



## CITATION ORDER

<b>Citation Issued To:</b> Underwood University 1818 S. Western Avenue, Suite 400 Los Angeles, CA 90006  <b>Institution Code:</b> 53555945	<b>Citation Number:</b> 2324071  <b>Total Fine Amount:</b> <b>\$2,501.00</b>  <b>Order of Abatement Included:</b> Yes
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Elizabeth Elias issues this 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

1. On or about August 19, 2020, the Bureau issued an Approval to Operate a Private Postsecondary Institution, Institution Code 53555945, to Underwood University (hereinafter referred to as the "Institution"). This Approval to Operate will expire on or about November 30, 2024, unless renewed.

### DISCIPLINE HISTORY

2. The Institution has the following discipline history:
  - [Citation No. 23240256, issued April 11, 2024](#)
    - Evidence of compliance; citation satisfied May 15, 2024

### CITATION JURISDICTION

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

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

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

**Violation #1:**

**CEC section 94902 (b)(1)(3) – General Enrollment Requirements and CEC section 94912 – Signature, Initials Required**

**Cause for Citation:** On or about March 6, 2023, the Bureau conducted an announced compliance inspection pursuant to CEC section 94932.5 (a). Bureau staff reviewed four student files and found that the none of the files contained a signed Student Performance Fact Sheet (SPFS). The Institution's Director and Director of Planning and Institutional Compliance stated that they were unaware of the requirement.

**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 CEC sections 94902 and 94912. The Institution must submit a statement of attestation that they have corrected the violation and will ensure that all student records contain signed and dated (SPFS) prior to the execution of the enrollment agreement. The statement of attestation must be dated and signed by an authorized representative of the Institution.

**Violation #2:**

**CEC section 94935 (b) – Notice to Comply in conjunction with 5 CCR section 75010 (h)**

**Cause for Citation:** On or about May 6, 2023, the Bureau conducted an announced compliance inspection pursuant to CEC section 94932.5 (a). At the conclusion of the inspection, Bureau staff issued a Notice to Comply (NTC) pursuant to CEC section 94935 and 5 CCR section 75010. The Institution failed to remedy the non-compliance identified in the NTC by the due date of June 5, 2023.

**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 \$2,500.00.

**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 violations identified in the Notice to Comply and submit proof of compliance pursuant to CEC section 94935.

### COMPLIANCE WITH ORDER OF ABATEMENT

5. In accordance with the provisions of CEC section 94936 and 5 CCR section 75020, 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 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 – Tessa Barron  
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

6. In accordance with the provisions of CEC section 94936, and 5 CCR sections 75020 and 75030, the Bureau hereby orders this assessment of fines in the total amount of \$2,501.00 for the violations described above. Payment of the fines must be made to the Bureau within 30 days from the date of service of this citation unless an informal conference or hearing is requested. 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 – Tessa Barron  
1747 North Market, Blvd., Suite 225  
Sacramento, CA 95834

### **NOTICE OF APPEAL RIGHTS**

7. You have the right to contest this citation through an informal conference with the Bureau pursuant to 5 CCR section 75020 and/or through an administrative hearing in accordance with Chapter 5 (Commencing with section 11500) of Part 1 of Division 3 of Title 2 of the Government Code.

If you wish to contest this citation, you may submit a written request to the Bureau or submit the enclosed *Notice of Appeal of Citation – Request for Informal Conference and/or Administrative Hearing* form within 30 days from the date of issuance of this citation.

Failure to submit a written request for an informal conference and/or administrative hearing within 30 days from the date of issuance of this citation will forfeit your ability to appeal the citation.

If a hearing is requested, you are not required to comply with this citation until a final order is entered against you.

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

8. Pursuant to BPC section 125.9 and 5 CCR section 75050, payment of fine and/or compliance with any order of abatement does not constitute an admission of the violation charged and shall be represented as satisfactory resolution of the matter for the purposes of public disclosure.

Pursuant to 5 CCR 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.

Citation Number: 2324071  
Institution: Underwood University  
Institution Code: 53555945

### **BUREAU CONTACT INFORMATION**

9. If you have any questions regarding this Citation, please contact Tessa Barron, Citation Analyst by email at [Tessa.Barron@dca.ca.gov](mailto:Tessa.Barron@dca.ca.gov) or by phone at (916) 574-7791.

“Original Signature on File”

6/27/2024

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Elizabeth Elias  
Enforcement Chief

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Citation Date of Issuance

Enclosures:

- Notice of Appeal of Citation: Request for Informal Conference and/or Administrative Hearing
- Payment of Fine – Waiver of Appeal
- Declaration of Service by Certified and First-Class Mail