BEFORE THE DIRECTOR DEPARTMENT OF CONSUMER AFFAIRS BUREAU FOR PRIVATE POSTSECONDARY EDUCATION STATE OF CALIFORNIA

In the Matter of the Accusation Against:

HIGH DESERT EMT

12241 Industrial Blvd., #208

Victorville, CA 92395

Mailing Address:

P.O. Box 2117

Apple Valley, CA 92395

Institution Code: 71435217

Case No.: BPPE22-169

Respondent.

DECISION AND ORDER

The attached Stipulated Revocation of Approval to Operate and Order is hereby

accepted and adopted by the Director of the Department of Consumer Affairs as the Decision in

the above-entitled matter.

This Decision shall become effective on <u>June 16</u>, 2023.

It is so ORDERED <u>May 12</u>, 2023.

<u>"Original Signature on File"</u> RYAN MARCROFT DEPUTY DIRECTOR, LEGAL AFFAIRS DIVISION DEPARTMENT OF CONSUMER AFFAIRS

1	ROB BONTA Attorney General of California	
2	NANCY A. KAISER Supervising Deputy Attorney General	
3 4	LANGSTON M. EDWARDS Deputy Attorney General State Bar No. 237926	
+ 5	300 So. Spring Street, Suite 1702 Los Angeles, CA 90013	
6	Telephone: (213) 269-6371 Facsimile: (916) 731-2126	
7	Attorneys for Complainant	
8	BEFOR	Е ТНЕ
9	DEPARTMENT OF CO FOR THE BUREAU FOR PRIVATE	
10	STATE OF C.	ALIFORNIA
11	In the Matter of the Accusation Against:	Case No. BPPE22-169
12	HIGH DESERT EMT	
13	12241 Industrial Blvd., #208 Victorville, CA 92395	STIPULATED REVOCATION OF APPROVAL TO OPERATE AND
14	MAILING ADDRESS P.O. Box 2117	ORDER
15	Apple Valley, CA 92395	
16 17	Approval to Operate Institution Code No. 71435217	
18	Respondent.	
19		
20	IT IS HEREBY STIPULATED AND AGR	EED by and between the parties to the above-
21	entitled proceedings that the following matters are	e true:
22	PART	<u>TIES</u>
23	1. Deborah Cochrane (Complainant) is t	he Chief of the Bureau for Private
24	Postsecondary Education (Bureau). She brought	this action solely in her official capacity and is
25	represented in this matter by Rob Bonta, Attorney	General of the State of California, by Langston
26	M. Edwards, Deputy Attorney General.	
27		ident) is representing herself in this proceeding
28	and has chosen not to exercise her right to be repr	esented by counsel.
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I	Stimulated Revocation of Approval	to Operate and Order – BPPE (Case No. BPPE??-169)

1	3. On or about November 10, 2020, the Bureau issued Approval to Operate Institution
2	Code No. 71435217 to High Desert EMT, owned by Kalli Tice. The Approval to Operate
3	Institution Code No. 71435217 was in full force and effect at all times relevant to the charges
4	brought in Accusation No. BPPE22-169 and will expire on November 10, 2025, unless renewed.
5	JURISDICTION
6	4. Accusation No. BPPE22-169 was filed on February 2, 2023 before the Director of the
7	Department of Consumer Affairs (Director) for the Bureau, and is currently pending against
8	Respondent. The Accusation and all other statutorily required documents were properly served
9	on Respondent on February 8, 2023. Respondent timely filed her Notice of Defense contesting
10	the Accusation. A copy of Accusation No. BPPE22-169 is attached as Exhibit A and
11	incorporated by reference.
12	ADVISEMENT AND WAIVERS
13	5. Respondent has carefully read, and understands the charges and allegations in
14	Accusation No. BPPE22-169. Respondent also has carefully read, and understands the effects of
15	this Stipulated Revocation of Approval to Operate Institution Code No. 71435217.
16	6. Respondent is fully aware of her legal rights in this matter, including the right to a
17	hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at
18	her own expense; the right to confront and cross-examine the witnesses against her; the right to
19	present evidence and to testify on her own behalf; the right to the issuance of subpoenas to
20	compel the attendance of witnesses and the production of documents; the right to reconsideration
21	and court review of an adverse decision; and all other rights accorded by the California
22	Administrative Procedure Act and other applicable laws.
23	7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
24	every right set forth above.
25	<u>CULPABILITY</u>
26	8. Respondent admits the truth of each and every charge and allegation in Accusation
27	No. BPPE22-169, agrees that cause exists for discipline and hereby stipulates to revocation of her
28	Approval to Operate Institution Code No. 71435217 for the Bureau's formal acceptance.
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	Stipulated Revocation of Approval to Operate and Order – BPPE (Case No. BPPE?2-169)

Stipulated Revocation of Approval to Operate and Order - BPPE (Case No. BPPE22-169)

9. Respondent understands that by signing this stipulation she enables the Bureau to issue an order accepting the Revocation of Approval to Operate Institution Code No. 71435217 without further process.

10. Respondent further understands and agrees that the Bureau may deny an application
for an approval to operate any institution that would be owned by, have persons in control of, or
employ institution managers that had knowledge of, should have known, or knowingly
participated in any conduct that was the cause for revocation or unmitigated discipline at another
institution pursuant to Education Code section 94887.

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CONTINGENCY

This stipulation shall be subject to approval by the Director of the Department of 11. 10 Consumer Affairs or the Director's designee. Respondent understands and agrees that counsel for 11 Complainant and the staff of the Bureau may communicate directly with the Bureau regarding 12 this stipulation and revocation, without notice to or participation by Respondent. By signing the 13 14 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Bureau considers and acts upon it. If the Bureau 15 fails to adopt this stipulation as its Decision and Order, the Stipulated Revocation of Approval to 16 Operate Institution Code No. 71435217 shall be of no force or effect, except for this paragraph, it 17 shall be inadmissible in any legal action between the parties, and the Bureau shall not be 18 19 disqualified from further action by having considered this matter.

12. The parties understand and agree that Portable Document Format (PDF) and facsimile
copies of this Stipulated Revocation of Approval to Operate Institution Code No. 71435217,
including PDF and facsimile signatures thereto, shall have the same force and effect as the
originals.

This Stipulated Revocation of Approval to Operate Institution Code No. 71435217 is
intended by the parties to be an integrated writing representing the complete, final, and exclusive
embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements,
understandings, discussions, negotiations, and commitments (written or oral). This Stipulated
Revocation of Approval to Operate Institution Code No. 71435217 may not be altered, amended,

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modified, supplemented, or otherwise changed except by a writing executed by an authorized 2 representative of each of the parties.

14. In consideration of the foregoing admissions and stipulations, the parties agree that the Bureau may, without further notice or formal proceeding, issue and enter the following Order:

ORDER

IT IS HEREBY ORDERED that Approval to Operate Institution Code No. 71435217, issued to Respondent High Desert EMT, Kalli Tice, is revoked and accepted by the Bureau.

1. 8 The revocation of Respondent's Approval to Operate Institution Code No. 71435217 9 by the Bureau shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with 10 the Bureau. 11

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2. Respondent shall lose all rights and privileges as an Approved Institution in California as of the effective date of the Director's Decision and Order.

3. 14 If Respondent ever files an application for an Approval to Operate in the State of California, the Bureau shall treat it as a new application for Approval to Operate. Respondent 15 must comply with all the laws, regulations and procedures for an Approval to Operate in effect at 16 the time the application or petition is filed, and all of the charges and allegations contained in 17 Accusation No. BPPE22-169 shall be deemed to be true, correct and admitted by Respondent 18 when the Director determines whether to grant or deny the application or petition. 19

4. Respondent shall pay the agency its costs of investigation and enforcement in the 20 amount of \$10,307.96 prior to issuance of a new or reinstated Approval to Operate. 21

5. Submission of Student Tuition Recovery Fund (STRF) Claims: If any student 22 previously enrolled in High Desert EMT is deemed eligible by the Bureau for reimbursement 23 24 through STRF, the Bureau shall notify Respondent and Respondent shall fully reimburse the Bureau within ninety (90) days of notification by the Bureau. The Bureau reserves the right to 25 enforce required STRF reimbursement as if it were a money judgment pursuant to Title 9 26 (commencing with Section 680.010) of Part 2 of the Code of Civil Procedure. 27

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1	6. Respondent understands that if she should ever reapply for a new Approval to
2	Operate with the Bureau, all of the charges contained in Accusation No. BPPE22-169 shall be
3	deemed true correct, and admitted by Respondent for the purpose of any Statement of Issues or
4	any other proceeding seeking to deny or restrict licensure.
5	ACCEPTANCE
6	I have carefully read the Stipulated Revocation of Approval to Operate and Order. I
7	understand the stipulation and the effect it will have on my Approval to Operate Institution Code
8	No. 71435217. I enter into this Stipulated Revocation of Approval to Operate and Order
9	voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the
10	Director of the Department of Consumer Affairs.
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12	DATED: <u>4/30/2023</u> "Original Signature on File"
13	HIGH DESERT EMT, KALLI TICE Respondent
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	Stipulated Revocation of Approval to Operate and Order – RPPE (Case No. RPPE22-169)

1		NDORSEMENT_
2	The foregoing Stipulated Revocatio	n of Approval to Operate and Order is hereby
3	respectfully submitted for consideration b	y the Bureau for Private Postsecondary Education.
4		
5	DATED: May 4, 2023	Respectfully submitted,
6		ROB BONTA
7		Attorney General of California NANCY A. KAISER
8		Supervising Deputy Attorney General
9		"Original Signature on File"
10		LANGSTON M. EDWARDS Deputy Attorney General Attorneys for Complainant
11		Attorneys for Complainant
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Exhibit A

Accusation No. BPPE22-169

1	ROB BONTA Attorney General of California	
2	NANCY A. KAISER	
3	Supervising Deputy Attorney General LANGSTON M. EDWARDS	
4	Deputy Attorney General State Bar No. 237926	
5	300 So. Spring Street, Suite 1702 Los Angeles, CA 90013	
6	Telephone: (213) 269-6371 Facsimile: (916) 731-2126	
7	Attorneys for Complainant	
8	BEFOR	
9	DEPARTMENT OF CO FOR THE BUREAU FOR PRIVATE	
10	STATE OF C.	ALIFORNIA
11		
12	In the Matter of the Accusation Against:	Case No. BPPE22-169
13	HIGH DESERT EMT	
14	12241 Industrial Blvd., #208 Victorville, CA 92395	ACCUSATION
15	mailing address	
16	P.O. Box 2117 Apple Valley, CA 92395	
17	Approval to Operate Institution Code No.	
18	71435217	
19	Respondent.	
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22	PAR	
23		ngs this Accusation solely in her official
24	capacity as the Chief of the Bureau for Private Po	stsecondary Education, Department of
25	Consumer Affairs.	
26		Bureau for Private Postsecondary Education
27	issued Approval to Operate Institution Code No. 7	71435217 to High Desert EMT, owned by Kalli
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I		(HIGH DESERT EMT) ACCUSATION

1	Tice (Respondent). The Approval to Operate was in full force and effect at all times relevant to
2	the charges brought herein and will expire on November 10, 2025, unless renewed.
3	JURISDICTION
4	3. This Accusation is brought before the Director of the Department of Consumer
5	Affairs (Director) for the Bureau for Private Postsecondary Education (Bureau), under the
6	authority of the following laws. All section references are to the Education Code (Code) unless
7	otherwise indicated.
8	4. Business and Professions Code section 118(b) states:
9 10	The suspension, expiration, or forfeiture by operation of law of a license issued by a board in the department, or its suspension, forfeiture, or cancellation by order of the board or by order of a court of law, or its surrender without the written consent of
11	the board of by order of a court of law, of its sufference without the written consent of the board, shall not, during any period in which it may be renewed, restored, reissued, or reinstated, deprive the board of its authority to institute or continue a disciplinary
12	proceeding against the licensee upon any ground provided by law or to enter an order suspending or revoking the license or otherwise taking disciplinary action against the
13	licensee on any such ground.
14	5. Section 94875 of the Code states, in pertinent part:
15 16 17	The bureau shall regulate private postsecondary educational institutions through the powers granted, and duties imposed, by this chapter. In exercising its powers, and performing its duties, the protection of the public shall be the bureau's highest priority. If protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount.
18	6. Section 94932 of the Code states:
19	The bureau shall determine an institution's compliance with the requirements of
20	this chapter. The bureau shall have the power to require reports that institutions shall file with the bureau in addition to the annual report, to send staff to an institution's
21	sites, and to require documents and responses from an institution to monitor compliance. When the bureau has reason to believe that an institution may be out of
22	compliance, it shall conduct an investigation of the institution. If the bureau determines, after completing a compliance inspection or investigation, that an institution has violated any applicable law or regulation, the bureau shall take
23	appropriate action pursuant to this article.
24	STATUTORY PROVISIONS
25	7. Section 94926 of the Code states:
26 27	At least 30 days prior to closing, the institution shall notify the bureau in writing of its intention to close. The notice shall be accompanied by a closure plan, which shall include, but not necessarily be limited to, all of the following:
28	(a) A plan for providing teach-outs of educational programs, including any
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	(HIGH DESERT EMT) ACCUSATION

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1	agreements with any other postsecondary educational institutions to provide teach- outs.
2	(b) If no teach-out plan is contemplated, or for students who do not wish to
3	participate in a teach-out, arrangements for making refunds within 45 days from the date of closure, or for institutions that participate in federal student financial aid
4	programs arrangements for making refunds and returning federal student financial aid program funds.
5 6	(c) If the institution is a participant in federal student financial aid programs, it shall provide students information concerning these programs and institutional closures.
7	(d) A plan for the disposition of student records.
8	8. Section 94927.5 of the Code states:
9	(a) Prior to closing, an institution shall provide the bureau with the following:
10 11	(1) Copies of pertinent student records, including transcripts, in hardcopy or electronic form, as determined by the bureau, pursuant to regulations adopted by the bureau.
12	(2) If the institution is an accredited institution, a plan for the retention of
13	records and transcripts, approved by the institution's accrediting agency, that provides information as to how a student may obtain a transcript or any other information about the student's compared and degrees completed
14	information about the student's coursework and degrees completed.
15 16	(b) Subdivision (a) applies to all private postsecondary institutions, including institutions that are otherwise exempt from this chapter pursuant to Article 4 (commencing with Section 94874).
10	9. Section 94936 of the Code states:
18	(a) As a consequence of an investigation, which may incorporate any materials
19	obtained or produced in connection with a compliance inspection, and upon a finding that the institution has committed a violation of this chapter or that the institution has
20	failed to comply with a notice to comply pursuant to Section 94935, the bureau shall issue a citation to an institution for violation of this chapter, or regulations adopted pursuant to this chapter.
21	(b) The citation may contain any of the following:
22	(1) An order of abatement that may require an institution to demonstrate
23	how future compliance with this chapter or regulations adopted pursuant to this chapter will be accomplished.
24	(2) Notwithstanding Section 125.9 of the Business and Professions Code,
25	an administrative fine not to exceed five thousand dollars (\$5,000) for each violation
26	(c)(1) The citation shall be in writing and describe the nature of the violation
27	and the specific provision of law or regulation that is alleged to have been violated.
28	(2) The citation shall inform the institution of its right to request a hearing
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	(HIGH DESERT EMT) ACCUSAT

1	in writing within 30 days from service of the citation.	
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3	(4) If a hearing is not requested, payment of the administrative fine is due 30 days from the date of service, and shall not constitute an admission of the violation charged.	
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6	REGULATORY PROVISIONS	
7	10. California Code of Regulations, title 5, section 74000 subdivision (e)(1) states that	
8	"[i]f an institution fails to pay any fee and any penalty fees timely, the Bureau may initiate	
9	proceedings to revoke the institution's approval to operate for failure to pay fees."	
10	11. California Code of Regulations, title 5, section 75020 states:	
11	(a) The Bureau Chief, or his or her designee, or the Director's designee, is authorized	
12	to issue citations containing orders of abatement and/or administrative fines pursuant to section 94936 of the Code against approved private, postsecondary institutions that have	
13	committed any acts or omissions that are in violation of the Act or any regulation adopted pursuant thereto.	
14	(b) The Bureau Chief, or his or her designee, or the Director's designee, is authorized	
15 16	to issue citations containing orders of abatement and administrative fines not to exceed \$100,000 pursuant to section 94944 of the Code against persons who are without proper approval to operate a private, postsecondary institution. In addition, the citation may	
17	contain an order of abatement pursuant to section 149 of the Business and Professions Code that requires the unapproved person to cease any unlawful advertising and to notify the telephone company furnishing services to the cited person: (1) to disconnect the telephone services furnished to any telephone number contained in the unlawful advertising, and (2) that subsequent calls to that number shall not be referred by the telephone company to any new number obtained by that person. The provisions of section 75040 shall apply to this subsection.	
18 19		
20	(c) In addition to the requirements of section 94936 of the Code, each citation shall inform the cited institution or person that:	
21	(1) if a hearing pursuant to the Administrative Procedure Act (APA) is not	
22 23	requested, payment of the administrative fine is due 30 days from the date of service, and shall not constitute an admission of the violation charged.	
23 24	(2) if a hearing pursuant to the APA is conducted and payment of an administrative fine is ordered, the administrative fine is due 30 days from when the	
25	order is effective;	
26	(3) if the cited institution or person desires an informal conference to contest the finding of a violation prior to an APA hearing, the informal conference shall be	
27	requested by written notice to the Bureau within 30 days from service of the citation;	
28	(4) failure to comply with any order of abatement within the time set forth in the citation, unless the citation is being appealed, may result in disciplinary action being	
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	(HIGH DESERT EMT) ACCUSATION	

1	taken by the Bureau; and
2	(5) the Bureau may enforce the administrative fine as if it were a money judgment pursuant to the California Code of Civil Procedure (beginning with section
3	680.010).
4	(d) Each citation shall be served on the cited institution or person, in person, or by certified and regular mail at the address of record on file with the Bureau. Citations served by certified and regular mail shall be deemed "served" on the date of mailing.
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6	(e) The sanction authorized under this section shall be separate from, and in addition to, any civil, criminal, or other administrative remedies.
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8	12. California Code of Regulations, title 5, section 75030 states:
9	Where citations pursuant to section 94936 of the Code and section 75020, subsection (a) include an assessment of an administrative fine, the fine shall be not less than \$50 or
10	exceed \$5,000 for each violation. Each violation shall be classified according to the nature of the violation and shall indicate the classification on the face thereof as follows:
11	(a) A "Class A" violation shall not be less than \$2,501 nor more than \$5,000. A
12	Class A violation is one that the Bureau has, in its discretion, determined to be more serious in nature, deserving the maximum fine. A Class A violation may, in the Bureau's
13	discretion, be issued to an institution that has committed one or more prior separate Class B violations.
14	(b) A "Class B" violation shall not be less than \$1,001 nor more than \$2,500. A
15 16	Class B violation is one that the Bureau has, in its discretion, determined to be less serious in nature and may include, but is not limited to, a violation that could have resulted in student harm. Typically some degree of mitigation will exist. A Class B violation may be
17	issued to an institution that has committed one or more prior separate Class C violations.
18 19	(c) A "Class C" violation shall not be less than \$501 nor more than \$1,000. A Class C violation is one that the Bureau has, in its discretion, determined to be a minor or technical violation, which may be directly or potentially detrimental to students or potentially impacts their education.
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20	(d) A "Class D" violation shall not be less than \$50 nor more than \$500. A Class D violation is one that the Bureau has, in its discretion, determined to be a minor or technical violation, which is neither directly or potentially detrimental to students nor potentially
22	impacts their education.
23	13. California Code of Regulations, title 5, section 75040 states in relevant part:
24	(a) Pursuant to section 94936(c)(2) of the Code, a cited institution or person may,
25	within 30 days of service of the citation, request a hearing in writing to the Bureau, or it is waived. In addition to contesting a citation by requesting a hearing, the cited institution or person may within the same 30 days, submit a written request to the Bureau for an informal
26	person may, within the same 30 days, submit a written request to the Bureau for an informal conference.
27	(b) The Bureau Chief, or his or her designee, or the Director, or his or her designee,
28	shall within 30 days from the Bureau's receipt of a written request for an informal conference, hold an informal conference with the cited institution or person. The 30-day
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	(HIGH DESERT EMT) ACCUSATION

period may be extended by the Bureau Chief or the Director for good cause. The informal 1 conference may be, by telephone. 2 (c) Following the informal conference, the Bureau Chief, or his or her designee, or the Director, or his or her designee, will affirm, modify, or dismiss the citation, including 3 any fine assessed and/or order of abatement issued. A written order affirming, modifying, or dismissing the original citation shall be served on the cited institution or person within 30 4 days from the informal conference. If the order affirms or modifies the original citation, said order shall fix a reasonable period of time for abatement of the violation and/or 5 payment of the fine of not more than 30 days. 6 (d) If the informal conference results in the modification of the findings of violation(s), the amount of the fine and/or the order of abatement, the citation shall be 7 considered modified, but not withdrawn. Unless waived, a cited institution or person is entitled to a hearing to contest the modified citation if the institution or person filed a timely 8 request, but is not entitled to an informal conference to contest an affirmed or modified citation. If a timely request for a hearing was not filed, the decision on the affirmed or 9 modified citation shall be considered final. 10 11 (g) If a written request for a hearing pursuant to section 94936(c)(2) of the Code, or for an informal conference as provided in subsection (a), or both, is not submitted to the 12 Bureau within 30 days from service of the citation, the cited institution or person is deemed to have waived the right to an informal conference and/or administrative hearing. 13 14. California Code of Regulations, title 5, section 75050 states in relevant part: 14 15 . . . 16 (b) Failure of an applicant or institution issued an approval to operate to abate the violation or to pay the fine within the time allowed is a ground for denial or discipline of an 17 approval to operate. 18 . . . 19 15. California Code of Regulations, title 5, section 75100 provides that the Bureau may suspend, revoke or place on probation with terms and conditions an approval to operate. 20 16. California Code of Regulations, title 5, section 76130 subdivision states in pertinent 21 part: 22 23 (b) A qualifying institution shall complete the STRF Assessment report and remit it with the STRF assessments collected from students to be received by the 24 Bureau no later than the last day of the month following the close of the quarter as follows: 25 (1) April 30 for the first quarter, 26 (2) July 31 for the second quarter, 27 (3) October 31 for the third quarter, and 28 6

1 2	(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.
3	17. California Code of Regulations, title 5, section 76240 states:
4	All institutions, including those exempt from Bureau regulation pursuant to the Code, shall do the following prior to closing:
5 6	(a) At least 30 days prior to closing, the institution shall notify the Bureau in
7	writing of its intention to close and provide a closure plan. The closure plan shall include:
8	(1) The exact date and reason for the closure.
9	(2) The last date of instruction for each educational service or program.
10	(3) A list of students who were enrolled at any time during the 60 days prior to closure.
11	(4) If any student will not be provided complete educational services or the educational program, the institution shall provide:
12 13	(A) A plan for providing teach-outs or transfers, including the details of any agreements with other institutions.
14 15	(B) If no teach-out is contemplated, or for students who do not wish to participate in a teach-out, arrangements for making refunds within 45 days from the date of closure, or for institutions that participate in federal student financial aid programs arrangements for making refunds and returning federal student
16	financial aid program funds.
17	(5) A plan for the disposition of student records.
18 19	(6) A plan to notify students of their rights and options under the Act and this chapter.
20	(b) The institution shall notify the students of the following:
21	(1) If the institution is a participant in federal student financial aid programs, it shall provide students information concerning those programs and institutional closures.
22	(2) If any student will not be provided complete educational services or the
23	educational program, information regarding the Student Tuition Recovery Fund and the Bureau's physical and Internet addresses.
24 25	COST RECOVERY
	18. Business and Professions Code section 125.3 and Section 94937, subdivision (c)
26 27	provide, in part, that the Bureau may request the administrative law judge to direct a licensee
27	found to have committed a violation or violations of the licensing act to pay a sum not to exceed
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	(HIGH DESERT EMT) ACCUSATION

1	the reasonable costs of the investigation and enforcement of the case, with failure of the licensee
2	to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of
3	investigation and enforcement costs may be included in a stipulated settlement.
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5	FACTUAL ALLEGATIONS
6	Citation No. 2122134
7	19. On March 28, 2022, the Bureau issued Citation No. 2122134 to the Respondent for
8	failure to submit Student Tuition Recovery Fund (STRF) Assessment Reporting Forms for the
9	first, second and third quarters of 2021 and failure to pay its 2021 Annual Fee.
10	20. The Citation ordered Respondent to submit the delinquent first, second and third
11	quarters of 2021 STRF and 2021 Annual Fee and all late payment penalty fees. An administrative
12	fine of \$100.00 was issued for this Citation. The Citation was not appealed.
13	21. Respondent failed to submit payment of the Administrative Fine of \$100.00 and
14	comply with the Order of Abatement to submit the delinquent first, second, and third quarter 2021
15	STRF Assessment Reporting Forms and 2021 Annual Fee and late payment penalty fees for
16	Citation No. 2122134.
17	<i>Citation No. 2021238</i>
18	22. On April 22, 2021, the Bureau issued Citation No. 2021238 to the Respondent for
19	failure to submit STRF Assessment Reporting Forms for the fourth quarter of 2020 and failure to
20	pay its 2020 Annual Fee. Accordingly, a 90 day late payment penalty was also assessed.
21	23. On January 4, 2022, the Bureau informed Respondent that it had received the fourth
22	quarter 2020 STRF Assessement Reporting Form but had not received the 2020 Annual Fees and
23	90 day late payment penalty fee and that both were due by January 18, 2022.
24	24. On January 20, 2022, Respondent represented that the 2020 Annual Fee and 90 day
25	late payment penalty would be delivered to the Bureau by "overnight" mail.
26	25. On February 17, 2022, the Bureau informed Respondent that the 2020 Annual Fees
27	and late payment penalty fees were still outstanding and had not been delivered overnight, as
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	(HIGH DESERT EMT) ACCUSATION

1	represented. The Bureau extended one last extension for Respondent to submit the payments, "by
2	Friday, February 25, 2022."
3	26. Respondent failed to submit the remaining Order of Abatement of the 2020 Annual
4	Fee and late payment penalty fees for Citation No. 2021238
5	Consumer Complaints
6	27. On July 30, 2022, the Bureau received a complaint from A.Q. who stated that on July
7	6, 2021, he enrolled in Respondent's Emergency Medical Technician – Basic (EMT-B)
8	Certification class. ¹
9	28. Prior to enrolling, Respondent informed A.Q. that he would have 12 months to
10	complete the course, which included completing 32 chapters of online material, calling to set up
11	in-class instruction and final testing in order to receive certification.
12	29. At the end of June 2022, after completing the online portion of the course, A.Q.
13	called Respondent to set up in-class instruction but only reached Respondent's voicemail.
14	30. A.Q. subsequently made numerous but unsuccessful attempts to reach Respondent,
15	including sending text messages, emails, calling repeatedly and driving to the physical campus,
16	but received no response. As a result, A.Q. has not received EMT-B Certification.
17	31. A.Q. paid \$795 for the course and \$94.00 for the course materials for a total of
18	\$889.99.
19	32. On August 19, 2022, the Bureau received a complaint from A.F. who stated that on
20	September 8, 2021, he enrolled in Respondent's EMT-B Certification class.
21	33. Prior to enrolling, Respondent informed A.F. that he would have 12 months to
22	complete the course, which included completing 32 chapters of online material, calling to set up
23	in-class instruction and final testing in order to receive certification.
24	34. On or around August 9, 2022, after completing the online portion of the course, A.F.
25	called Respondent to set up in-class instruction but only reached Respondent's voicemail.
26	///
27	///
28	¹ Initials are used here and throughout to protect consumer confidentiality.
	9
	(HIGH DESERT EMT) ACCUSATION

1	35. A.F. subsequently made numerous but unsuccessful attempts to reach Respondent,		
2	including sending text messages, emails, calling repeatedly and driving to the physical campus,		
3	but received no response. As a result, A.F. has not received EMT-B Certification.		
4	36. A.F. paid \$795 for the course and \$94.00 for the course materials for a total of		
5	\$889.99.		
6	37. On August 29, 2022, the Bureau received a complaint from Inland Counties		
7	Emergency Medical Agency (ICEMA) reporting that Respondent's EMT training program		
8	approval was revoked and that "the school is no longer active."		
9	38. On August 29, 2022, ICEMA notified Respondent that the EMT training program		
10	was revoked and informed Respondent of student complaints filed with ICEMA on June 22, 2022		
11	and July 6, 2022, respectively, regarding school closure after students paid tuition for online		
12	classes.		
13	39. ICEMA has not been able to contact Respondent after "several attempts by phone, in		
14	person and via email."		
15	FIRST CAUSE FOR DISCIPLINE		
16	(Failure to Comply with Citation)		
17	40. Respondent has subjected its Approval to Operate to disciplinary action under Code		
18	section 94936 and California Code of Regulations, title 5, section 75050, subdivision (b), in that		
19	Respondent failed to comply with the Orders of Abatement to submit the delinquent first, second		
20	and third quarters of 2021 STRF and pay its 2021 Annual Fee and late payment penalty fees, as		
21	well as the Administrative Fine of \$100.00 in Citation 2122134. Complainant hereby incorporates		
22	paragraphs 19–21 above as though set forth in full herein.		
23	SECOND CAUSE FOR DISCIPLINE		
24	(Failure to Comply with Citation)		
25	41. Respondent has subjected its Approval to Operate to disciplinary action under Code		
26	section 94936 and California Code of Regulations, title 5, section 75050, subdivision (b), in that		
27	Respondent failed to comply with the Order of Abatement to submit the outstanding 2020 Annual		
28			
	10		
	(HIGH DESERT EMT) ACCUSATION		

1	Fee and late payment penalty fees for Citation No. 2021238. Complainant hereby incorporates			
2	paragraphs 22 and 23 above as though set forth in full herein.			
3	THIRD CAUSE FOR DISCIPLINE			
4	(Failure to Complete STRF Assessment Report and Remit Assessments)			
5	42. Respondent has subjected its Approval to Operate to disciplinary action under Code			
6	section 94936 and California Code of Regulations, title 5, sections 74000, subdivision (e)(1) and			
7	76130, subdivision (b), in that Respondent failed complete the STRF Assessment Reporting			
8	Forms and remit with the STRF assessments collected from students as required for the following			
9	quarters: 4th Quarter 2021, 1 st Quarter 2022, 2 nd Quarter 2022, 3 rd Quarter 2022 and 4 th Quarter			
10	2022.			
11	FOURTH CAUSE FOR DISCIPLINE			
12	(Failure to Comply with Procedures Prior Closing)			
13	43. Respondent has subjected its Approval to Operate to disciplinary action under Code			
14	section 94926 and California Code of Regulations, title 5, section 76240, in that Respondent			
15	failed to comply with required procedures prior to closing, which includes but is not limited to			
16	providing the required notices and teach out plans. Complainant incorporates paragraphs $24 - 36$			
17	by reference as if fully set forth herein.			
18	FIFTH CAUSE FOR DISCIPLINE			
19	(Failure to Provide Records to the Bureau Prior to Closing)			
20	44. Respondent has subjected its Approval to Operate to disciplinary action under Code			
21	section 94927.5, in that Respondent failed provide the Bureau with pertinent student records,			
22	including transcripts and a plan for the retention of records and transcripts, prior to closing.			
23	Complainant incorporates paragraphs $27 - 39$ by reference as if fully set forth herein.			
24	SIXTH CAUSE FOR DISCIPLINE			
25	(Failure to Pay Annual Fee)			
26	45. Respondent subjected its approval to operate to disciplinary action pursuant to			
27	California Code of Regulations, title 5, section 74000(e), for failing to pay its annual fees for the			
28	year 2022.			
	11			
	(HIGH DESERT EMT) ACCUSATION			

1	PRAYER			
2	WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,			
3	and that following the hearing, the Director of the Department of Consumer Affairs issue a			
4	decision:			
5	1. Revoking or suspending Approval to Operate Institution Code Number 71435217,			
6	issued to High Desert EMT, Kalli Tice;			
7	2. Ordering High Desert EMT, owned by Kallie Tice, to pay the Bureau for Private			
8	Postsecondary Education the reasonable costs of the investigation and enforcement of this case,			
9	pursuant to Business and Professions Code section 125.3; and,			
10	3.	Taking such other and further action as deemed necessary and proper.		
11				
12		2/2/2023 "Original Signature on File"		
13	DATED.	DEBORAH COCHRANE Chief		
14		Bureau for Private Postsecondary Education		
15		Department of Consumer Affairs State of California		
16		Complainant		
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	I	(HIGH DESERT EMT) ACCUSATION		