

1 XAVIER BECERRA  
Attorney General of California  
2 ARMANDO ZAMBRANO  
Supervising Deputy Attorney General  
3 ELYSE M. DAVIDSON  
Deputy Attorney General  
4 State Bar No. 285842  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-2533  
6 Facsimile: (213) 897-2804  
*Attorneys for Complainant*  
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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  
12 Against:

Case No. 1001764

13 **RICHFIELD UNIVERSITY**

**STATEMENT OF ISSUES**

14 **Renewal of Approval to Operate and Offer**  
**Educational Program for Non-Accredited**  
15 **Institutions Applicant**

16 **Institution Code: 1936931**

17 Respondent.  
18

19 Complainant alleges:

20 **PARTIES**

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

24 2. On or about May 17, 2013, the Bureau for Private Postsecondary Education received  
25 an application for Renewal of Approval to Operate an Institution Non-Accredited from Richfield  
26 University ("Respondent"). On or about May 10, 2013, Dr. Michael Rahni as 95% owner and  
27 Roya A. Nik as 5% owner certified under penalty of perjury to the truthfulness of all statements,  
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1 answers, and representations in the application. The Bureau denied the application on March 4,  
2 2016.

### 3 APPLICANT'S LICENSE HISTORY

4 3. On or about May 17, 2013, the Bureau received an Application for Renewal of  
5 Approval to Operate an Institution Non-Accredited (Application Number 26150) from  
6 Respondent.

7 4. On or about June 25 2013 the Bureau issued the first deficiency letter to Respondent.  
8 On or about July 22, 2013, the Bureau received a response from Respondent.

9 5. On or about November 14, 2013, the Bureau sent the second deficiency letter to  
10 Respondent. On or about December 11, 2013, the Bureau received a response from Respondent.

11 6. On or about January 23, 2014, the Bureau sent the third deficiency letter to  
12 Respondent. On or about February 25, 2014, the Bureau received a response from Respondent.

13 7. On or about May 23, 2013, the Bureau sent the fourth deficiency letter to  
14 Respondent. On or about June 5, 2014, the Bureau received a response from Respondent.

15 8. On or about November 14, 2014, the Bureau sent the fifth deficiency letter to  
16 Respondent. On or about December 22, 2014, the Bureau received a response from Respondent.

17 9. On or about August 5, 2015, the Quality of Education Unit ("QEU") sent the sixth  
18 deficiency letter to Respondent. On or about October 2, 2015, the Bureau received a response  
19 from Respondent.

20 10. On or about October 29, 2015, the QEU sent the seventh deficiency letter to  
21 Respondent. On or about December 15, 2015, the Bureau received a response from Respondent.

22 11. On or about March 4, 2016, the Bureau sent Respondent a "Notice of Denial" letter.

23 12. On or about May 11, 2016, Respondent submitted a request for an appeal.

### 24 JURISDICTION

25 13. This Accusation is brought before the Director of the Department of Consumer  
26 Affairs ("Director") for the Bureau, under the authority of the following laws. All section  
27 references are to the Education Code unless otherwise indicated.

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1 (c) course or module materials that are designed or organized by duly qualified  
2 faculty. For each course or module, each student shall be provided with a syllabus or  
course outline that contains:

3 ....

4 (2) a statement of educational objectives;

5 (3) length of the educational program;

6 (4) sequence and frequency of lessons or class sessions;

7 ....

8 (6) sequential and detailed outline of subject matter to be addressed or a list of skills  
to be learned and how those skills are to be measured;

9 ....

10 (e) specific learning outcomes tied to the sequence of the presentation of the material  
to measure the students' learning of the material....

11 20. California Code of Regulations, title 5, division 7.5, section 71715 states:

12 “....

13 (b) The institution shall document that the instruction offered leads to the achievement  
14 of the learning objectives of each course....”

15 21. California Code of Regulations, title 5, division 7.5, section 71720 states:

16 (a) An Educational Program Leading to a Degree.

17 (1) An institution offering an educational program that leads to a degree shall employ  
18 duly qualified faculty sufficient in number to provide the instruction, student  
19 advisement, and learning outcomes evaluation necessary for the institution to  
document its achievement of its stated mission and objectives, and for students to  
achieve the specific learning objectives of each course offered;

20 ....

21 (4) The faculty shall have sufficient expertise to support the institution's awarding of  
22 a degree identifying a specialty or major field of emphasis, demonstrated by, at a  
minimum:

23 (A) That the person possesses one of the following:

24 1. a degree from: an institution approved by the Bureau or previously approved by a  
25 predecessor agency of the Bureau; or an accredited institution in the United States or  
26 Canada; or other state approved institution that documents that the institution at  
27 which the faculty member earned his or her degree is equivalent to an institution that  
is approved by the Bureau; or an institution outside the United States or Canada and  
in addition provides a comprehensive evaluation of the degree performed by a  
foreign credential evaluation service that is a member of the National Association of  
28 Credential Evaluation Services (NACES).

1 2. a credential generally recognized in the field of instruction.

2 (B) The degree, professional license, or credential possessed by the person shall be at  
3 least equivalent to the level of instruction being taught or evaluated;

4 ....  
5 (9) The institution shall maintain records documenting that each faculty member is  
6 duly qualified and was qualified to perform the duties to which the faculty member  
7 was assigned, including providing instruction, evaluating learning outcomes,  
8 evaluating graduate dissertations, theses, and student projects, and participating on  
9 doctoral committees....

### 7 **FIRST CAUSE FOR DENIAL OF APPLICATION**

#### 8 **(Failure to Meet Minimum Operating Standards – Description of Educational Program** 9 **Fails to Provide Acceptable Course Content)**

10 22. Respondent's application is subject to denial under Education Code section 94891,  
11 subdivision (b) and California Code of Regulations, title 5, section 71710, subdivisions (c)(4) and  
12 (6), in that Respondent's syllabi and or course content do not provide sequence and frequency of  
13 lessons or class sessions, or a sequential and detailed outline of subject matter to be addressed or  
14 a list of skills to be learned and how those skills are to be measured. The course descriptions in  
15 the catalog do not appear to be related to the course or the description is unclear and does not  
16 explain what will be taught, as follows:

17 a. On November 23, 2015, the Bureau reviewed Respondent's online learning platform.  
18 The platform contained one program, which was Masters of Business Administration in Global  
19 Leadership. The syllabi posted online for the program did not correspond with the syllabi  
20 submitted for review on October 2, 2015, and December 15, 2015.

### 21 **SECOND CAUSE FOR DENIAL OF APPLICATION**

#### 22 **(Failure to Meet Minimum Operating Standards – Description of Educational Program** 23 **Fails to Determine Length of Educational Programs)**

24 23. Respondent's application is subject to denial under Education Code section 94891,  
25 subdivision (b) and California Code of Regulations, title 5, section 71710, subdivisions (c)(3) and  
26 (4), in that Respondent's syllabi and or course content do not provide the length of the  
27 educational program, or the sequence and frequency of lessons or class sessions. The Bureau is  
28 unable to determine the length of the educational programs, as follows:

1 a. The syllabi Respondent submitted to the Bureau lists total program hours and two  
2 sets of class times. However, the syllabi do not specify if both class sessions are designated for  
3 one course or if a different course will be taken during each session. Additionally, the beginning  
4 and end date for each class is not listed.

5 **THIRD CAUSE FOR DENIAL OF APPLICATION**

6 **(Failure to Meet Minimum Operating Standards – Description of Educational Program  
7 Fails to Provide Clear Learning Objectives)**

8 24. Respondent's application is subject to denial under Education Code section 94891,  
9 subdivision (b) and California Code of Regulations, title 5, section 71710, subdivisions (c)(2) and  
10 (e), and section 71715, in that Respondent's syllabi and or course content do not provide a  
11 statement of educational objectives; specific learning outcomes tied to the sequence of the  
12 presentation of the material to measure the students' learning of the material; or, document that  
13 the instruction offered leads to the achievement of the learning objectives of each course. The  
14 course description, objectives and outcomes do not correspond and the Bureau is unable to  
15 determine specific and measurable outcomes for numerous class offerings.

16 **FOURTH CAUSE FOR DENIAL OF APPLICATION**

17 **(Failure to Meet Minimum Operating Standards – Faculty)**

18 25. Respondent's application is subject to denial under Education Code sections 94891,  
19 subdivision (b) and California Code of Regulations, title 5, section 71720, subdivisions (a)(4)(A)  
20 and (B), (a)(1), and (a)(9), in that Respondent failed to provide the Bureau with all current faculty  
21 transcripts as requested, as follows:

22 a. On or about December 1, 2013, Respondent reported in their deficiency response that  
23 they, "were having everyone's qualifications verified by NACES." On or about September 30,  
24 2015, Respondent reported that all transcripts in need of NACES evaluation had been submitted  
25 to Academic Evaluation Services for review. The Bureau did not receive any of the current  
26 faculty transcripts and is unable to determine if the institution has contracted with qualified  
27 faculty members.

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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 Richfield University for a Renewal of Approval to Operate an Institution Non-Accredited; and,
2. Taking such other and further action as deemed necessary and proper.

DATED: 3/10/17

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

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