licensing examinations that are not continuously administered, license examination passage rates shall be included in the Performance Fact Sheet in a format substantially similar to the chart below, (dates, numbers, and other data shown are for example only):

License Examination Passage Rates (includes data for the two calendar years prior to reporting)

Name of Educational Program (Program Length)

License examination passage data is not available from the state agency administering the examination. We were unable to collect data from 32 graduates.

Student's Initials: Date:

Initial only after you have had sufficient time to read and understand the information.

For licensing examinations that are continuously administered, license examination passage rates shall be included in the Performance Fact Sheet in a format substantially similar to the chart below (dates, numbers, and other data shown are for example only):

License Examination Passage Rates (includes data for the two calendar years prior to reporting)

Name of Educational Program (Program Length)

*License examination passage data is not available from the state agency administering the examination. We were unable to collect data from 10 graduates.*

Student's Initials: Date:

Initial only after you have had sufficient time to read and understand the information.

(k) Salary and Wage Information.

All Salary and Wage Information shall be reported to the Bureau pursuant to sections 94910(d) and 94929.5(a)(3) of the Code and shall be included in the Performance Fact Sheet, for each educational program, in a format substantially similar to the chart below (dates, numbers, salaries, and other data shown are for example only).

1 Salary and Wage Information (includes data for the two calendar years prior to  
2 reporting)

3 Name of Educational Program (Program Length)

4 A list of sources used to substantiate salary disclosures is available from the school.  
5 (Insert how student can obtain this information.)

6 Student's Initials: Date:

7 Initial only after you have had sufficient time to read and understand the  
8 information.

9 (l) Definitions. Definitions for all terms contained on the Performance Fact Sheet  
10 shall be included as part of the Performance Fact Sheet, in the same format as required in  
11 subdivision (a).

12 The following are the definitions for the Performance Fact Sheet:

13 "Number of Students Who Began the Program" means the number of students who  
14 began a program who were scheduled to complete the program within 100% of the  
15 published program length within the reporting calendar year and excludes all students who  
16 cancelled during the cancellation period.

17 "Students Available for Graduation" is the number of students who began the  
18 program minus the number of students who have died, been incarcerated, or been called to  
19 active military duty.

20 "Number of On-time Graduates" is the number of students who completed the  
21 program within 100% of the published program length within the reporting calendar year.

22 "On-time Completion Rate" is the number of on-time graduates divided by the  
23 number of students available for graduation.

24 "150% Graduates" is the number of students who completed the program within  
25 150% of the program length (includes on-time graduates).

26 "150% Completion Rate" is the number of students who completed the program in  
27 the reported calendar year within 150% of the published program length, including on-  
28 time graduates, divided by the number of students available for graduation.

1 "Graduates Available for Employment" means the number of graduates minus the  
2 number of graduates unavailable for employment.

3 "Graduates Unavailable for Employment" means the graduates who, after  
4 graduation, die, become incarcerated, are called to active military duty, are international  
5 students that leave the United States or do not have a visa allowing employment in the  
6 United States, or are continuing their education in an accredited or bureau-approved  
7 postsecondary institution.

8 "Graduates Employed in the Field" means graduates who beginning within six  
9 months after a student completes the applicable educational program are gainfully  
10 employed, whose employment has been reported, and for whom the institution has  
11 documented verification of employment.

12 For occupations for which the state requires passing an examination, the six month  
13 period begins after the announcement of the examination results for the first examination  
14 available after a student completes an applicable educational program.

15 "Placement Rate Employed in the Field" is calculated by dividing the number of  
16 graduates gainfully employed in the field by the number of graduates available for  
17 employment.

18 "Number of Graduates Taking Exam" is the number of graduates who took the first  
19 available exam in the reported calendar year.

20 "First Available Exam Date" is the date for the first available exam after a student  
21 completed a program.

22 "Passage Rate" is calculated by dividing the number of graduates who passed the  
23 exam by the number of graduates who took the reported licensing exam.

24 "Number Who Passed First Available Exam" is the number of graduates who took  
25 and passed the first available licensing exam after completing the program.

26 "Salary" is as reported by graduate or graduate's employer.

27 "No Salary Information Reported" is the number of graduates for whom, after  
28 making reasonable attempts, the school was not able to obtain salary information.

1 (m) Documentation supporting all data reported shall be maintained electronically  
2 by the institution for at least five years from the last time the data was included in either  
3 an Annual Report or a Performance Fact Sheet and shall be provided to the Bureau upon  
4 request; the data for each program shall include at a minimum:

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

7 (2) student name(s), address, phone number, email address, program completed,  
8 program start date, scheduled completion date, and actual completion date;

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

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

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

18 (6) a description of all attempts to contact each student or employer;

19 (7) any and all documentation used to provide data regarding license examinations  
20 and examination results;

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

24 (9) the name, email address, phone number, and position or title of the institution's  
25 representative who was primarily responsible for obtaining the students' completion,  
26 placement, licensing, and salary and wage data, the date that the information was  
27 gathered, and copies of notes, letters or emails through which the information was  
28 requested and gathered.

(n) The institution shall provide on a separate document along with the Performance Fact Sheet the same cancellation disclosure as that which is required to be included with the enrollment agreement by Section 94911(e)(1) of the Code. The separate document shall be substantially the same size as the Performance Fact Sheet and shall be captioned "STUDENT'S RIGHT TO CANCEL" using bold 14 pt. type.

23. Title 5, Section 74117 of the California Code of Regulations states:

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.

24. Title 5, Section 71485 of the California Code of Regulations states:

Failure of an institution to have made current payments of the assessments to the Student Tuition Recovery Fund as required by chapter 7 of this Division, and annual fees as required by chapter 5 of this Division shall render the institution ineligible for renewal.

25. Title 5, Section 76130 of the California Code of Regulations states:

(e) Submission of all prior reports and assessments required by this section is a condition of renewal.

26. Title 5, Section 74000 of the California Code of Regulations states:

(d) The Bureau shall deny a renewal of an approval to operate if the institution fails to submit at the time it files its application for renewal of an approval to operate: all unpaid fees; penalty fees; penalties; orders for reimbursement of costs and expenses; and assessments for, and reimbursement of all payments made to students from, the Student Tuition Recovery Fund.

### **FACTUAL BACKGROUND**

27. On or about May 20, 2021, the Bureau received an Application for Renewal of Approval to Operate and Offer Educational Programs for Non-Accredited Institutions.

28. On December 22, 2021, the Bureau sent the first Licensing deficiency letter to Respondent.

1           29. On January 28, 2022, February 1, 2022, and September 21, 2022, the Bureau received  
2 Respondent's response to the first deficiency letter to Respondent.

3           30. On October 3, 2022, the Bureau sent an email to the institution to get clarification on  
4 the institution's response to Section 12 and 19.

5           31. One October 5, 2022, the Bureau received an email that included responses to Section  
6 12 and 19.

7           32. On October 28, 2022, the Bureau sent the second Licensing deficiency letter to  
8 Respondent.

9           33. On February 17, 2023, the Bureau received a Non-Substantive Change request from  
10 Respondent.

11           34. On March 3, 2023, the Bureau received Respondent's response to the second  
12 Licensing deficiency letter from Respondent.

13           35. On January 17, 2024, the Bureau sent the third Licensing deficiency letter to  
14 Respondent.

15           36. On January 23, 2024, the Bureau received an email acknowledging receipt of the  
16 deficiency letter.

17           37. On September 24, 2024, the Bureau mailed a Notice of Denial of Application for  
18 Approval to Operate to Respondent.

19           38. On October 8, 2024, the Bureau received an appeal for the denial of application  
20 34490 and request for Administrative Hearing.

21                           **FIRST CAUSE FOR DENIAL OF APPLICATION**

22                                   **(Incomplete Application)**

23           39. Respondent's application for renewal is subject to denial under California Code of  
24 Regulations, title 5, section 71475(c)(2); (c)(4) and 71660 in that on or about February 17, 2023,  
25 Respondent notified the Bureau of the lease of a classroom but failed to specify if the classroom  
26 is a satellite location or an update of Respondent's main location address. Complainant  
27 incorporates paragraphs 27 through 38 as set forth fully.

28           ///

1                                   **SECOND CAUSE FOR DENIAL OF APPLICATION**

2                                   **(Failure to Provide Financial Resources Information)**

3           40.   Respondent's application for renewal is subject to denial under California Code of  
4 Regulations, title 5, section 71475(e), 71475 and 74115 in that on or about February 1, 2022,  
5 Respondent failed to provide reviewed or audited financial statements completed by an  
6 Independent Certified Public Accountant for the period of January through December of 2020.  
7 Complainant incorporates paragraphs 27 through 38 as set forth fully.

8                                   **THIRD CAUSE FOR DENIAL OF APPLICATION**

9                                   **(Failed to Meet Minimum Operating Standards- Catalog)**

10          41.   Respondent's application for renewal is subject to denial under California  
11 Education Code sections 94891 subdivision (b), in conjunction with the California Code of  
12 Regulations, title 5, section 71700, for failing to meet the legally required minimum operating  
13 standards. The deficiencies are as follows:

14           a.    The institution does not provide a statement indicating how the institution will  
15 provide the catalog to a prospective student and any interested person. (CEC § 94909(a) and  
16 94909(c)).

17           b.    The catalog has a different address for the main location other than the approved  
18 main location address. (CEC § 94909(a)(1)).

19           c.    The catalog has missing and incomplete addresses for where class sessions will be  
20 held. (CEC § 94909(a)(4)).

21           d.    The time period covered by the catalog does not include specific beginning and  
22 ending dates. (5 CCR § 71810(b)(1)).

23           e.    The institution's missions and objectives statement does not include the objections  
24 underlying each of its educational programs. (5 CCR § 70000(r) and 71810(b)(2)).

25           f.    The catalog contained a description of the facilities and of the types of equipment  
26 and material that will be used for instruction; however, some of the addresses listed were  
27 incomplete and does not include the type of equipment and materials that will be used for  
28 instruction. (5 CCR § 71735 and 71810(b)(9)).

1           g.       The catalog contained a description of the library and other learning resources.  
2       However, the procedures for student access to the resources was not included. (5 CCR §  
3       71740(d)(3) and 71810(b)(10)).

4           h.       The catalog states there are no prerequisites required for entrance into IPSB  
5       foundation. However, individual class prerequisites were found under each course description.  
6       The admission requirements did not include any information regarding prerequisites for each  
7       educational program. (CEC § 94909(a)(8)(A) and 5 CCR § 71770).

8           i.       The catalog contained language proficiency information; however, the level of  
9       English language proficiency required of students and the kind of documentation of proficiency  
10      that will be accepted was not included. (5 CCR § 71810(b)(4)).

11          j.       The institution has unapproved programs listed in the catalog and was advised to  
12      submit a non-substantive change request to add related programs. The institution was also  
13      provided the Educational Program definition to refer to and determine if the unapproved  
14      programs meet the definition. (CEC § 94909(a)(5)).

15          k.       The programs and courses listed in the catalog do not include any final tests or  
16      examinations, or other increments required for program completion. (CEC § 94909(a)(5)).

17          l.       The catalog did not contain the schedule of total charges for a period of attendance  
18      and an estimated schedule of total changes for the entire educational program for each  
19      educational program. (CEC § 94870 and 94909(a)(9)).

20          m.       The withdrawals and refund policies referenced in the catalog are different from  
21      the withdrawals and refund policies referenced on the enrollment agreements. The withdrawal  
22      and refund policy information are inconsistent. (CEC § 94909(a)(8)(B), 94919, 94920, and 5  
23      CCR § 71750).

24          n.       The institution states in the catalog that program students may apply for a payment  
25      plan; however, payment plans are not available to non-program students. The institution did not  
26      include details as to why the non-program students are not allowed to apply for payments plans.  
27      (5 CCR § 71810(b)(6)).  
28



1           o.       The catalog included the institution's standards for student achievement; however,  
2 the institution states that grades are based on an evaluation of pass or fail, measured by a  
3 combination of attendance, performance of technique, and examinations and did not include how  
4 the students grades are calculated during test, exams, and finals, to determine their overall grades.  
5 (5 CCR § 71810(b)(8)).

6           p.       The institution did not identify in its catalog, the job classifications each program  
7 prepares its graduates for using the United States Department of Labor's Standard of  
8 Occupational Classification codes, at the detailed occupation (six digit) level. (5 CCR §  
9 74112(d)(3)).

10          q.       The catalog did not include information regarding if distance education is offered  
11 and if offered, did not include the approximate number of days that will elapse between the  
12 institution's receipt of student lessons, projects, or dissertations and the institutions mailing of its  
13 response or evaluation. (5 CCR § 71810(b)(11)).

14          r.       The institution did not provide on the homepage of their website clear and  
15 conspicuous links for a current catalog, School Performance Facts Sheets for each educational  
16 program, student brochure (if applicable), the Bureaus website and the most recent annual report  
17 submitted to the Bureau. (CEC § 94913 and 5 CCR § 74117).

18          s.       The institution did not provide School Performance Fact Sheets. (CEC § 94910  
19 and 5 CCR § 74112).

20          t.       The last page of the catalog contains logos from government agencies,  
21 public/private corporations, and/or associations; however, pursuant to CEC § 94897(i)(1) an  
22 institution shall not use a name in any manner improperly implying the institution is affiliated  
23 with any government agency, public or private corporation, or association, if it is not, in fact, thus  
24 affiliated. (CEC § 94897(i)(1)).

**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 IPSB School of Integrative Psycho-Structural Bodywork (Respondent), owned by Foundation for Life Energy, Inc., for Renewal to Operate a Non-Accredited Institution;

2. Taking such other and further action as deemed necessary and proper.

DATED: 6/25/2025

"Original Signature on File"

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

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