



## NOTICE TO COMPLY

CA-22574123-032025

|                   |                                  |                        |                |
|-------------------|----------------------------------|------------------------|----------------|
| Institution Name: | Phlebotomy Training Specialists  | Institution Telephone: | 701 404-9434   |
| Institution Code: | 22574123                         | Administrator Name:    | Monica Sanborn |
| Street Address:   | 1450 North Tustin Ave, Suite 202 | Inspection Date:       | 3/5/2025       |

The Bureau for Private Postsecondary Education (Bureau) issues this Notice to Comply pursuant to California Education Code (CEC) section 94935 and Title 5 of the California Code of Regulations (5 CCR) section 75010.

California Private Postsecondary Education Act: [https://www.bppe.ca.gov/lawsregs/ppe\\_act.pdf](https://www.bppe.ca.gov/lawsregs/ppe_act.pdf)  
 Title 5 of the California Code of Regulations: <https://www.bppe.ca.gov/lawsregs/regs.pdf>

| Violation | Code Section Violated | Description of the violation and required correction.   |
|-----------|-----------------------|---|
| 1         | CEC § 94909(a)(4)     | <p><b>Violation Description:</b> The institution’s 2025 catalog fails to specify the addresses where class sessions will be held.</p> <p><b>Correction:</b> The institution shall update its catalog to specify where class sessions will be held, pursuant to CEC § 94909(a)(4).</p>   |
| 2         | CEC § 94909(a)(15)    | <p><b>Violation Description:</b> The institution’s 2025 catalog fails to contain the required notice concerning transferability of credits disclosure, verbatim.</p> <p><b>Correction:</b> The institution shall update its catalog to provide the notice concerning transferability of credits disclosure, verbatim, pursuant to CEC § 94909(a)(15).</p> |
| 3         | 5 CCR § 71810(b)(7)   | <p><b>Violation Description:</b> The institution’s 2025 catalog fails to provide its policies regarding prior experiential learning.</p> <p><b>Correction:</b> The institution shall update its catalog to provide its policies regarding prior experiential learning, pursuant to 5 CCR § 71810(b)(7).</p>   |

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|-----------|-------------------------|--|
| 4         | 5 CCR § 71810(b)(13)(B) | <p><b>Violation Description:</b> The institution's 2025 catalog fails to provide information regarding the availability of housing located reasonably near the institution's facilities and an estimation of the approximate cost or range of cost of the housing.</p> <p><b>Correction:</b> The institution shall update its catalog to include information regarding housing pursuant to 5 CCR § 71810(b)(13)(B).</p>  |
| 5         | CEC § 94897(s)          | <p><b>Violation Description:</b> The institution's catalog, pages 30 and 58 contain statements regarding not releasing transcripts until after financial obligations are satisfied. These statements violate California civil code 1788.93 referenced below.</p> <p><b>CA Civ Code § 1788.93.</b><br/> <i>Notwithstanding any provision of law, a school shall not do any of the following:</i></p> <p>(a) <i>Refuse to provide a transcript for a current or former student on the grounds that the student owes a debt.</i></p> <p>(b) <i>Condition the provision of a transcript on the payment of a debt, other than a fee charged to provide the transcript.</i></p> <p>(c) <i>Charge a higher fee for obtaining a transcript, or provide less favorable treatment of a transcript request because a student owes a debt.</i></p> <p>(d) <i>Use transcript issuance as a tool for debt collection.</i></p> <p><b>Correction:</b> The institution shall remove the non-compliant statements from the catalog pursuant to CEC § 94897(s).</p> |
| 6         | 5 CCR § 76215(b)        | <p><b>Violation Description:</b> Pages 20-21 of the institution's catalog contains the required STRF statement; however, the statement references the Bureau's old address and old telephone number.</p> <p><b>Correction:</b> The institution shall update the STRF statement in the institution's catalog with the Bureau's current address and current telephone number, pursuant to 5 CCR § 76215(b).</p>  |

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|-----------|-----------------------|--|
| 7         | CEC § 94897(l)        | <p><b>Violation Description:</b> The institution’s website states that the institution is approved by the bureau; however, it fails to clearly and conspicuously state that approval to operate means compliance with state standards set forth by the Private Post Secondary Education Act and Division 7.5 of the California Code of Regulations.</p> <p><b>Correction:</b> The institution shall update its website to define the term “approval” following the statement that identifies itself as being approved by the bureau, pursuant to CEC § 94897(l).</p> |
| 8         | CEC § 94913(a)(1)     | <p><b>Violation Description:</b> The institution fails to maintain a website that provides a clear and conspicuous link to the school catalog.</p> <p><b>Correction:</b> The institution shall update its website to provide a link to the school catalog, pursuant to CEC § 94913(a)(1).</p>  |
| 9         | CEC § 94913(a)(2)     | <p><b>Violation Description:</b> The institution fails to maintain a website that provides a clear and conspicuous link to the school performance fact sheet for each educational program offered.</p> <p><b>Correction:</b> The institution shall update its website to provide a link to its school performance fact sheet for each program, pursuant to CEC § 94913(a)(2).</p>  |
| 10        | CEC § 94913(a)(5)     | <p><b>Violation Description:</b> The institution fails to maintain a website that provides a clear and conspicuous link to its most recent annual report.</p> <p><b>Correction:</b> The institution shall update its website to provide a link to its most recent annual report, pursuant to CEC § 94913(a)(5).</p>  |
| 11        | CEC § 94913(b)        | <p><b>Violation Description:</b> The institution’s website fails to include information concerning where students may access the bureau’s web site anywhere the institution identifies itself as being approved by the bureau.</p> <p><b>Correction:</b> The institution shall update its website to provide information concerning where students may access the bureau’s website anywhere the institution identifies itself as being approved by the bureau, pursuant to CEC § 94913(b).</p>   |

| Violation | Code Section Violated | Description of the violation and required correction.   |
|-----------|-----------------------|---|
| 12        | CEC § 94911(e)(1)     | <p><b>Violation Description:</b> The institution’s 2025 CPT-1 enrollment agreement fails to contain the required caption “STUDENT’S RIGHT TO CANCEL” in capital letters.</p> <p><b>Correction:</b> The institution shall capitalize the caption pursuant to CEC § 94911(e)(1).</p>  |
| 13        | CEC § 94911(k)        | <p><b>Violation Description:</b> The institution’s ECG Technician Training enrollment agreement fails to contain the following required disclosure statement, verbatim, above the space for the student’s signature.</p> <p><i>I understand that this is a legally binding contract. My signature below certifies that I have read, understood, and agreed to my rights and responsibilities, and that the institution's cancellation and refund policies have been clearly explained to me.</i></p> <p><b>Correction:</b> The institution shall update its enrollment agreements to include the required disclosure statement, verbatim, above the space for the student’s signature pursuant to CEC § 94911(k).</p> |
| 14        | CEC § 94911(h)        | <p><b>Violation Description:</b> The institution’s CPT-1 and ECG Technician Training enrollment agreements fail to provide the complete name of the educational program in the required disclosure regarding transferability of credits.</p> <p><b>Correction:</b> The institution shall update the enrollment agreements to provide the complete name of the educational program in the required disclosure regarding transferability of credits, pursuant to CEC § 94911(h).</p>  |

Pursuant to 5 CCR section 75010(d), the Institution may do either of the following:

- (1) Within 30 days from the date of the inspection, sign and return the notice to comply, declaring under penalty of perjury that the violation was corrected and describing how compliance was achieved; or
- (2) Within 30 days from the date of the inspection, file with the Bureau a written notice of disagreement, specifying the minor violations described in the notice to comply with which the person approved to operate the institution disagrees, and appealing it by requesting an informal office conference. If a written notice of disagreement is not timely filed with the Bureau, the right to appeal is deemed to have been waived.

**Pursuant to CEC section 94935(h), failure to comply with the notice to comply will result in the Bureau taking appropriate administrative enforcement action.**

The Notice to Comply was given to the Institution's owner, person in control, chief academic officer, chief executive officer, chief operating officer, institution director, or any person delegated by any of the aforementioned persons to facilitate the inspection or accept such notice as set forth below.

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| Notice To Comply Given To Name & Title: | Monica Sanborn   |
| Bureau Compliance Analyst Name:         | Shannon Greenmun   |
| Bureau Compliance Analyst Signature:    |  |

## NOTICE TO COMPLY DECLARATION

CA-22574123-032025

|                   |   |                        |                |
|-------------------|---|------------------------|----------------|
| Institution Name: | Phlebotomy Training Specialists                         | Institution Telephone: | 701 404 9434   |
| Institution Code: | 22574123  | Administrator Name:    | Monica Sanborn |
| Street Address:   | 1450 North Tustin Ave, Suite 202<br>Santa Ana, CA 92705 | Inspection Date:       | 3/5/2025       |

I declare under penalty of perjury that each violation identified in this Notice to Comply has been corrected and attached with this declaration is evidence to support the correction of each violation identified.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name and Title