

TITLE 5. Bureau for Private Postsecondary Education
DEPARTMENT OF CONSUMER AFFAIRS

INITIAL STATEMENT OF REASONS

Hearing Date: No Hearing Scheduled

Subject Matter of Proposed Regulations: Use of the Term “University”

Section(s) Affected: Title 5, Division 7.5, Section 74150

Background and Statement of the Problem:

Background: The Bureau for Private Postsecondary Education (Bureau) protects students and consumers through the regulatory oversight of California’s private postsecondary educational institutions (“institutions”) pursuant to the California Private Postsecondary Education Act of 2009 (“Act” – Ed. Code, §§ 94800-94950), including conducting qualitative reviews of educational programs and operating standards.

Existing regulation in Title 5, Division 7.5, Section 74150 of the California Code of Regulations (CCR)¹ define a “university” as an institution of higher education that confers a master’s or a doctor’s degree upon the completion of programs of graduate or professional study and that may also confer a bachelor’s degree upon the completion of programs of undergraduate study. CCR 74150 also specifies that, unless previously approved by the Bureau, no institution shall use the word “university” in its name or in connection with a description of itself or its educational programs unless the institution meets this definition, or the institution uses other words in conjunction with “university” to prevent the word from being deceptive or misleading in any manner.

Statement of the Problem: The existing regulations present two main problems that the proposed regulations aim to address. First, the statement “Unless previously approved by the Bureau” has resulted in deceptive practices when the Bureau approves an institution to use the term “university,” but later, the institution is either not accredited or does not confer graduate degrees. For instance, the Bureau currently has no language to prevent institutions with provisional approval to offer degree programs from using the term. Many provisionally approved institutions subsequently fail to achieve accreditation

¹ Unless otherwise specified, all references to the CCR are to Title 5.

and no longer offer degree programs. Other times, an institution approved by means of its accreditation may have disciplinary, legal, or other action taken against it or cease offering graduate or other degree programs. However, because these institutions were “previously approved by the Bureau,” there is no mechanism in existing regulation to require institutions not to use the term “university” if they do not fully yet meet, or no longer meet, the requirements of section 74150. As such, existing regulations are unclear in the process for an approved institution to follow if it does not meet the requirements of a “university.” There are also risks for consumers who may believe an institution confers graduate-level degrees when, in fact, it does not have the authority to do so.

The second issue in the existing regulation is found in subdivision (b) (2), which permits the use of other words in conjunction with the term “university” to prevent the use of “university” from being deceptive or misleading in any manner. This is a subjective standard that may be challenged as to whether using the term “university” is done so in a way that prevents it from being perceived as deceptive or misleading. Ultimately, the Bureau proposes a clear, objective standard to use the term “university” that provides a greater level of consumer protection than the existing regulation.

The Bureau proposes to revise this regulation to ensure that accredited institutions that are recognized by the U.S. Department of Education and confer graduate degrees use the term, unless specified under the proposed regulation. This aligns with the Bureau’s mission to protect students and consumers across California’s private postsecondary education landscape by ensuring that if a student attends a private postsecondary educational institution that calls itself a “university,” that student can be sure their institution is legitimately able to describe itself as such and confers graduate degrees upon the completion of graduate or professional study.

This regulatory proposal would specify all of the following requirements in regulation to provide for additional specificity regarding the use of the term “university” and applicable steps for an institution to follow if it no longer meets the requirements to use the term. The changes are as follows:

Amending section 74150 of the CCR to:

- Set a clear standard in subdivision (a) that a “university” means an institution of higher education that is accredited by an accrediting agency recognized by the United States Department of Education that confers a graduate degree (rather than master’s/doctor’s) upon the completion of programs of graduate or professional study, and that may also confer an undergraduate degree (rather than bachelor’s) upon the completion of programs of undergraduate study.

- In subdivision (b), remove the phrase “Unless previously approved by the Bureau.”
- Add specifying language to (b), preventing the use of the term “university” in either full or abbreviated form, or in combination with any series of letters, numbers, or words unless it meets the requirements of a university.
- Remove language in (b)(2) that allows the use of other words in conjunction with “university” to prevent the use of “university” from being deceptive or misleading in any manner.
- Add a new subdivision (c), with paragraphs (1) and (2) that specify the application that an institution must submit, requirements for submission, and the time to submit that application, if it no longer meets the requirements of a “university.”
- Clearly state in paragraph (c)(3) that failure to comply with the requirements of the section will be considered a violation and subject to action by the Bureau.
- Add 74150(d) to allow existing institutions already using the term “university” within the bounds of the current regulations to continue using the term.
- Requires an institution to comply with the new regulation if it submits an application to change its name on or after January 1, 2027.

Anticipated benefits from this regulatory action:

The proposed regulatory amendments provide several benefits to students, consumers, institutions, and the public by enhancing consumer protection and specifying the requirements to use the term “university” and clarifying what to do in the event that an institution no longer meets the requirements to use the term.

The primary benefit of the proposed regulation is enhanced consumer protection for California students. The amendments establish clear, objective criteria for the use of the term “university,” that an institution must be accredited by an accrediting agency recognized by the U.S. Department of Education and confer graduate degrees, unless otherwise specified under the proposed provisions. By clarifying the requirements using the term, the regulation reduces the likelihood that students will be misled into believing that an institution offers graduate-level education or otherwise holds a level of academic recognition that it does not possess. This will improve the accuracy of institutional representations and support informed decision-making by students.

The proposed regulations benefit institutions by addressing a gap in Section 74150, which permits continued use of the term “university” once it obtains Bureau approval, even if the institution no longer meets the definitional requirements. By establishing a mechanism requiring institutions to have accreditation and confer graduate degrees, and by specifying steps to be taken if those requirements are no longer met, the regulation

ensures that an institution using the term “university” is reflective of the institution’s status rather than solely because of its historical approval. This promotes accurate use of the term “university,” and prevents the Bureau’s approval of an institution from undermining consumer protection. Institutions further benefit from clear standards that will allow the Bureau to administer and enforce the regulation more efficiently and consistently. Removing subjective language from subdivision (b) benefits institutions by reducing ambiguity, promoting consistent enforcement of the term, and decreasing the likelihood of disputes regarding whether the term is being used misleadingly.

Finally, the term “university” carries widely understood academic significance. Aligning regulatory requirements with public expectations reinforces confidence in institutions regulated by the Bureau. The proposed amendments will benefit the public by strengthening public trust in California’s private postsecondary sector by ensuring that institutional representations as a “university” accurately reflect the academic authority and accreditation status.

Specific purpose of, and rationale for, each adoption, amendment, or repeal:

1. Amend section 74150 of Article 3 of Chapter 4 of Title 5 of Division 7.5 of the California Code of Regulations

74150. Use of the Term “University.”

Proposed Change: In subdivision (a), add “that is accredited by an accrediting agency recognized by the United States Department of Education” after “For the purpose of this section, “university” means an institution of higher education.”

Purpose: This adds the requirement that for an institution to use the term “university,” it must be accredited by an accrediting agency recognized by the U.S. Department of Education, in addition to conferring graduate degrees upon the completion of programs of graduate or professional-level study. The proposed language prevents institutions with provisional approval to offer degree programs from using the term.

Rationale: As stated above, the term “university” carries a widely understood academic significance. For institutions under the oversight of the Act, the importance of the term is that it signifies an institution's ability to confer graduate degrees upon the completion of programs of graduate or professional level study. Section 94885(b) of the Act requires that an institution offering a degree must either have “Accreditation by an accrediting agency recognized by the United States Department of Education,” or must have “An accreditation plan, approved by the bureau, for the institution to become fully accredited

within five years of the bureau’s issuance of a provisional approval to operate to the institution’s degree programs.” The Bureau proposes to add that, for an institution that describes itself as a “university” specifically, it must be accredited by an accrediting agency recognized by the U.S. Department of Education. This proposed change ensures that using the term “university” is due to the institution’s confirmed accreditation status and academic rigor, rather than solely because of its historical approval by the Bureau. The standard is clear for institutions to follow, so they use (or do not use) the term “university” as permitted by the regulatory section. This promotes accountability and ensures that institutions describing themselves as a “university” meet two key criteria to use the term.

In terms of institutions with a provisional approval to operate degree programs, the proposed change is necessary to enhance consumer protection for students attending these institutions by preventing “university” from being used in a way that may mislead the public about the institution’s ability to confer graduate degrees. Data from the Bureau’s February 5, 2026, Advisory Committee meeting shows that institutions with provisional approval to offer degree programs often fail to achieve their desired accreditation status. Out of the 102 institutions issued provisional approval under EDC §§94885(c), 94885.5, or 94885.7, 51 institutions, or 50 percent of the total institutional population, either surrendered their degree programs, had those programs suspended, or closed. Approximately 25 percent of institutions achieved accreditation, and approximately 23 percent are still pursuing accreditation. Out of the 222 total institutions pursuing accreditation that have concluded their efforts to obtain accreditation,² only 74 achieved accreditation, or 33 percent of institutions. 65 out of 22 institutions closed, and 62 institutions had their degree programs suspended or surrendered.

Permitting these institutions to use the term “university” without a long-term likelihood that they will continue to confer graduate degrees upon the completion of graduate-level programs presents a likelihood of misleading the public about the institution’s authority to confer graduate degrees, a prohibited business practice outlined in EDC §94897(i) and (u). Therefore, it is necessary that the Bureau’s regulatory standard for using the term “university” pertain specifically to institutions that have already demonstrated academic quality by achieving accreditation, rather than simply pursuing it.

Importantly, the proposed regulations do not prevent an institution with provisional approval to offer degree programs from offering graduate or professional-level degrees if those are the programs the institution chooses to offer. Rather, the regulations restrict the use of the term “university” until such a time that the institution is accredited and

² Includes institutions affected by EDC §94885.1

confers graduate degrees. For instance, an institution could call itself a “college” or “graduate institute” while it holds a provisional approval to offer degree programs. However, it must wait to use the term “university” until it achieves accreditation by a recognized accrediting agency. The proposed regulation is clearer for an institution if it chooses to change its name once it achieves accreditation, as the substantive change process for an institution to change names is less rigorous for an accredited institution than for an institution that does not have accreditation.

Proposed Change: In subdivision (a), delete the words “master’s or a doctor’s” and replace them with the word “graduate.”

Purpose: This change replaces existing text with another word that has the same meaning, but is more consistent within the regulation.

Rationale: The phrase used in the existing regulation can be made clearer and more consistent by aligning it with other regulations found at Section 71865, which is titled “Minimum Educational Requirements in Order to Award a Graduate Degree.” This section refers to different types of graduate degrees (Master’s degrees, professional Doctoral degrees, and Doctor of Philosophy degrees). The proposed change to Section 74150 will ensure that the regulations are easily understood by the regulated public.

Proposed Change: In subdivision (a), add a comma after “graduate or professional study.”

Purpose: This is a non-substantive change to add punctuation.

Rationale: This change adds a comma to the section for punctuation purposes. This also helps ensure that the section is easier to understand, that the parameters surrounding the use of the term “university” rely on the institution’s accreditation and ability to confer graduate degrees, while a university can also confer an undergraduate degree.

Proposed Change: In subdivision (a), replace “bachelor’s” with “undergraduate.” Add the letter “n” so the regulatory language reads “an undergraduate.”

Purpose: This change replaces existing text with language that is more consistent within CCR Division 7.5 (i.e. section 71850). Adding the letter “n” is a non-substantive change for grammatical correctness.

Rationale: The phrase used in the existing regulation can be made clearer and more consistent by aligning it with other regulations found at Section 71850, which is titled

“Minimum Educational Requirements in Order to Award an Undergraduate Degree.” This section refers to different types of undergraduate degrees. The proposed change to Section 74150 is necessary to ensure that the regulations are easily understood by the regulated public, as a university may confer Bachelor’s, Associate’s, or Specialized Associate’s degrees upon the completion of programs of undergraduate study, and not just a “bachelor’s” degree.

Proposed Change: In subdivision (b), delete “Unless previously approved by the Bureau.”

Purpose: This change removes the above text, so the proposed requirement in (a) is clear for all institutions. If an institution uses the term “University,” it is because the institution meets the requirements of (a), and not solely because it was previously approved by the Bureau.

Rationale: The phrase “Unless previously approved by the Bureau” was added in 2010. This phrase replaced previous regulatory language in that section that referenced institutions using the term “university” under a previous regulation.

While originally intended to factor in these institutions that held prior approval by the Bureau and, as such, were already using the term “university,” using a blanket phrase “unless previously approved by the Bureau” has resulted in problems for the Bureau. The problems arise when an institution does not confer graduate-level degrees, but continues to describe itself as a “university” simply because the Bureau’s regulations permit it to do so once it has approval from the Bureau. Most often, this situation arises when an institution (provisionally approved to offer degree programs or otherwise) has its degree programs suspended and no longer offers degrees, but continues to remain open, offering other types of programs whilst calling itself a “university.” This results in a possibility for consumers to be misled about the institution. In the context of a “university,” a member of the public may believe that an institution can confer graduate-level degrees when it cannot or does not, a prohibited business practice outlined in EDC 94897.

Instead of a blanket phrase that permits the use of the term once the Bureau approves an institution, the Bureau proposes to delete this phrase and add subdivision (d), described further below, to allow existing institutions that use the term to continue to do so, unless they submit a change of name application. This sets a clear standard for using the term while preventing an adverse economic impact on the institutions.

Ultimately, continuing the existing regulatory standard that permits institutions to use the

term “university” solely because of prior Bureau approval, rather than due to their accreditation and conferral of graduate degrees, presents a likelihood of misleading the public. Therefore, it is necessary that the Bureau’s regulatory standard for using the term “university” pertain specifically to institutions that meet the standards outlined in the proposed language in subdivision (a)—accreditation by a recognized accrediting agency and conferral of graduate degrees upon the completion of programs of graduate or professional study.

Proposed Change: In subdivision (b), capitalize “n” in the word “no”.

Purpose: This change is so that subdivision (b) begins with a capital letter.

Rationale: This is a non-substantive grammatical correction.

Proposed Change: In subdivision (b) add “in either full or abbreviated form, or in combination with any series of letters, numbers, or words” after “use the word ‘university.’”

Purpose: This proposed change adds needed specificity pertaining to other ways the term “university” is used that conveys the same meaning as the use of the term itself.

Rationale: The proposed change adds necessary specificity to restrict the use of the term “university” when it appears in full or abbreviated form, and may be used in combination with any series of letters, numbers, or words. This covers all possible permutations of the term “university” that could imply an institution is a legitimately accredited, graduate degree-granting entity. This is necessary because abbreviations, or other letters, numbers, or words that are used in combination with the term “university” convey the same meaning as the full term about an institution’s academic programs, and as such, present the same likelihood to mislead a member of the public if used improperly.

This change is modeled after language found in Florida law at Title 48, Chapter 1005, Section 1005.03, which states, “the use of the designation ‘college’ or ‘university’ in combination with any series of letters, numbers, or words is restricted in this state to colleges or universities as defined in s. 1005.02 that offer degrees as defined in s. 1005.02...”³ This language provides clear, enforceable standards that can be easily understood when read by a member of the public.

Addressing abbreviations or other shortened versions of “university” is necessary

³ FL Stat. Tit. 48, Ch. 1005, §1005.03 (2025).

because some institutions use the letter “U” in place of the word “University.” While this is not using the full term itself, the letter “U” can convey the same air of legitimacy that the word “university” does, and if misused, can mislead the public. If a prospective student sees an abbreviation of “U” in an institution's name, it is likely that the student believes the “U” stands for “university,” which may not be the case.

Including the term “letters” closes a loophole where other letters might be attached to either full or abbreviated versions of the term “university.” For example, “Delta International University,” an institution that had its approval revoked in November 2025, used an abbreviation of “University” (DIU) and, in some cases, was known as DIUCA (such as Bureau enforcement action against the institution, or in social media “hashtags”). This example highlights an instance where the term “university” is used in abbreviated form in combination with other letters. Other letters may also be present in institutional emails, website URLs, or other places where the institution conveys information about itself to prospective students or other members of the public.

Including the term “numbers” closes a possible loophole of attaching numerals to the protected term. For example, a school couldn’t call its educational program courses something like “Uni101,” “Uni102,” etc., abbreviate its name “University 4U,” or use other types of permutations, like “Univ3rsity,” unless it meets the requirements to use the term.

Including the term “words” captures the broadest category where the term may be used with other words. For instance, the same institution described above, “Delta International University,” has an FAQ page that uses an abbreviation of “University” (DIU) and includes the term in reference to *other* universities. However, the connection with the abbreviated name “DIU,” along with the reference to a graduate-level program, presents a high likelihood of misleading the public about the institution’s authority.

In conclusion, the inclusion of “letters, numbers, or words” in the proposed regulations prevents institutions from bypassing the restrictions through clever naming strategies. This approach offers the highest level of consumer protection and establishes clear, enforceable standards for institutions to adhere to.

Proposed Change: In subdivision (b), delete the number “(1).”

Purpose: With the proposed removal of clause (2), described further below, “(1)” is not necessary.

Rationale: Removing an obsolete designation for clause “(1)” is a non-substantive grammatical correction.

Proposed Change: In subdivision (b), delete the words “or (2) the institution uses other words in conjunction with “university” to prevent the use of “university” from being deceptive or misleading in any manner.”

Purpose: This change removes a subjective standard where an institution may be permitted to use the term “university” in conjunction with other words. The proposed deletion ensures that the requirements to use the term “university” in subdivision (a) apply to all institutions.

Rationale: This change is necessary so a clear, objective standard guides institutions on the appropriate use of the term “university.” Currently, an institution may use the term if other words are used in conjunction with “university” such that the term would present no reasonable likelihood of misleading the public. However, this standard is subjective and susceptible to arguments as to whether certain words used do, or do not, present a reasonable likelihood of misleading the public. If an institution describes itself or its programs as a “university” when it does not confer graduate-level programs, that presents a likelihood of misleading the public, regardless of whether extra words are used. A clear, objective standard is necessary for consumer protection so the public is not misled into thinking the institution is a “university” that confers graduate degrees. The proposed change is clearer for an institution to understand if it is permitted to use the term.

Additionally, the Bureau’s proposed language described above would reserve the use of the term “university” in either full or abbreviated form, or in combination with any letters, numbers, or words, specifically to those institutions that meet the requirements of the section. As a result, deleting clause (2) in the regulatory section is necessary to ensure consistency with the Bureau’s proposed changes.

Proposed Change: Add a new subdivision (c) to the section, beginning with paragraph (1), to state, “If an institution using the word “university” as described in subdivision (b) no longer meets the requirements of subdivision (a), it shall immediately, but no more than seven (7) days after it no longer meets the requirements of subdivision (a), submit an application described by section 71630.”

Purpose: This change adds a new subdivision and begins with paragraph (1) to require an institution to submit a change of name application and the timeframe in which that institution must submit that application, if it no longer meets the requirements to use the term “university.”

Rationale: The proposed change is necessary so that institutions have clear steps to follow if they no longer meet the requirements of a “university.” Establishing a specific timeframe for submitting a change of name application (the application described by section 76130) promotes timely compliance and helps ensure that institutions do not continue to represent themselves as a university when they no longer meet the required criteria. Similar language to require an institution to notify the Bureau “immediately, but not more than seven (7) days...” is found in the Act at Section 94885.7 when an institution ceases to be accredited by a recognized accrediting agency; therefore, the Bureau opted for similar language in section 74150 to encourage timely submission of a change of name application. This addition also supports transparency for students, prospective students, and the public by helping ensure that institutional titles accurately reflect an institution’s current status and qualifications.

Proposed Change: Add paragraph (2) to subdivision (c), to state, “An application submitted pursuant to paragraph (1) shall meet the requirements of subdivision (b).”

Purpose: This change specifies the requirement that if an institution no longer meets the requirements to use the term “university,” the application to change its name that is required by the proposed (c)(1) cannot contain “university” in either full or abbreviated form, or in combination with any series of letters, numbers, or words.

Rationale: The proposed change specifies that a change of name application, as described in section 71630, cannot use the term “university” if it no longer meets the criteria to use it. This change is necessary because an institution no longer qualifies to be called a “university” if it must submit a change of name application based on the new requirements outlined in subsection (c). This change is necessary to eliminate the potential loophole that allows an institution to submit a deficient application because its proposed name still includes the term “university.” If an institution continues to use this term after it no longer meets the requirements to be called a university, it creates confusion and can mislead the public about the institution’s authority to confer graduate degrees. The proposed additions will help clearly outline the specific requirements institutions must follow on an application to change their name when they no longer meet the definition of a “university.” Currently, if an institution filed an application to change its name and used the term “university” after it was no longer qualified, that would be noted as a deficiency on the application, regardless. Specifying the requirements in regulation reduces the potential for deficient applications from institutions and clarifies the requirements of the section. Therefore, the proposed addition of (c)(2) is necessary to specify that any change of name application submitted as a result of section 74150 must meet the requirements of (b).

Proposed Change: Add paragraph (3) to subdivision (c), to state, “Failure of any institution to comply with the requirements of this section will be considered a violation and subject to action by the Bureau.”

Purpose: This paragraph makes the penalty clear when an institution does not comply with the requirements of the regulatory section, including using the term “university” and the parameters around a change of name application submitted pursuant to paragraphs (1) and (2) in the proposed subdivision (c).

Rationale: The proposed change is necessary to clearly establish that noncompliance with the requirements of section 74150 constitutes a violation subject to action by the Bureau. Explicitly identifying the failure to comply with the section as a violation provides clarity to institutions regarding the consequences of using the term “university” without meeting the applicable requirements, or for failing to submit a required change of name application that no longer uses the term. This proposed change also supports consistent enforcement by the Bureau and helps ensure that institutional representations remain accurate—on change of name applications or otherwise—thereby protecting students and the public from potential confusion or misrepresentation regarding an institution’s ability to confer graduate degrees.

Proposed Change: Add subdivision (d) to the section, to state, “Subdivision (b) does not apply to an institution that was issued an approval to operate prior to January 1, 2027. For an institution that was issued an approval to operate prior to January 1, 2027 that submits an application described by section 71630 on or after January 1, 2027, the institution shall comply with subdivision (b).”

Purpose: This proposed change allows existing institutions that are already using the term “university” within the bounds of the current regulations to continue using the term. The proposed change contains language that requires an institution submitting a change of name application on or after January 1, 2027 to comply with the requirements to use the term “university.”

Rationale: Subdivision (d) is designed to ensure that these institutions already in compliance do not have to change their names due to the new regulation. Existing approved institutions that refer to themselves as “universities” either already meet the proposed requirements outlined in subdivision (a) or have been using the term because they were previously approved by the Bureau. There is a greater risk associated with institutions that might use the term “university” under provisional approvals but then fail to achieve accreditation, which would prevent them from conferring graduate degrees. Out of the 106 Bureau-approved institutions that call themselves “universities” as

described in the proposed subdivision (b), only 3 currently do not offer graduate-level degrees.

The Bureau aims to establish a clear and objective standard for the use of the term "university." It is essential to balance consumer protection—by preventing misleading use of the term—with the potential impacts on institutions that have historically used the term in compliance with existing regulations.

To maintain the intended goal of enhancing consumer protection while preventing misleading use of the term, subdivision (d) includes a requirement that any institution applying for a name change after January 1, 2027, must comply with the requirements set forth in subdivision (b). This change means that a name change application cannot include the term "university" as described in (b) unless the institution meets the accreditation requirements stated in subdivision (a)—specifically, being accredited by an agency recognized by the United States Department of Education and conferring a graduate degree after the completion of graduate or professional study programs. This ensures that any institution seeking to change its name in the future will accurately reflect its status and its ability to confer graduate degrees.

Underlying Data

Technical, theoretical, or empirical studies, reports, or documents relied upon:

1. Discussion on this proposed regulation occurred at the Bureau for Private Postsecondary Education's Advisory Committee meeting on February 4, 2026. Data on Provisionally Approved Degree Program Outcomes can be found on page 25. The text of the regulatory proposal presented is on page 81 of the meeting materials located at: https://bppe.ca.gov/about_us/meetings/materials/20260204_materials.pdf
2. The summary of the discussion of the proposal from the Bureau's February 4, 2026, Advisory Committee meeting can be found in the meeting minutes of the Bureau for Private Postsecondary Education's Advisory Committee meeting, located at: https://bppe.ca.gov/about_us/meetings/20260204_minutes.

Business Impact:

The Bureau has made the initial determination that the proposed regulations will not have a significant statewide adverse economic impact directly affecting businesses including the inability of California businesses to compete with businesses in other States.

This initial determination is based on the following fact that institutions using the term “University” under the existing regulation are not required to change names because language in subdivision 74150(d) grandfathers existing institutions that use the term. However, the exact number of institutions that may be required to submit a change of name application if they no longer meet the requirements to use the term “university” in the future is unknown.

If an institution submits an application to change its name in the future and no longer meets the requirements to use the term “university,” the impact on the institution to comply with the regulation by submitting a change of name application is estimated to be \$250, per instance.

If an existing institution had enforcement action taken against it that required the institution to change its name, that outcome would be a result of that enforcement action, not the proposed regulation.

Economic Impact Assessment:

The Bureau has determined that this regulatory proposal will have the following effects:

- It will not create or eliminate jobs within the State of California because the regulations affect the requirements to use the term “university” in an institution’s name or description of itself or its programs, and does not affect the creation or elimination of jobs.
- It will not create new business or eliminate existing businesses within the State of California because the regulations affect the requirements to use the term “university” in an institution’s name or description of itself or its programs, and does not affect whether a new business is created or an existing business is eliminated.
- It will not affect the expansion of businesses currently doing business within the State of California because the regulations affect the requirements to use the term “university” in an institution’s name or description of itself or its programs, and not an institution’s ability to expand its business.
- This regulatory proposal does not affect the health of California residents because it does not relate to health.

- This regulatory proposal affects the welfare of California residents because it enhances consumer protection and reduces the likelihood that students will be misled into believing that an institution offers graduate-level education or otherwise holds a level of academic recognition that it does not possess.
- This regulatory proposal does not affect worker safety because it does not involve worker safety.
- This regulatory proposal does not affect the state's environment because it does not involve the environment.

Specific Technologies or Equipment:

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives:

No reasonable alternative to the regulatory proposal would be either more effective in carrying out the purpose for which the action is proposed or would be as effective or less burdensome to affected private persons and equally effective in achieving the purposes of the regulation in a manner that ensures full compliance with the law being implemented or made specific.

Description of reasonable alternatives to the regulation that would lessen any adverse impact on small business:

No such alternatives have been proposed, however, the Bureau welcomes comments from the public.