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8 **BEFORE THE**
DEPARTMENT OF CONSUMER AFFAIRS
9 **FOR THE BUREAU FOR PRIVATE POSTSECONDARY EDUCATION**
STATE OF CALIFORNIA

10
11 In the Matter of the Statement of Issues
Against:

Case No. 1000444

12 **LOS ANGELES INSTITUTE OF**
13 **TRANSLATION AND**
14 **INTERPRETATION; JUNHUI JOO-PARK**

STATEMENT OF ISSUES

15 **Approval to Operate an Institution Non-**
Accredited Applicant

16 Respondent.

17
18
19 Complainant alleges:

20 **PARTIES**

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

24 2. On or about March 23, 2004, the Bureau for Private Postsecondary Education
25 received an application for an Approval to Operate an Institution Non-Accredited from Los
26 Angeles Institute of Translation and Interpretation; Junhui Joo-Park (Respondent). On or about
27 February 21, 2004, Junhui Joo-Park certified under penalty of perjury to the truthfulness of all
28

1 statements, answers, and representations in the application. The Bureau denied the application on
2 February 25, 2015.

3 JURISDICTION

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

8 4. Business and Professions Code, section 480 states:

9 "(a) A board may deny a license regulated by this code on the grounds that the applicant has
10 one of the following:

11 "...

12 "(3) (A) Done any act that if done by a licentiate of the business or profession in question,
13 would be grounds for suspension or revocation of license.

14 5. Section 22 of the Business and Professions Code states:

15 "Board", as used in any provision of this code, refers to the board in which the
16 administration of the provision is vested, and unless otherwise expressly provided, shall include
17 "bureau", "commission," "committee," "department," " division," "examining committee,"
18 "program," and "agency."

19 6. Section 94885 of the Education Code¹ states:

20 (a) "The bureau shall adopt by regulation minimum operating standards for an institution
21 that shall reasonably ensure that all of the following occur:

22 "(1) The content of each educational program can achieve its stated objective.

23 "(2) The institution maintains specific written standards for student admissions for each
24 educational program and those standards are related to the particular educational program.

25 "(3) The facilities, instructional equipment, and materials are sufficient to enable students
26 to achieve the educational program's goals.

27 _____
28 ¹ California Private Postsecondary Education Act of 2009, Ed. Code §§ 94800 et seq.

1 “(4) The institution maintains a withdrawal policy and provides refunds.

2 “(5) The directors, administrators, and faculty are properly qualified.

3 “(6) The institution is financially sound and capable of fulfilling its commitments to
4 students.

5 “(7) That, upon satisfactory completion of an educational program, the institution gives
6 students a document signifying the degree or diploma awarded.

7 “(8) Adequate records and standard transcripts are maintained and are available to
8 students.

9 “(9) The institution is maintained and operated in compliance with this chapter and all
10 other applicable ordinances and laws.

11 “(b) Except as provided in Section 94855.1, an institution offering a degree must satisfy one
12 of the following requirements:

13 “(i) Accreditation by an accrediting agency recognized by the United States Department
14 of Education, with the scope of that accreditation covering the offering of at least one degree
15 program by the institution.

16 “(ii) An accreditation plan, approved by the bureau, for the institution to become fully
17 accredited within five years of the bureau's issuance of a provisional approval to operate to the
18 institution. The provisional approval to operate to an unaccredited degree-offering institution
19 shall be in compliance with Section 94885.5.”

20 7. Section 94886 of the Education Code states:

21 “Except as exempted in Article 4 (commencing with Section 94874) or in compliance with
22 the transition provisions in Article 2 (commencing with Section 94802), a person shall not open,
23 conduct, or do business as a private postsecondary educational institution in this state without
24 obtaining an approval to operate under this chapter.”

25 8. Section 94887 of the Education Code states:

26 “An approval to operate shall be granted only after an applicant has presented sufficient
27 evidence to the bureau, and the bureau has independently verified the information provided by the
28 applicant through site visits or other methods deemed appropriate by the bureau, that the applicant

1 has the capacity to satisfy the minimum operating standards. The bureau shall deny an application
2 for an approval to operate if the application does not satisfy those standards.”

3 9. Section 94894 of the Education Code States:

4 “The following changes to an approval to operate are considered substantive changes and
5 require prior authorization:”

6 “(a) A change in educational objectives, including an addition of a new diploma or a degree
7 educational program unrelated to the approved educational programs offered by the institution.

8 “(b) A change in ownership.

9 “(c) A change in control.

10 “(d) A change in business organization form.

11 “(e) A change of location.

12 “(f) A change of name.

13 “(g) A significant change in the method of instructional delivery.

14 “(h) An addition of a separate branch more than five miles from the main or branch
15 campus.”

16 10. Section 94911 of the Education Code states:

17 "An enrollment agreement shall include, at a minimum, all of the following:

18 "(a) The name of the institution and the name of the educational program, including the
19 total number of credit hours, clock hours, or other increment required to complete the educational
20 program.

21 "(b) A schedule of total charges, including a list of any charges that are nonrefundable and
22 the student's obligations to the Student Tuition Recovery Fund, clearly identified as
23 nonrefundable charges.

24 "(c) In underlined capital letters on the same page of the enrollment agreement in which the
25 student's signature is required, the total charges for the current period of attendance, the estimated
26 total charges for the entire educational program, and the total charges the student is obligated to
27 pay upon enrollment.

28

1 "(d) A clear and conspicuous statement that the enrollment agreement is legally binding
2 when signed by the student and accepted by the institution.

3 "(e) (1) A disclosure with a clear and conspicuous caption, 'STUDENT'S RIGHT TO
4 CANCEL,' under which it is explained that the student has the right to cancel the enrollment
5 agreement and obtain a refund of charges paid through attendance at the first class session, or the
6 seventh day after enrollment, whichever is later.

7 "(2) The disclosure shall contain the institution's refund policy and a statement that, if the
8 student has received federal student financial aid funds, the student is entitled to a refund of
9 moneys not paid from federal student financial aid program funds.

10 "(3) The text shall also include a description of the procedures that a student is required to
11 follow to cancel the enrollment agreement or withdraw from the institution and obtain a refund.

12 "(f) A statement specifying that, if the student obtains a loan to pay for an educational
13 program, the student will have the responsibility to repay the full amount of the loan plus interest,
14 less the amount of any refund.

15 "(g) A statement specifying that, if the student is eligible for a loan guaranteed by the
16 federal or state government and the student defaults on the loan, both of the following may occur:

17 "(1) The federal or state government or a loan guarantee agency may take action against the
18 student, including applying any income tax refund to which the person is entitled to reduce the
19 balance owed on the loan.

20 "(2) The student may not be eligible for any other federal student financial aid at another
21 institution or other government assistance until the loan is repaid.

22 "(h) The transferability disclosure that is required to be included in the school catalog, as
23 specified in paragraph (15) of subdivision (a) of Section 94909.

24 "(i) (1) The following statement: 'Prior to signing this enrollment agreement, you must be
25 given a catalog or brochure and a School Performance Fact Sheet, which you are encouraged to
26 review prior to signing this agreement. These documents contain important policies and
27 performance data for this institution. This institution is required to have you sign and date the
28 information included in the School Performance Fact Sheet relating to completion rates,

1 placement rates, license examination passage rates, and salaries or wages, prior to signing this
2 agreement.'

3 "(2) Immediately following the statement required by paragraph (1), a line for the student to
4 initial, including the following statement: 'I certify that I have received the catalog, School
5 Performance Fact Sheet, and information regarding completion rates, placement rates, license
6 examination passage rates, and salary or wage information included in the School Performance
7 Fact sheet, and have signed, initialed, and dated the information provided in the School
8 Performance Fact Sheet.'

9 "(j) The following statements:

10 "(1) 'Any questions a student may have regarding this enrollment agreement that have not
11 been satisfactorily answered by the institution may be directed to the Bureau for Private
12 Postsecondary Education at (address), Sacramento, CA (ZIP Code), (Internet Web site address),
13 (telephone and fax numbers).'

14 "(2) 'A student or any member of the public may file a complaint about this institution with
15 the Bureau for Private Postsecondary Education by calling (toll-free telephone number) or by
16 completing a complaint form, which can be obtained on the bureau's Internet Web site (Internet
17 Web site address).'

18 "(k) The following statement above the space for the student's signature: 'I understand that
19 this is a legally binding contract. My signature below certifies that I have read, understood, and
20 agreed to my rights and responsibilities, and that the institution's cancellation and refund policies
21 have been clearly explained to me.'"

22 11. Section 94897 of the Education Code states:

23 "An institution shall not do any of the following:

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

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

27 ...

28

1 “(1) Use the terms "approval," "approved," "approval to operate," or "approved to operate"
2 without stating clearly and conspicuously that approval to operate means compliance with state
3 standards as set forth in this chapter. If the bureau has granted an institution approval to operate,
4 the institution may indicate that the institution is "licensed" or "licensed to operate," but may not
5 state or imply either of the following:

6 “(1) The institution or its educational programs are endorsed or recommended by the state
7 or by the bureau.

8 “(2) The approval to operate indicates that the institution exceeds minimum state standards
9 as set forth in this chapter.

10 ...

11 “(p) Offer an associate, baccalaureate, master's, or doctoral degree without disclosing to
12 prospective students prior to enrollment whether the institution or the degree program is
13 unaccredited and any known limitation of the degree, including, but not limited to, all of the
14 following:

15 “(1) Whether a graduate of the degree program will be eligible to sit for the applicable
16 licensure exam in California and other states.

17 “(2) A statement that reads: "A degree program that is unaccredited or a degree from an
18 unaccredited institution is not recognized for some employment positions, including, but not
19 limited to, positions with the State of California."

20 “(3) That a student enrolled in an unaccredited institution is not eligible for federal financial
21 aid programs.”

22 12. Section 94906 of the Education Code states:

23 “(a) An enrollment agreement shall be written in language that is easily understood. If
24 English is not the student's primary language, and the student is unable to understand the terms
25 and conditions of the enrollment agreement, the student shall have the right to obtain a clear
26 explanation of the terms and conditions and all cancellation and refund policies in his or her
27 primary language.

28

1 “(b) If the recruitment leading to enrollment was conducted in a language other than
2 English, the enrollment agreement, disclosures, and statements shall be in that language.”

3 13. “Section 94909 of the Education Code states:

4 “(a) Except as provided in subdivision (d), prior to enrollment, an institution shall provide a
5 prospective student, either in writing or electronically, with a school catalog containing, at a
6 minimum, all of the following:

7 “(2) Except as specified in Article 2 (commencing with Section 94802), a statement that the
8 institution is a private institution and that it is approved to operate by the bureau.

9 “...

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

15 “...

16 “(7) Information regarding the faculty and their qualifications.

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

18 “(A) Admissions policies, including the institution's policies regarding the acceptance of
19 credits earned at other institutions or through challenge examinations and achievement tests,
20 admissions requirements for ability-to-benefit students, and a list describing any transfer or
21 articulation agreements between the institution and any other college or university that provides
22 for the transfer of credits earned in the program of instruction. If the institution has not entered
23 into an articulation or transfer agreement with any other college or university, the institution shall
24 disclose that fact.

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

1 “(10) A statement reporting whether the institution participates in federal and state
2 financial aid programs, and if so, all consumer information that is required to be disclosed to the
3 student pursuant to the applicable federal and state financial aid programs.

4 ...

5 “(12) A statement specifying whether the institution has a pending petition in bankruptcy, is
6 operating as a debtor in possession, has filed a petition within the preceding five years, or has had
7 a petition in bankruptcy filed against it within the preceding five years that resulted in
8 reorganization under Chapter 11 of the United States Bankruptcy Code (11 U.S.C. Sec. 1101 et
9 seq.).

10 ...

11 “(15) The following statement:

12 **"NOTICE CONCERNING TRANSFERABILITY OF CREDITS AND CREDENTIALS**
13 **EARNED AT OUR INSTITUTION**

14 “The transferability of credits you earn at (name of institution) is at the complete discretion
15 of an institution to which you may seek to transfer. Acceptance of the (degree, diploma, or
16 certificate) you earn in (name of educational program) is also at the complete discretion of the
17 institution to which you may seek to transfer. If the (credits or degree, diploma, or certificate) that
18 you earn at this institution are not accepted at the institution to which you seek to transfer, you
19 may be required to repeat some or all of your coursework at that institution. For this reason you
20 should make certain that your attendance at this institution will meet your educational goals. This
21 may include contacting an institution to which you may seek to transfer after attending (name of
22 institution) to determine if your (credits or degree, diploma, or certificate) will transfer."

23 “(16) A statement specifying whether the institution, or any of its degree programs, are
24 accredited by an accrediting agency recognized by the United States Department of Education. If
25 the institution is unaccredited and offers an associate, baccalaureate, master's, or doctoral degree,
26 or is accredited and offers an unaccredited program for an associate, baccalaureate, master's, or
27 doctoral degree, the statement shall disclose the known limitations of the degree program,
28 including, but not limited to, all of the following:

1 “(A) Whether a graduate of the degree program will be eligible to sit for the applicable
2 licensure exam in California and other states.

3 “(B) A degree program that is unaccredited or a degree from an unaccredited institution is
4 not recognized for some employment positions, including, but not limited to, positions with the
5 State of California.

6 “(C) That a student enrolled in an unaccredited institution is not eligible for federal
7 financial aid programs.

8 “(b) If the institution has a general student brochure, the institution shall provide that
9 brochure to the prospective student prior to enrollment. In addition, if the institution has a
10 program-specific student brochure for the program in which the prospective student seeks to
11 enroll, the institution shall provide the program-specific student brochure to the prospective
12 student prior to enrollment.

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

16 “(d) An accredited institution is not required to provide a School Performance Fact Sheet to
17 a prospective student who is not a California resident, not residing in California at the time of his
18 or her enrollment, and enrolling in an accredited distance learning degree program offered by the
19 institution, if the institution complies with all federal laws, the applicable laws of the state where
20 the student is located, and other appropriate laws, including, but not limited to, consumer
21 protection and student disclosure requirements.”

22 14. Section 94910 of the Education Code states:

23 “Except as otherwise provided in subdivision (d) of section 94909 and section 94910.5,
24 Prior to enrollment, an institution shall provide a prospective student with a School Performance
25 Fact Sheet containing, at a minimum, the following information, as it relates to the educational
26 program:

27 “(a) Completion rates, as calculated pursuant to Article 16 (commencing with Section
28 94928).

1 "(b) Placement rates, for each education program, as calculated pursuant to Article 16
2 (commencing with Section 94928), if the educational program is designed to lead to, or the
3 institution makes any express or implied claim related to preparing students for, a particular
4 career, occupation, vocation, job, or job title.

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

8 "(d) Salary or wage information, as calculated pursuant to Article 16 (commencing with
9 Section 94928).

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

16 "(f) All of the following:

17 "(1) A description of the manner in which the figures described in subdivisions (a) to (d),
18 inclusive, are calculated or a statement informing the reader of where he or she may obtain a
19 description of the manner in which the figures described in subdivisions (a) to (d), inclusive, are
20 calculated.

21 "(2) A statement informing the reader of where he or she may obtain from the institution a
22 list of the employment positions determined to be within the field for which a student received
23 education and training for the calculation of job placement rates as required by subdivision (b).

24 "(3) A statement informing the reader of where he or she may obtain from the institution a
25 list of the objective sources of information used to substantiate the salary disclosure as required
26 by subdivision (d).

27 "(g) The following statements:
28

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

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

9 "..."

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

13 "(i) Data and information disclosed pursuant to subdivisions (a) to (d), inclusive, is not
14 required to include students who satisfy the qualifications specified in subdivision (d) of Section
15 94909, but an institution shall disclose whether the data, information, or both provided in its fact
16 sheet excludes students pursuant to this subdivision. An institution shall not actively use data
17 specific to the fact sheet in its recruitment materials or other recruitment efforts of students who
18 are not California residents and do not reside in California at the time of their enrollment."

19 15. Section 94913 of the Education Code states:

20 "(a) An institution that maintains an Internet Web site shall provide on that Internet Web
21 site all of the following:

22 "(1) The school catalog.

23 "(2) A School Performance Fact Sheet for each educational program offered by the
24 institution.

25 "(3) Student brochures offered by the institution.

26 "(4) A link to the bureau's Internet Web site.

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

28

1 Application 94886 (rev. 2/10). An applicant seeking approval to operate by accreditation pursuant
2 to Section 94890(a)(1) of the Code shall comply with section 71390.

3 “(b) An applicant shall submit the completed form, the information or documentation
4 required by this Article, the appropriate application fee as provided in Section 94930.5(a)(1) of
5 the Code, and any appropriate annual fee as required by Article 1 of Chapter 5 of this Division, to
6 the Bureau.

7 “(c) An application that fails to contain all of the information required by this article shall
8 render it incomplete.

9 18. Section 71770 subdivision (a) of title 5 of the California Code of Regulations states:

10 “Admissions Standards and Transferred Credits Policy.”

11 “(a) The institution shall establish specific written standards for student admissions for each
12 educational program. These standards shall be related to the particular educational program. An
13 institution shall not admit any student who is obviously unqualified or who does not appear to
14 have a reasonable prospect of completing the program. In addition to any specific standards for an
15 educational program, the admissions standards must specify as applicable that:

16 ...

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

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

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

28

1 “(A) Units earned at institutions approved by the Bureau, public or private institutions
2 of higher learning accredited by an accrediting association recognized by the U. S. Department of
3 Education, or any institution of higher learning, including foreign institutions, if the institution
4 offering the undergraduate program documents that the institution of higher learning at which the
5 units were earned offers degree programs equivalent to degree programs approved by the Bureau
6 or accredited by an accrediting association recognized by the U.S. Department of Education;

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

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

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

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

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

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

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

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

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

26 “(3) Each college or university level learning experience shall be evaluated by faculty
27 qualified in that specific subject area who shall ascertain (1) to what college or university level
28

1 learning the student's prior experience is equivalent and (2) how many credits toward a degree
2 may be granted for that experience.

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

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

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

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

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

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

17 “(6) The amount of credit awarded for prior experiential learning shall not be related to the
18 amount charged the student for the assessment process.

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

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

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

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

1 “(E) No credit for experiential learning may be awarded after a student has obtained
2 60 semester credits in a graduate program.”

3 19. Section 71800 of title 5 of the California Code of Regulations states:

4 “(In addition to the requirements of section 94911 of the Code, an institution shall provide to
5 each student an enrollment agreement that contains at the least the following information:

6 “(a) The name and address of the institution and the addresses where instruction will be
7 provided.

8 ...

9 “(d) Date by which the student must exercise his or her right to cancel or withdraw, and the
10 refund policy, including any alternative method of calculation if approved by the Bureau pursuant
11 to section 94921 of the Code.”

12 “(e) Itemization of all institutional charges and fees including, as applicable:

13 “(1) tuition;

14 “(2) registration fee (non-refundable);

15 “(3) equipment;

16 “(4) lab supplies or kits;

17 “(5) Textbooks, or other learning media;

18 “(6) uniforms or other special protective clothing;

19 “(7) in-resident housing;

20 “(8) tutoring;

21 “(9) assessment fees for transfer of credits;

22 “(10) fees to transfer credits;

23 “(11) Student Tuition Recovery Fund fee (non-refundable);

24 “(12) any other institutional charge or fee.”

25 “...”

26 20. Section 71810 of title 5 of the California Code of Regulations states:

27 “(a) Each institution shall provide a catalog pursuant to section 94909 of the Code, which
28 shall be updated annually. Annual updates may be made by the use of supplements or inserts

1 accompanying the catalog. If changes in educational programs, educational services, procedures,
2 or policies required to be included in the catalog by statute or regulation are implemented before
3 the issuance of the annually updated catalog, those changes shall be reflected at the time they are
4 made in supplements or inserts accompanying the catalog.

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

7 ...

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

10 “(3) If the institution admits students from other countries, whether visa services are
11 provided or whether the institution will vouch for student status, and any associated charges;

12 “(4) Language proficiency information, including:

13 “(A) the level of English language proficiency required of students and the kind of
14 documentation of proficiency, such as the Test of English as a Foreign Language (TOEFL), that
15 will be accepted; and

16 “(B) whether English language services, including instruction such as ESL, are provided
17 and, if so, the nature of the service and its cost;

18 ...

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

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

24 21. Section 71865 subdivisions (a) and (e) of title 5 of the California Code of Regulations
25 states:

26 “(a) A Master's degree may only be awarded to a student who demonstrates at least the
27 achievement of learning in a designated major field that is equivalent in depth to that normally
28

1 acquired in a minimum of 30 semester credits or its equivalent or one year of study beyond the
2 Bachelor's degree.”

3 ...

4 “(e) Dissertations, theses and other products submitted by a student as part of a graduate
5 program shall be signed by all faculty members recommending the student for an award of a
6 degree.”

7 22. Section 74110 of title 5 of the California Code of Regulations states:

8 “(a) The annual report required by Section 94934 of the Code shall include the information
9 required by section 94934 for all educational programs offered in the prior calendar year.

10 “(b) In addition to the information required by section 94934 provided under penalty of
11 perjury, the institution shall have annual financial statements prepared for the institution's prior
12 fiscal year and signed under penalty of perjury, and shall submit a hard copy under separate cover
13 of such statements in conjunction with its annual report. The form, content and mode of
14 preparation of financial statements shall comply with Section 74115 of this Division. The Bureau
15 may request that the institution immediately make available for inspection to a representative of
16 the Bureau, these financial statements at the offices of the institution.

17 “(c) An institution shall file its annual report by September 1st. The Bureau may extend the
18 period for filing if the institution demonstrates evidence of substantial need but in no case longer
19 than 60 days. The institution shall not change the date of its filing its annual report because of a
20 change in the fiscal year without the Bureau's approval.

21 “(d) The annual report shall be electronically filed by submitting the information required
22 by section 94934 of the Code via the Bureau's website, electronically attaching, as directed, the
23 School Performance Fact Sheet and the school catalog. An institution without the capability to
24 submit the information electronically shall inform the Bureau not less than 45 days prior to the
25 date the information is required by subdivision (c), and receive direction on alternative means of
26 submission.”

27 23. Section 74112 of Title 5 of the California Code of Regulation states:
28

1 "(a) Format. The format for the Performance Fact Sheet shall be in at least 12 pt. type, in an
2 easily readable font, with 1.15 line spacing. The Performance Fact Sheet shall contain all and
3 only the information required or specifically permitted by section 94910 of the Code or this
4 chapter."

5 "(b) In addition to the definitions contained in section 94928 of the Code:

6 "(1) "Number of Students Who Began Program" means the number of students who
7 began a program who are scheduled to complete the program within 100% of the published
8 program length within the reporting calendar year, and includes all the students who remained
9 enrolled after their cancellation period."

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

12 "(3) "Graduates Employed in the Field" means those graduates who meet the
13 definition of section 94928(e) of the Code, who have reported their employment to the
14 institution."

15 "(c) Reporting periods:

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

18 "(2) A Performance Fact Sheet shall be current and available not later than August
19 1st, and shall report data for the previous two calendar years based upon the "number of students
20 who began program" or the "number of graduates," as defined in subdivision (b), for each
21 reported calendar year."

22 "(d) Completion Rates. Reporting of completion rates for an institution's Annual Report and
23 Performance Fact Sheet shall include, for each educational program, the number of students who
24 began program as defined in subdivision (b), the number of students available for graduation,
25 number of graduates, and completion rate(s). An optional column may be added to include
26 completion rate data for students completing within 101-150% of the published program length.
27 For an institution reporting completion data pursuant to section 94929(b) of the Code, completion
28 data shall be separately reported for each program. The Performance Fact Sheet shall disclose, if

1 true, that the completion data is being reported for students completing within 150% of the
 2 published program length, and that data is not being separately reported for students completing
 3 the program within 100% of the published program length. Completion rates shall be included in
 4 the Performance Fact Sheet in a format substantially similar to the chart below, including the
 5 footnoted information below (dates, numbers, and other data shown are for example only):"

6 Completion Rates (includes data for the two calendar years prior to reporting)

7 **Name of Educational Program (Program Length)**

8 Calendar Year	9 Number of Students Who Began Program	10 Students Available for Graduation	11 Graduates	12 Completion Rate
13 20XX	14 100	15 98	16 70	17 71%
18 20XY	19 80	20 80	21 55	22 69%

23 **Students Completing After Published Program Length - 150% Completion Rate**

24 **Name of Educational Program (Program Length)**

25 Calendar Year	26 Number of Students Who Began Program	27 Students Available for Graduation	28 150% Graduates	150% Completion Rate
29 20XX	30 100	31 98	32 25	33 26%
34 20XY	35 80	36 80	37 23	38 29%

39 "(e) Placement Rates."
 40
 41 "(1) Any placement data required by sections 94910(b) and 94929.5(a) of the Code
 42 shall be reported for the number of students who began the program as defined in subdivision (b)
 43 for each reported calendar year."

44 "(2) Placement is measured six months from the graduation date of each student.
 45 Reporting of placement rates shall include for each educational program: the number of students
 46 who began the program, the number of graduates as defined in subdivision (b), graduates
 47 available for employment, graduates employed in the field and placement rate(s)."
 48

"(3) Placement rate shall be calculated as follows: the number of graduates employed in the field as defined in subsection 74112(b)(3) divided by the number of graduates available for employment as defined in section 94928(d) of the Code."

"(4) Graduates employed in the field shall be reported for those graduates employed in the field in a single position that averages under 32 hours per week and those employed in the field in a single position that averages at least 32 hours per week."

"References to the Code are to the California Education Code where the California Private Postsecondary Education Act of 2009 is located."

"Placement rates shall be included in the Performance Fact Sheet in a format substantially similar to the chart below, including the footnoted information below (dates, numbers, and other data shown are for example only):"

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

Name of Educational Program (Program Length)

Calendar Year	Number of Students Who Began Program	Number of Graduates	Graduates Available for Employment	Graduates Employed in the Field	Placement Rate % Employed in the Field	Graduates Employed in the Field an average of less than 32 hours per week	Graduates Employed in the Field at least 32 hours per week
20XX	100	70	70	55	79%	5	50
20XY	80	55	55	20	36%	9	11

"(f) License Examination Passage Rates. If license examination passage rates are not available from the appropriate state agency, an institution shall collect the information directly from its graduates. If an institution demonstrates that, after reasonable efforts, it is unable to obtain the examination passage information from its graduates, the institution shall report the number of students it could not contact and note in a font the same size as the majority of the data on the Performance Fact Sheet, "License examination passage data is not available from the state"

1 agency administering the examination. We were unable to collect data from [enter the number]
2 graduates."

3 "Reporting of license examination passage rates for the Annual Report and the Performance
4 Fact Sheet shall include, for each educational program: the number of students completing the
5 program within 150% of published program length in the reported year, the number of
6 documented graduates who passed the first examination, number of documented graduates who
7 failed the first examination, the number of graduates for whom data is not available. An optional
8 column may be added to separately report licensing examination data for students who take and
9 pass the exam after failing initially. The Annual Report shall also include a description of the
10 processes for attempting to contact those students."

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

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

16 **Name of Educational Program (Program Length)**

17 Number of Students Taking Exam	Exam Date	Number Who Passed Exam	Number Who Failed Exam	Passage Rate
18 80	2/1/20XX	40	40	50%
19 100	6/1/20XX	75	25	75%
20 82	10/1/20XX	68	14	76%
21 80	2/1/20XY	40	40	50%
22 100	6/1/20XY	70	30	70%
23 92	10/1/20XY	62	30	67%

24
25 License examination passage data is not available from the state agency administering the
26 examination. We were unable to collect data from 32 graduates.

27 For licensing examinations that are continuously administered, license examination passage
28 rates shall be included in the Performance Fact Sheet in a format substantially similar to the chart

1 below, including the footnoted information below (dates, numbers, and other data shown are for
 2 example only):

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

4 **Name of Educational Program (Program Length)**

Calendar Year	Number of Students Taking Exam	Number Who Passed First Exam Taken	Number Who Failed First Exam Taken	Passage Rate
20XX	80	40	40	50%
20XY	100	75	25	75%

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

11 "(g) Salary and Wage Information.

12 All Salary and Wage Information shall be reported to the Bureau pursuant to section
 13 94929.5(c) of the Code and, if required by section 94910(d) of the Code, shall be included in the
 14 Performance Fact Sheet, for each educational program, in a format substantially similar to the
 15 chart below, including the footnoted information (dates, numbers, salaries, and other data shown
 16 are for example only)."

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

18 **Name of Educational Program (Program Length)**

19 Annual Salary and Wages Reported by Graduates Employed in the Field

Calendar Year	Graduates Available for Employment	Graduates Employed in the Field	\$15,000.00 - \$20,000.00	\$20,001.00 - \$25,000.00	\$25,001.00 - \$30,000.00	\$30,001.00 - \$35,000.00	Students Not Reporting Salary
20XX	100	70	5	40	6	3	16
20XX	80	55	5	7	3	5	35

24 "(h) Documentation supporting all data reported shall be maintained by the institution for at least
 25 five years from the time included in either an Annual Report or a Performance Fact Sheet, and
 26 shall include at a minimum: student name(s), address, phone number, email address, program
 27 completed, program start and completion dates, place of employment and position, salary, hours,
 28 and a description of all attempts to contact each student. Documentation shall also include the

1 name, email address, phone number, and position or title of the institution's representative who is
2 primarily responsible for obtaining the students' completion, placement, licensing, and salary and
3 wage data, the date that the information was gathered, and copies of notes, letters or emails
4 through which the information was requested and gathered."

5 **FIRST CAUSE FOR DENIAL OF APPLICATION**

6 (Enrollment Agreement)

7 24. Respondent's application is subject to denial under section 480 subdivision (a)(3)(A),
8 Education Code sections 94906, 94911, 94909, and California Code of Regulations, title 5,
9 division 7.5, sections 71800, in that Respondent submitted a deficient "Enrollment Agreement"
10 to the Bureau. Each violation is a sole and separate cause for denial. The violations are as
11 follows:

12 a. Respondent is unable to prove compliance with Education Code section 94906
13 subdivision (a) and (b) in that it failed to provide information as to how it will provide the
14 enrollment agreement, disclosures and statements to students when they are unable to understand
15 the terms and conditions of the same due to English not being their primary language, or if
16 recruitment was not conducted in English.

17 b. Respondent is unable to prove compliance with title 5 of the California Code of
18 Regulations sections 71800 subdivision (a) and (d) in that the enrollment agreement provided by
19 the Respondent does not indicate the address where the instruction will be held, nor does the
20 document contain a space to be completed at time of enrollment that would indicate the date by
21 which the student must exercise his or her right to cancel or withdraw from a course.

22 c. Respondent is unable to prove compliance with title 5 of the California Code of
23 Regulations sections 71800 subdivision (e) in that the Respondent failed to provide a consistent
24 itemized schedule of charges throughout the enrollment agreement.

25 d. Respondent is unable to prove compliance with Education Code sections 94911
26 subdivision (h) and 94909 subdivision (a)(15) in that it failed to provide an enrollment agreement
27 with specific language addressing the transferability of student credits or credentials.
28

1 **SECOND CAUSE FOR DENIAL OF APPLICATION**

2 (School Catalog)

3 25. Respondent's application is subject to denial under section 480 subdivision (a)(3)(A),
4 Education Code sections, 94897, 94909, and California Code of Regulations, title 5, division 7.5,
5 sections 71770, 71810, and 71865 in that Respondent submitted a deficient "Enrollment
6 Agreement" to the Bureau. Each violation is a sole and separate cause for denial. The violations
7 are as follows:

8 a. Respondent has failed to prove compliance with Education Code section 94897
9 subdivision (i)(1), which requires that the institution not use its name in any manner improperly
10 implying the institution is affiliated with a government agency, public or private corporation,
11 agency or association if it is not, in fact, affiliated. The circumstances are such that Respondent
12 was unable to show proper affiliations with the entities "American Translators Association" and
13 the "National Association of Student Affairs".

14 b. Respondent has failed to prove compliance with Education Code section 94897
15 subdivision (i)(1), which requires that the institution not use its name in any manner improperly
16 implying the institution is affiliated with a government agency, public or private corporation,
17 agency or association if it is not, in fact, affiliated. The circumstances are such that Respondent is
18 unable to prove that it is an approved institution with the Veterans Administration.

19 c. Respondent has failed to prove compliance with Education Code section 94897
20 subdivision (l) and 94909 (a)(2) in it was required to provide a statement in its catalog that it is a
21 private institution and that it is approved to operate by the Bureau of Private Post Secondary
22 Education. The circumstances are such that Respondent's catalog improperly implies that the
23 Bureau endorsed its programs and that Bureau approval means that the institution exceeds
24 minimum state standards.

25 d. Respondent has failed to prove compliance with Education Code section 94909
26 subdivision (a)(12) in that respondent is required to specify in its catalog whether the institution
27 has a pending petition in bankruptcy, is operating as a debtor in possession, or has filed a petition
28 for bankruptcy in the preceding five 5 years that resulted in reorganization under Chapter 11 of

1 the Bankruptcy Code. The circumstances are such that Respondent's catalog has not properly
2 disclosed this information.

3 e. Respondent has failed to prove compliance with title 5 of the California Code
4 of Regulations section 71810 subdivision (b)(10) in that respondent failed to specify in its catalog
5 a description of library and other learning resources and the procedures for student access to those
6 resources.

7 f. Respondent has failed to prove compliance with Education Code section 94909
8 subdivision (a)(15) in that Respondent failed to provide the appropriate language in its catalog
9 addressing the transferability of student credits and/or credentials.

10 g. Respondent has failed to prove compliance with section 94909 subdivision
11 (a)(8)(A) of the Education Code and 71770 subdivisions (a) (b) & (c) of title 5 of the California
12 Code of Regulations in that Respondent was required to provide admission policies regarding
13 acceptance of credited earned at other institutions or through challenge examinations and
14 achievement tests, requirements for ability-to- benefit students, and a list describing any transfer
15 or articulation agreements between the institution and any other college or university that
16 provides for the transfer of credits earned in the program of instruction. If the Respondent has not
17 entered into an articulation or transfer agreement with any other college or university, the
18 institution must disclose that fact.

19 h. Respondent has failed to prove compliance with title 5 of the California Code
20 of Regulations section 71810 subdivision (b)(3) in that Respondent was required to specify
21 whether Visa services are provided or whether the institution will vouch for the student status and
22 any associated charges. The circumstances are such that Respondent failed to provide a clear
23 description of their policy regarding the Visa services they offer.

24 i. Respondent has failed to prove compliance with title 5 of the California Code
25 of Regulations section 71810 subdivision (b)(4)(A) in that Respondent failed to provide in its
26 catalog consistent language proficiency information, including the level of English language
27 proficiency required of students and the kind of documentation of proficiency that will be
28

1 accepted. It further failed to provide where English language services are provided along with the
2 nature of said services and cost.

3 j. Respondent has failed to prove compliance with title 5 of the California Code
4 of Regulations section 71810 subdivision (b)(4)(B) in that Respondent failed to clearly indicate
5 whether any instruction will occur in a language other than English, and if so, the level of
6 proficiency and the kind of documentation of proficiency that will be accepted.

7 k. Respondent has failed to prove compliance with Education Code section 94909
8 subdivision (a)(5) in that Respondent's catalog does not contain a consistent and concise
9 description of the programs offered including a description of the instruction provided in each of
10 the courses offered by the institution, the requirements for completion of each program,
11 including required courses, final tests or examinations, any required internships or externships,
12 and the total number of credit hours, clock hours, or other increments required for completion.

13 l. Respondent has failed to prove compliance with Education Code section 94909
14 subdivision (a)(16) and title 5 of the California Code of Regulations section 94897 subdivision
15 (p), which requires an institution that is unaccredited and offers a degree program, or is accredited
16 and offers an unaccredited degree program, to provide a statement disclosing the known
17 limitation of the degree program including, but not limited to, whether a graduate of the degree
18 program will be eligible to sit for the applicable licensure exam in California and other states.
19 The circumstances are such that while the Respondent's catalog does inform graduates of the
20 Masters of Arts program that they will be eligible to sit for the certification test, it does not inform
21 students that the certification from the State of California does not require a degree to be eligible
22 to sit for this exam.

23 m. Respondent has failed to prove compliance with Education Code section 94909
24 subdivision (a)(9) in that its catalog fails to provide a consistent schedule of total charges for the
25 period of attendance and an estimated schedule of total charges for the entire program.

26 n. Respondent has failed to prove compliance with Education Code section 94909
27 subdivision (a)(7) in that the catalog contains inconsistent information regarding the faculty and
28 their qualifications when compared against the Respondent's website.

1 o. Respondent has failed to prove compliance with Education Code section 94909
2 subdivision (a)(10), which requires that the catalog contain a statement reporting whether the
3 institution participates in Federal and state financial aid programs, and if so, all consumer
4 information that is required to be disclosed to the student pursuant to Federal and state financial
5 aid programs. While the information provided by the Respondent does state that it does not
6 participate in Federal and state financial aid programs, the catalog includes information that
7 "eligible students can participate in the work-study program through which the school will
8 provide translation and interpreting works to qualified students". This description fails to include
9 the required definition of "eligible students" or the guidelines for the "work-study program".

10 p. Respondent has failed to prove compliance with title 5 of the California Code
11 of Regulations section 71865 subdivision (e), which requires that the catalog contain the
12 institution's standards for student achievement. The guidelines offered in the Respondent's
13 catalog are unclear and the Bureau cannot determine the student's achievement standards for
14 degree programs versus the certificate programs.

15 q. Respondent has failed to prove compliance with title 5 of the California Code
16 of Regulations section 71810 subdivision (b)(11), which requires that an institution who offers
17 distance education shall set forth in its catalog the approximate number of days that will elapse
18 between the institution's receipt of student lessons, projects, or dissertations and the institution's
19 mailing of its response or evaluation. While the Respondents catalog refers to "distance learning"
20 programs in the Masters of Arts description, it is not approved for distance education and has not
21 submitted a "Change in Educational Method of Instructional Delivery" to the Bureau to add this
22 component of their instruction.

23 r. Respondent has failed to prove compliance with Education Code section 94894
24 subdivision (I)(1), in that Respondent states in its catalog that the Bureau of Private Post
25 Secondary Education has "approved" or "licensed" the courses described in the catalog when the
26 Bureau has not approved the courses.

27 s. Respondent has failed to prove compliance with title 5 of the California Code
28 of Regulations section 71770 subdivision (a)(2), in that the Bureau is unable to determine whether

1 the Respondent implemented a complying admission policy for the Master of Arts in Translation
2 and Interpretation program.

3 t. Respondent has failed to prove compliance with title 5 of the California Code
4 of Regulations sections 71810 subdivision (b)(2) and 70000(r), in that the Respondent's catalog
5 fails to provide educational program objectives, which are the goals and methods by which the
6 institution fulfills its mission and transforms it into measurable student learning outcomes.

7 **THIRD CAUSE FOR DENIAL OF APPLICATION**

8 (Educational programs)

9 26. Respondent's application is subject to denial under section 480 subdivision (a)(3)(A),
10 and California Code of Regulations, title 5, division 7.5, sections 71865 and 71710 in that
11 Respondent submitted a deficient "Educational Program" to the Bureau. Each violation is a sole
12 and separate cause for denial. The violations are as follows:

13 a. Respondent has failed to prove compliance with title 5 of the California Code
14 of Regulations section 71865 subdivision (a), in that the Bureau is unable to determine the level
15 of rigor offered for the Masters of Arts in Translation and Interpretation program as the course
16 descriptions presented by the Respondent do not indicate an equivalency that is in depth to the
17 normally acquired studies beyond a Bachelor of Arts degree.

18 b. Respondent has failed to prove compliance with title 5 of the California Code
19 of Regulations sections 71865 subdivision (a) and 71710 subdivision (a), in that the Bureau is
20 unable to determine the level of rigor offered for the Masters of Arts in Translation and
21 Interpretation program as the courses described under the heading "Mission Language Studies"
22 are not comprised of subject areas that are necessary for a student to achieve the educational
23 objectives normally required at the Masters level.

24 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

25 (Website)

26 27. Respondent's application is subject to denial under section 480 subdivision (a)(3)(A)
27 and Education Code section 94913 which requires that an institution that maintains an Internet
28 Website provide on that website all of the following: the school catalog, a School Performance

1 Fact Sheet for each educational program offered by the institution, a link to the Bureau's internet
2 website, and the institution's most recent annual report submitted to the Bureau. Respondent's
3 website is not in compliance in that it advertises "The 40-hour Medical Interpreter Training"
4 program which is currently not approved by the Bureau.

5 **FIFTH CAUSE FOR DENIAL OF APPLICATION**

6 (School Performance Fact Sheet)

7 28. Respondent's application is subject to denial under section 480 subdivision (a)(3)(A),
8 Education Code section 94910, and California Code of Regulations, title 5, division 7.5, section
9 74112 in that Respondent submitted a deficient "School Performance Fact Sheet" to the Bureau.
10 The circumstances are such that the "School Performance Fact Sheet" submitted by the
11 Respondent does not contain the program(s) name or the year(s) the documents submitted
12 represent. The documents submitted by the Respondent are not complete and the number of
13 documents conflict with the approved programs currently offered.

14 **SIXTH CAUSE FOR DENIAL OF APPLICATION**

15 (Failure to Submit Annual Report)

16 29. Respondent's application is subject to denial under section 480 subdivision (a)(3)(A),
17 Education Code section 94934, and California Code of Regulations, title 5, division 7.5, section
18 74110 in that Respondent failed to submit an Annual Report to the Bureau for the year 2013.

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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 Los Angeles Institute of Translation and Interpretation; Junhui Joo-Park, owner for a Approval to Operate an Institution Non-Accredited;
2. Taking such other and further action as deemed necessary and proper.

DATED: 12/23/15



JOANNE WENZEL
Chief
Bureau for Private Postsecondary Education
Department of Consumer Affairs
State of California
Complainant

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