



## AFFIRMED CITATION ORDER

<b>Citation Issued To:</b> University of East-West Medicine 595 Lawrence Expressway Sunnyvale, CA 94085  <b>Institution Code:</b> 4306581	<b>Citation Number:</b> 24250157
	<b>Total Fine Amount:</b> <b>\$4,503.00</b>
	<b>Order of Abatement Included:</b> Yes

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

### LICENSING HISTORY

- On or about December 9, 2021, the Bureau renewed an Approval to Operate an Accredited Private Postsecondary Institution, Institution Code 4306581, to University of East-West Medicine, hereinafter referred to as the "Institution." This Approval to Operate will expire on or about August 31, 2028, unless renewed.

### DISCIPLINE HISTORY

- The Institution has the following discipline history:
  - [Citation No. 1819149, issued March 20, 2019](#)
    - Evidence of compliance; citation satisfied May 6, 2019
  - [Affirmed Citation No. 1920223, issued April 15, 2020](#)
    - Evidence of compliance; citation satisfied April 6, 2020

### CITATION JURISDICTION

- This administrative citation is issued to the Institution pursuant to the statutory provisions of 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 January 16, 2025, the Bureau issued Citation No. 24250157. On or about February 13, 2025, the Bureau received an appeal with a request for an informal conference. The informal conference was held on March 17, 2025. No new substantive facts were presented during the informal conference; therefore, the Bureau affirms Citation No. 24250157.

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

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

**Violation #1:**

**5 CCR section 71920(b)(9) and (b)(10) – Student Records and 5 CCR section 71930(a) – Maintenance of Records**

**Cause for Citation:** On or about November 30, 2023, the Bureau conducted an announced compliance inspection pursuant to CEC section 94932.5(a). Bureau staff reviewed three current, three graduated, and three dropped/withdrawn student files. All student files reviewed failed to include a document showing the money received from or on behalf of the student and the date or dates on which the money was received in accordance with 5 CCR section 71920(b)(9). Additionally, Bureau staff determined that the dropped/withdrawn student files failed to include a refund document consistent with 5 CCR section 71920(b)(10).

**Administrative Fine:** Pursuant to 5 CCR section 75030, the Bureau has determined this to be a “Class B” violation. The Institution is issued a fine of \$1,001.00.

**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 5 CCR sections 71920 and 71930. The Institution must submit a statement of attestation they have corrected the violation and ensured that all student records contain refund information. The statement of attestation must be dated and signed by an authorized representative of the Institution.

**Violation #2:**

**5 CCR section 76140(a)(5), (a)(6), (a)(11) and (b) – Record-Keeping Requirements and 5 CCR section 71930(a) – Maintenance of Records**

**Cause for Citation:** Prior to the scheduled compliance inspection, Bureau staff conducted a review of the supporting documentation for the 1<sup>st</sup>, 2<sup>nd</sup>, and 3<sup>rd</sup> quarters of the 2023 Student Tuition Recovery Fund (STRF) Assessment forms. Bureau staff determined the supporting documentation did not capture required data points in accordance with 5 CCR section 76140(a)(5), (a)(6), (a)(11).

On or about November 30, 2023, the Bureau conducted an announced compliance inspection pursuant to CEC section 94932.5(a). Bureau staff provided the Institution an opportunity to correct the STRF supporting documentation. The Bureau determined that the Institution failed to substantiate the data reported on the Institutions STRF Assessment Reporting Forms and records of the students' eligibility under the Fund.

**Administrative Fine:** Pursuant to 5 CCR section 75030, the Bureau has determined this to be a “Class B” violation. The Institution is issued a fine of \$1,001.00.

**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 submitting an electronic copy of the template used by the Institution to document supporting data for STRF for the Bureau to verify the institution is collecting the required data points pursuant to 5 CCR section 76140.

The Institution must submit a statement of attestation they have corrected the violation and will ensure that the substantiating data for STRF is maintained in an electronic format and readily available to a Bureau representative upon request pursuant to 5 CCR section 76140 and 71930. The statement of attestation must be dated and signed by an authorized representative of the Institution.

**Violation #3:**

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

**Cause for Citation:** Prior to the scheduled compliance inspection, Bureau staff reviewed supporting documentation for the Institution's 2020/2021 School Performance Fact Sheet (SPFS). The spreadsheet provided failed to include the required data points pursuant to 5 CCR section 74112 (m)(1-9).

On or about November 30, 2023, the Bureau conducted an announced compliance inspection pursuant to CEC section 94932.5(a). During the onsite inspection, Bureau staff informed the Institution's vice president of the deficient submission and gave an opportunity to provide the missing items. Bureau staff determined the Institution failed to maintain all the required data, pursuant to 5 CCR section 74112 (m)(1-9).

**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.

**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 they have 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.

**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 affirmed 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 – Aspen Grambusch  
1747 North Market, Blvd., Suite 225  
Sacramento, CA 95834
- Email: [bppe.discipline@dca.ca.gov](mailto: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 \$4,503.00 for the violations described above. Payment of the fines must be made to the Bureau within 30 days from the date of issuance of this affirmed 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 – Aspen Grambusch  
1747 North Market, Blvd., Suite 225  
Sacramento, CA 95834

### **NOTICE OF APPEAL RIGHTS**

8. Pursuant to 5 CCR section 75040(d), the affirmed 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. If the Institution has not requested to withdraw the hearing, a hearing will be set to hear the matter.

### **COMPLIANCE WITH FINE AND/OR ORDER OR ABATEMENT DISCLOSURE**

9. Pursuant to 5 CCR section 75050, payment of fine and/or compliance with any order of abatement does not constitute an admission of the violation

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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 Aspen Grambusch, Citation Analyst by email at [Aspen.Grambusch@dca.ca.gov](mailto:Aspen.Grambusch@dca.ca.gov) or by phone at (279) 895-6005.

“Original Signature on File”

3/19/2025

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Elizabeth Elias  
Deputy Bureau Chief of Enforcement

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Citation Date of Issuance

Enclosures:

- Payment of Fine
- Declaration of Service by Certified and First-Class Mail