

State Council of Higher Education for Virginia Agenda Item

Item: Academic Affairs Committee – Action on Security University (Substitute for AA #4 in the Agenda Book)

Date of Meeting: March 16, 2015

Presenter: Dr. Joseph G. DeFilippo
Director of Academic Affairs & Planning
JoeDeFilippo@schev.edu

Ms. Sylvia Rosa-Casanova
Director, Private and Out-of-State Postsecondary Education
SylviaRosaCasanova@schev.edu

Most Recent Review/Action:

No previous Council review/action

Previous review/action

Date:

Action:

Background Information/Summary of Major Elements: This agenda item concludes an administrative process instituted by SCHEV with reference to “Security University” (SU), a career-technical postsecondary institution offering training in computer and network security. SCHEV staff sought revocation of SU’s certificate to operate in Virginia. However, the decision rendered by the hearing officer in this case recommends action short of revocation. Below is information on SU’s history in Virginia and staff’s recommendation for Council action.

I. Security University (SU) timeline/history in Virginia:

A. In relationship to SCHEV

- *1999-2006:* SU operates in Virginia without certification.
- *April 28, 2006:* SU becomes certified to operate in Virginia.
- *September 20, 2011:* SCHEV conducts its first audit of SU. The institution was found to have one item of non-compliance and an item of concern.
- *January 30-31, 2014:* SCHEV conducts its second audit of SU. The institution was found to have seven items of non-compliance and one item of concern. SCHEV staff initiates process to revoke SU’s certificate to operate: items of non-compliance indicate (a) a pattern of misleading

practices and (b) persistent inability to maintain compliance with Virginia regulation and other forms of external oversight.

- *May 1, 2014*: In accordance with the Virginia Administrative Process Act (APA), an informal fact-finding conference (IFF) was held, presided over by Dr. DeFilippo. After examining information provided at the IFF, Dr. DeFilippo determined that there was sufficient cause to proceed with revocation.
- *December 10, 2015*: In accord with the APA, a formal hearing—presided over by an officer appointed by the Supreme Court of Virginia—was held. The hearing officer was obliged to submit his decision within 90 days, i.e. by March 10, 2015. The decision was submitted by email on March 10, 2015, at 5:29 PM.
- Documentation:
 - **Appendix A**: Letter from Peter Blake, Director of SCHEV, to Ms. Sondra Schneider, CEO of Security University. Date: March 14, 2014.
 - **Appendix B**: SCHEV Report on January 30-31, 2014 Audit of Security University. Date: March 14, 2014.
 - **Appendix C**: “SCHEV’s Response to Security University’s Opposition to March 14, 2014 Audit,” Assistant Attorney General Mike F. Melis. Date: December 5, 2014.
 - **Appendix D**: Hearing Officer’s “Findings of Fact, Conclusions, Decision and Recommendation.” Date: March 10, 2015.

B. In relationship to the Virginia Department of Veterans Services (DVS)

- *Prior to 2013*: SU receives approval to provide training certification to Veterans using their GI bill benefits.
- *August 2, 2013*: DVS removes SU’s approval to provide veterans training certification, effective July 3, 2013.
- Documentation:
 - **Appendix E**: Letter from Ms. Annie Walker, Director of the Virginia Department of Veterans Services to the U.S. Department of Veterans Affairs, revoking Security University’s approval to certify veterans’ training. Date: August 2, 2013.

C. In relationship to the Accrediting Council for Continuing Education and Training (ACCET)

- *April, 2011*: SU is granted accreditation by ACCET for a three-year term.
- *August 21, 2014*: ACCET notifies SU that it is moving to revoke its accreditation, subject to the ACCET appeals process.
- *January 5, 2015*: ACCET notifies SU of the final revocation of its accreditation.
- Documentation:
 - **Appendix F**: Letter from Mr. William V. Larkin, Executive Director of the Accrediting Council for Continuing Education and Training (ACCET), to Ms. Schneider, conveying final revocation of Security University’s accreditation.

II. Staff Recommendation for Council Action

- A. The hearing officer has concluded that while SU is not in full compliance with Virginia regulation, SCHEV failed to prove that such non-compliance has been committed knowingly. Please take note of the following passage from the hearing officer's decision, pp. 19-20:

Based on the evidence at the Hearing on December 10, 2014 and the documents submitted by the parties and admitted as part of the record, Security University has clearly not developed systems of records that fully comply with the requirements of SCHEV and the cited regulations that formed the basis of SCHEV's recommendation that Security University's certificate to continue providing educational services should be revoked. It is clear that Security University needs substantial assistance to make Security University fully in compliance with all Virginia Administrative Code requirements.

Significant to note, however, is that even if it were concluded that Security University failed to comply with the requirements as stated in the March 14, 2014 audit, the hearing officer found no basis to conclude the failure to comply was committed "Knowingly" *but rather appears to have been based on a failure to take seriously the staff recommendations as specified in not only the 2014 audit, but also, the 2011 audit and the 2012 follow-up audit.* (emphasis added)

The hearing officer states his final recommendation thusly: "It is the recommendation of the hearing officer that Security University's Certificate to Operate not be revoked, but that a lesser penalty be imposed" (p. 22).

- C. The hearing officer's suggestion notwithstanding, there is no "lesser penalty" provided in code or regulation. Council must either revoke or not revoke; if it does not revoke, it may establish conditions or actions for staff to follow to bring SU into compliance, but such conditions or actions should not have the character of a "penalty." Therefore, staff proposes a two-part approach to resolving this administrative action: (1) that SU's certificate to operate not be revoked at this time; and (2) that SU be put on a monitoring program for two years to assist it to come into full compliance. Accordingly, staff recommends that the Academic Affairs Committee adopt the following resolution and forward it to the full Council:

BE IT RESOLVED

- (i) that Security University's (SU's) certificate to operate in Virginia not be revoked at this time;**
- (ii) that SCHEV staff shall audit SU at approximate six month intervals through the period ending March 31, 2017;**

- (iii) that following the first three audits, SCHEV staff shall provide informational reports to SU with advice, if necessary, about how to come into compliance with Virginia regulation;
- (iv) that following the fourth and final audit, SCHEV staff shall prepare a Report of Audit that indicates (a) SU's progress toward full compliance during the two-year monitoring period, and (b) SU's final compliance status.

Materials Provided:

- **Appendix A:** Letter from Peter Blake, Director of SCHEV, to Ms. Sondra Schneider, CEO of Security University. Date: March 14, 2014.
- **Appendix B:** SCHEV Report on January 30-31 Audit of Security University. Date: March 14, 2014.
- **Appendix C:** "SCHEV's Response to Security University's Opposition to March 14, 2014, Audit," Assistant Attorney General Mike F. Melis. Date: December 5, 2014.
- **Appendix D:** Hearing Officer's "Findings of Fact, Conclusions, Decision and Recommendation." Date: March 10, 2015.
- **Appendix E:** Letter from Ms. Annie Wallker, Director of the Virginia Department of Veterans Services to the U.S. Department of Veterans Affairs, revoking Security University's approval to certify veterans' training, August 2, 2013.
- **Appendix F:** Letter from Mr. William V. Larkin, Executive Director of the Accrediting Council for Continuing Education and Training (ACCET), to Ms. Schneider, conveying final revocation of Security University's accreditation.

Financial Impact: N/A

Timetable for Further Review/Action: If SU remains out of compliance at the end of the recommended monitoring period, i.e., March 31, 2017, revocation proceedings may be instituted at that time that could eventually necessitate Council action.



COMMONWEALTH of VIRGINIA
STATE COUNCIL OF HIGHER EDUCATION FOR VIRGINIA
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Director

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March 14, 2014

Ms. Sondra Schneider
Founder & CEO
Security University
510 Spring Street, Suite 130
Herndon, VA 20170

Certified Mail: 7013 1090 0001 8595 2852

Dear Ms. Schneider:

I write to inform you that pursuant to Title 23, Chapter 21.1, §23-276.6, of the *Code of Virginia*, the State Council of Higher Education for Virginia (SCHEV), will seek to revoke Security University's Certificate to Operate on the basis of the school's failure to maintain compliance with Virginia regulation. At the audit conducted by SCHEV staff on January 30-31, 2014, Security University (SU) was found to have seven items of non-compliance and one item of concern. In accordance with 8 VAC 40-31-200(D) of the *Virginia Administrative Code*, following an audit, Council staff shall prepare a report with recommendations for review by the Council. The enclosed Report of Audit details the violations found and recommends revocation of the Certificate to Operate.

Pursuant to 8 VAC 40-31-220, Security University is entitled to an informal fact finding conference at a mutually convenient time within 60 days of the date of this notification. This conference will be presided over by a member of the SCHEV staff and will afford you the opportunity to present written and oral information that may have a bearing on the proposed action. You also have the right to waive an informal conference and go directly to a formal hearing. Formal hearings are conducted in accordance with § 2.2-4020 of the *Code of Virginia* and are presided over by a hearing officer selected from a list prepared by the Executive Secretary of the Supreme Court. In all such formal proceedings the parties are entitled to be accompanied by and represented by counsel, to submit oral and documentary evidence and rebuttal proofs, to conduct such cross-examination as may elicit a full and fair disclosure of the facts, and to have the proceedings completed and a decision made with dispatch.

Ms. Sondra Schneider
Security University
March 14, 2014

Please notify this office, in writing, by **Friday, March 28, 2014** if you wish to schedule an informal fact finding conference or if you prefer to proceed directly to a formal hearing. Failure to provide SCHEV with a written response by the date noted above shall constitute a waiver of the school's right to such appeals and SCHEV will move to present the recommendation to revoke Security University's *Certificate to Operate* at the next feasible Council meeting.

If you have any questions concerning this action, please contact Ms. Sylvia Rosa-Casanova at 804-225-3399 or sylviarosacasanova@schev.edu

Sincerely,



Peter Blake

Enclosure

c: The Honorable Anne Holton, Secretary of Education
Ms. Noelle Shaw-Bell, Assistant Attorney General, Education
Dr. Joseph G. DeFilippo, Director of Academic Affairs & Planning, SCHEV
Ms. Sylvia Rosa-Casanova, Director – POPE, SCHEV

STATE COUNCIL OF HIGHER EDUCATION FOR VIRGINIA

Report of Audit
Security University
Audit Date: January 30-31, 2014

Report Date: March 14, 2014

ITEMS OF NON-COMPLIANCE

1. REFUND POLICY IN VIOLATION OF VIRGINIA REGULATION Repeat Violation

8VAC 40-31-160(N) (1-13)

The school shall establish a tuition refund policy and communicate it to students. The school shall provide a period of at least three business days, excluding weekends and holidays, during which a student applicant may cancel his enrollment without financial obligation other than a nonrefundable fee not to exceed \$100. A student applicant may cancel, by written notice, his enrollment at any time prior to the first class day of the session for which application was made. When cancellation is requested under these circumstances, the school is required to refund all tuition paid by the student, less a maximum tuition fee of 15% of the stated costs of the course or program or \$100, whichever is less.

The minimum refund policy for a school that financially obligates the student for the entire amount of tuition and fees for the entirety of a program or course shall be as follows:

- a. A student who enters the school but withdraws or is terminated during the first quartile (25%) of the program shall be entitled to a minimum refund amounting to 75% of the cost of the program.
- b. A student who withdraws or is terminated during the second quartile (more than 25% but less than 50%) of the program shall be entitled to a minimum refund amounting to 50% of the cost of the program.
- c. A student who withdraws or is terminated during the third quartile (more than 50% but less than 75%) of the program shall be entitled to a minimum refund amounting to 25% of the cost of the program.
- d. A student who withdraws after completing more than three quartiles (75%) of the program shall not be entitled to a refund.

Finding:

Security University provided the following three documents as part of the audit materials requested:

- Student handbook
- Catalog
- Staff handbook

The student handbook is the only document that lists a compliant refund policy. It is SCHEV's refund policy, verbatim as appears in the Virginia Administrative Code. It is in a different font than the rest of the student handbook.

With one small difference, noted below, the other two documents list a refund policy that:

- a. Requires 20 business days notice prior to the start of class to receive a full refund
- b. Assesses a 25% cancellation fee if the student cancels less than 10 business days before the start of a class
- c. Assesses a 50% cancellation fee if the student cancels less than 5 business days before the start of a class
- d. Assesses a 100% no show fee if the student does not attend the class at all.
- e. Provides place in a future class of the same topic without additional fees if a student must withdraw due to a medical emergency. The option of a refund is not given.
- f. Provides the student with the opportunity to "request" a refund of 25% if he or she must leave prior to attending the third day of class. "No additional dollars will be refunded if they attended 3 days or greater." (The faculty handbook states 75% of the class fee can be "requested".)

According to Virginia regulation, a student who withdraws from a program of 40 hours in length must be entitled to the following tuition refunds:

| <u>Time attended</u> | <u>Refund Due</u> |
|---------------------------------|-------------------|
| Less than 10 hours | 75% |
| 10 hours but less than 20 hours | 50% |
| 20 hours but less than 30 hours | 25% |
| 30 hours or more | No Refund |

Furthermore, an applicant is entitled to a full refund prior to the first day of class, minus a maximum tuition fee of 15% or \$100, whichever is less. Security University's non-compliant refund policy, however, penalizes a student applicant 50% of the tuition if he cancels less than five days prior to the start of class.

The policy listed in the catalog and faculty handbook is in violation of Virginia regulation.

This is a repeat violation. In the Report of Audit dated December 22, 2011, Security University was cited for violating 8VAC40-31-160 (N). In a follow-up report dated April 5, 2012, Security University was notified that this item had not yet been corrected and was advised that repeat findings in future audits might lead to adverse administrative action including the suspension or revocation of the school's *Certificate to Operate*, pursuant to 8 VAC 40-31-200. Security University's failure to correct its refund policy after two written notifications constitutes flagrant disregard of Virginia regulation.



2. INSTITUTION DOES NOT FOLLOW ITS OWN ADMISSIONS POLICY

8VAC 40-31-160 (D)

The postsecondary school shall have, maintain, and provide to all applicants a policy document accurately defining the minimum requirements for eligibility for admission to the school.

Finding:

For the audit, Security University provided a student handbook, a catalog, and a staff handbook for SCHEV staff review.

The student registration and admissions policies listed in each of these documents are quoted below:

- Student handbook (page 27)
 - All students are required to register online at the Security University website REGISTER ME tab (<https://securityuniversity.net/reg.php>.)
 - The student agrees to pay the Security University fees indicated and adhere to the Security University policies.
 - Provide validation of registration requirements- resume and background check or a letter from employer validating the employer has performed a background check on the registered student.
 - Effective February 11, 2011, students must provide evidence of 12 months of professional work in information technology and relevant TCP/IP or IT security certifications certificate.
- Catalog (last page, unnumbered)
 - School's Registration Requirements: Evidence of Security+ Certification or 12 months professional work in information technology and relevant TCP/IP or IT security certifications you have attained.
- Staff handbook (14th page from rear of handbook, unnumbered)
 - All students must register online at the Security University website REGISTER ME tab (<https://securityuniversity.net/reg.php>.), the student agrees to pay the Security University fees indicated and adhere to the Security University policies and Provide validation of registration requirements- resume and background check or a letter from employer validating the employer has performed a background check on the registered student. Effective February 11, 2011, Security+ Certification or 12 months professional work in information technology and relevant TCP/IP or IT security certifications you have attained.

During the audit, SCHEV staff requested to see the files that document each student's eligibility for admission to the program he/she enrolled in as per the admissions/registration requirement. The school proprietor, Ms. Sondra Schneider, did not provide these documents. Ms. Schneider implausibly asserted that the stated admissions policies are only applicable to students who wish to enroll in the Q/ISP program and there are no admissions requirements for any other programs. Since all three documents state the same policy and logic dictates that enrollment in many of the programs offered by Security University requires a level of knowledge and experience in the field for successful completion, SCHEV concludes that Security University does not follow its own stated admissions policy and is therefore in violation of Virginia regulation.



3. INSTITUTION DOES NOT MEET STANDARDS OF TRAINING IN THE FIELD

8VAC 40-31-150 (C)(1)

Courses of study conform to state, federal, trade, or manufacturing standards of training for the occupational fields in which such standards have been established or conform to recognized training practices in those fields.

Finding:

Security University teaches courses billed as leading to certifications provided by external organizations. To meet recognized training practice for such programs, an institution must (a) provide training that is recognized by the certifying organization and (b) must ensure that students meet all eligibility requirements to sit for the exam once they have completed the program.

Security University fails to meet standards of training in at least eleven of its program offerings, as listed in the table below.

| Certification Name | Company providing certification | Deficiency noted |
|--|---------------------------------|---|
| CWNA | CWNP | <p>Security University is not a CWNP Authorized Learning Partner</p> <p>In its brochure, Security University asserts that taking a Q/WP & Q/WSP Bootcamp Class is “all you need to know to pass CWNA & CWSP exam.” Q/WP and Q/WSP are Security University’s own certifications and do not meet industry standards for CWNA recognized training.</p> |
| CWSP | CWNP | <p>Security University is not a CWNP Authorized Learning Partner</p> <p>In its brochure, Security University asserts that taking a Q/WP & Q/WSP Bootcamp Class is “all you need to know to pass CWNA & CWSP exam.” Q/WP and Q/WSP are Security University’s own certifications and do not meet industry standards for CWSP recognized training.</p> |
| Certified Information Systems Security Professional With concentration in: Information Systems Security Architecture Professional (ISSAP) Concentration CISSP-ISSEP | ISC ² | Security University is not listed as an (ISC) ² Official Training Provider. |
| Certified Information Systems Security Professional -CISSP | ISC ² | <p>Security University is not listed as an (ISC)² Official Training Provider.</p> <p>A minimum of five years of direct full-time security work experience in two or more of domains of the (ISC)² CISSP CBK® is required for</p> |

| | | |
|--|------------------|---|
| | | <p>candidates to sit for exam. By its own admission, Security University does not require proof of experience for enrollment.</p> |
| SSCP | ISC ² | <p>Security University is not listed as an (ISC)² Official Training Provider.</p> <p>For the SSCP certification, a candidate is required to have a minimum of one year of cumulative paid full-time work experience in one or more of the seven domains of the SSCP CBK to sit for exam. By its own admission, Security University does not require proof of experience for enrollment.</p> |
| <p>Certified Ethical Hacker (CEH)</p> <p>Computer Hacking Forensic Investigation (CHFI)</p> <p>Licensed Penetration Tester (LPT)</p> | EC Council | <p>To be eligible to sit for the exam, candidate must (1) Attend official training; or (2) Have at least two years of information security related experience. By its own admission, Security University does not require proof of experience for enrollment.</p> <p>EC Council has confirmed that Security University is no longer an official training site.</p> <p>Security University calls its program "penetration tester license." As licensure is not through EC Council, it is unclear which organization, if any, provides licensure.</p> |
| Certified Information Systems Auditor (CISA) | ISACA | <p>A minimum of 5 years of professional information systems auditing, control or security work experience (as described in the CISA job practice areas) is required for certification. Substitutions and waivers of such experience, to a maximum of 3 years, may be obtained under certain circumstances. By its own admission, Security University does not require proof of experience for enrollment.</p> |
| Certified Information Security Manager (CISM) | ISACA | <p>A minimum of five years of information security work experience, with a minimum of three years of information security management work experience in three or more of the job practice areas. By its own admission,</p> |

| | | |
|--|-------|---|
| | | Security University does not require proof of experience for enrollment. |
| Cisco Certified Network Associate Wireless (CCNA Wireless) | Cisco | Prerequisites: Any valid Cisco CCENT, CCNA Routing and Switching or any CCIE certification and 1-3 years experience. By its own admission, Security University does not require proof of experience for enrollment Security University is not an authorized learning partner with Cisco; however, Cisco-approved training is recommended but not required. |

Security University does not conform to recognized training practices for the programs listed above for three reasons:

- 1) Security University is not recognized as a training provider by ISC², EC Council or CWNP.
- 2) Security University, by its own admission, does not require students to provide proof of experience in the field prior to enrolling in these programs.
- 3) Security University falsely claims that training for its own certifications will prepare students to pass certification exams by outside organizations that set their own certification standards

Security University has continued to offer programs for which it is not officially recognized as a training provider by organizations that provide the certifications the programs are billed as leading toward. This practice violates 8VAC 40-31-150 (C)(1), and threatens to injure students who would be unable to sit for certification exams after attending Security University.



4. COURSE CATALOG CONTAINS FALSE, INACCURATE OR MISLEADING INFORMATION

8VAC 40-31-160 (K)(2)

All recruitment personnel must provide prospective students with current and accurate information on the school through the use of written and electronic materials. No school shall knowingly make any statement or representation that is false, inaccurate or misleading regarding the school.

Finding:

Security University’s catalog, brochure, student handbook, and staff handbook contain multiple instances of information that is false, inaccurate, and/or misleading. The following are examples of items that violate Virginia regulation:

1. Security University Brochure

- a. **Claim:** “Advance your degree with Q/ISP IA CyberSecurity Graduate Certificate”
Violation: Security University is a vocational school and is not authorized to operate as a degree granting institution in Virginia. As such, it cannot offer “graduate certificates”. This statement is false, inaccurate, and misleading.
- b. **Claim:** “Q/ISP Cybersecurity Graduate or Master Certificate”.
Violation: This implies that Security University, a vocational school, has the authority to confer graduate certificates. This statement is false, inaccurate, and misleading.
- c. **Claim:** “No Classroom Needed”
Violation: This implies that Security University has distance education classes; however, Ms. Sondra Schneider has repeatedly denied that the school provides any distance education. This statement is misleading.
- d. **Claim:** The brochure states that students who enroll in CISSP or COMPTIA Security+ courses have a 98% pass rate.
Violation: Certification in CISSP or COMPTIA Security+ is granted by ISC² and COMPTIA respectively. Security University, by its own admission, does not collect data on the pass rate of students taking certification exams given by an outside company. Therefore, there is no basis on which Security University can make this claim. This statement is false, inaccurate and misleading.
- e. **Claim:** Security University bills itself as a legitimate provider of CISSP training when in fact, it is not.
Violation: In small print, the brochure states “CISSP is a registered trademark of (ISC)²” and “Security University CISSP classes are not endorsed, sponsored or delivered by (ISC)².” However, Security University uses the registered, recognized and trademarked name “CISSP” throughout its brochure, catalog and student handbook. This usage amounts to a claim that Security University is an authorized training provider for CISSP. A tiny print disclaimer in a footnote is not sufficient to protect students from taking a course that will not qualify them for the certification in question.

2. Student Handbook

- a. **Claim:** Page 13: “That does not imply other University’s (sic) will automatically accept Security University credits or certs (sic).”
Violation: Security University cannot award credits because it is not a degree granting institution. This statement is false, inaccurate and misleading.
- b. **Claim:** Pages 31-34: Course listings state the number of “credits” earned for each course.
Violation: Security University cannot award credits because it is not a degree granting institution. This statement is false, inaccurate and misleading.

3. Staff Handbook

- a. **Claim:** Unnumbered page: “Credit Transfer Program: Our credit transfer program is a comprehensive academic review of your employees’ prior academic work to determine credit that can be applied towards degree programs. The program allows your employees to earn university credit for successful completion of courses and can significantly lessen the time and money to complete their program.”

- b. **Violation:** This statement implies that Security University can award university credit. Security University is certified as a vocational-technical school and cannot award university credit. As a non-degree school, it is not competent to determine credit. This statement is false, inaccurate and misleading.

4. Catalog, Brochure, and Student Handbook

- a. Some programs Security University offers were created by Security University and it is stated that the “certification is maintained and granted Security University Testing LLC.” The descriptions for these programs are misleading.
 - i. Security University certifications are all preceded by the word “Qualified” and are named very similarly to certifications offered by other companies such as EC Council and CWNP. This makes it very easy for potential students to confuse these programs with those offered by companies that are recognized as industry standards. Indeed, an executive from EC Council informed SCHEV, in an email, that they have “case examples where students have purchased this “Q/EH” course thinking they were purchasing the official, Government approved CEH Certification we own. Due to the nature of this organization, we have had no choice but to terminate all business dealings and affiliations.”
 - ii. Security University uses misleading language to describe its own programs:
 - (1) “The Q/ISP certificate and related certifications provides THE only means of identifying and certifying “qualified persons. ”
 - (2) Referring to the Q/ISP certification: “Earn the most valued set of security certification /licenses in the world”
 - (3) “...thousands of companies and government agencies can trust the “Qualified” trustmark (sic).”

The above are egregious examples of misrepresentations made by Security University. If intentional, these misrepresentations constitute knowing attempts to recruit students using deceptive practices. If unintentional, they are indicative of incompetence. In either case they constitute a massive collection of violations of Virginia regulation.



5. INSTITUTION DOES NOT MAINTAIN STUDENT RECORDS IN ACCORDANCE WITH VIRGINIA REGULATION

8VAC 40-31-160 (E)(2)(4)

The postsecondary school shall maintain records on all enrolled students. These records shall include:

A transcript of the student's academic or course work at the school, which shall be retained permanently in either hard copy forms or in an electronic database with backup.

Finding:

Security University could not provide student transcripts that included all courses the student had taken and the final outcome for each course. Furthermore, on page 11 of the student handbook, Security University states that student records are maintained for seven years and may be removed prior to that if the student's “qualification expires,” which appears to be a

reference to Security University's own certifications. A student is therefore required to continue taking courses offered by the school as a condition of Security University maintaining records of his academic work. Virginia requires that student transcripts be retained permanently, without qualification.

Security University's policy on records maintenance is in blatant violation of Virginia regulation, and appears to be a predatory practice intended to prolong students' enrollment with Security University.



6. INSTITUTION ADVERTISES PROGRAMS THAT DO NOT MEET STANDARDS FOR QUALITY, CONTENT AND LENGTH

8VAC 40-31-150 (B)

The course, program, curriculum and instruction must be of quality, content and length to adequately achieve the stated objective.

Finding:

Security University advertises two years of Unlimited Security Training for \$11,000 (brochure) and one year of Security University classes for \$11,000 (catalog). Neither of these is compliant with Virginia regulation. Such open ended agreements do not conform to quality, content and length of programs because they are ambiguous and cannot be quantified. Enrollment agreements must specifically detail the program name, costs, and dates of attendance so students know exactly what they are agreeing to and are obliged to pay for.

This practice is particularly injurious to students who enroll and do not take more than one or two classes, given Security University's non-compliant refund policy discussed above.



7. INSTITUTION IS INTENTIONALLY AMBIGUOUS ABOUT ITS NON-DEGREE STATUS

8VAC 40-31-10 (Definitions)

"University" means any institution offering programs leading to degrees or degree credit beyond the baccalaureate level.

Finding:

The name "Security University" is inaccurate since by definition, a university offers programs beyond the baccalaureate level and Security University is a career technical school and therefore is not authorized even to offer bachelor's level credit. SCHEV admits that it committed an error when it allowed Security University to obtain certification using "university" in its name. The fact remains that the name "Security University" is not compliant with Virginia code and regulation, and also contradicts the generally accepted meaning of the term "university." Security University intentionally blurs the lines between what they are (a non-degree vocational school) and what their name implies (a degree granting institution). As the review of their catalog, brochure, student handbook, and staff handbook clearly shows, Security University

uses terminology that is reserved for use by degree granting institutions. This indicates a lack of regard for representing itself accurately to current and potential students.

ITEM OF CONCERN

ACCREDITATION STATUS

Security University is currently accredited by the Accrediting Council for Continuing Education and Training (ACCET) as an institution that provides avocational training. During a recent audit of Security University by ACCET, the school's status as an avocational training provider was questioned by the accrediting agency. In a February 26, 2014 email, Ms. Schneider requested SCHEV to attest to ACCET that Security University's programming is avocational. SCHEV responded as follows:

Security University classes are not avocational. Avocational programs are intended solely for recreation, enjoyment, personal interest, or as a hobby. SCHEV does not certify institutions that provide only avocational programs. You are required to certify because you provide vocational training meant to prepare students for jobs/careers.

As accreditation requirements for vocational training are more rigorous than those for avocational training, such misrepresentation would benefit Security University by precluding it from adhering to stricter accreditation guidelines. Security University's representation to ACCET that it provides avocational training is deceptive.



SCHEV AUDIT TEAM RECOMMENDATION

Pursuant to 8VAC 40-31-200 (D), following an audit of a postsecondary institution certified to operate in Virginia, SCHEV staff shall prepare a report with recommendations.

SUMMARY OF FINDINGS FROM THE AUDIT OF SECURITY UNIVERSITY CONDUCTED ON JANUARY 30-31, 2014

1. The refund policy quoted in two of the three documents presented to SCHEV by Security University penalizes a student even before the class has officially begun. This is a clear violation of Virginia Administrative Code. SCHEV cited Security University for this same violation in its 2011 audit.
2. Security University does not follow its own stated admissions policy. While Security University attempted to persuade SCHEV staff that its stated admissions policy was only applicable to one program, all three documents presented to SCHEV at the time of the audit state the same admissions policy and do not limit its application to a specific program. The claim by Security University that all three documents are wrong is unconvincing.
3. Security University does not apply appropriate admissions requirements to students enrolling in courses that require experience in the field prior to sitting for certification exams. Security University's negligence in verifying the student's experience can result

in a student being ineligible to sit for a certification exam after paying for a course at Security University. This constitutes a breach of professional ethics.

4. Security University continues to advertise that it teaches programs that require certification by outside companies (such as EC Council, ISC² and CWNP) although it is no longer an authorized training provider for those companies. This constitutes a breach of professional ethics.
5. Security University's catalogs, brochures, staff handbook and student handbook are riddled with falsehoods, inaccuracies and/or misleading statements. A reasonable reader's perception of the school based solely on information provided in these documents would be far from the truth. The fact that Security University flagrantly misleads students is a violation of Virginia Administrative Code.
6. Security University's management of student records does not meet the standards required of institutions certified to operate in the Commonwealth of Virginia. Instead of maintaining records in the format required by entities operating as postsecondary schools, Security University treats the records as "business" records, and disposes of them if students do not maintain enrollment in Security University's programs. Student academic records must be maintained in the form of a transcript, and must not ever be destroyed or disposed. Security University's practices in these regards violate the Virginia Administrative Code.
7. Security University's advertised Unlimited Security Training at a cost of \$11,000 is not compliant with Virginia regulation and does not conform to quality, content and length required of approved training. Enrollment in such a program will not provide students with adequate protections in the event of withdrawal. The offer of such training, neither approved nor vetted by SCHEV, is a predatory practice on the part of an institution that already unlawfully penalizes students for withdrawing from a class prior to its commencement.
8. Security University's ambiguity about its non-degree status in its brochure, catalog and student handbook appears to be a deliberate attempt to misrepresent itself to current and potential students.
9. Security University has demonstrated a recent pattern of difficulty maintaining itself in good standing with external agencies.
 - On August 2, 2013, the Virginia Department of Veteran's Services' State Approving Agency for Veterans Education and Training (SAA) revoked Security University's approval to offer training to veterans.
 - On August 22, 2013, ACCET issued an Institutional Show Cause based on three reasons: (1) the results of Security University's review by SAA (2) the withdrawal of Security University's approval to offer training to veterans, and (3) Security University's offering of programs that were not approved ACCET.

While adverse actions from the accrediting agency and the Department of Veteran's Services are not in themselves violations of Virginia regulations governing postsecondary education, they are indicative of problems maintaining compliance with external standards of good practice and quality. The relevance of this inference is supported by the numerous findings detailed above in this report.

Final Recommendation

Security University is in violation of multiple provisions of 8VAC 40-31 et. seq. designed to protect students from predatory institutions. The violations identified above touch on some of the most fundamental provisions in the *Code of Virginia* and the *Virginia Administrative Code* related to minimal standards of academic quality and fair treatment of students. The number and kind of violations identified in this report document (a) a chronic pattern of misleading practices and (b) a chronic—and therefore apparently willful—inability to maintain compliance with Virginia regulation.

SCHEV staff recommends that Council revoke Security University's *Certificate to Operate* as a postsecondary institution in the Commonwealth of Virginia.



COMMONWEALTH of VIRGINIA

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December 5, 2014

*Via E-Mail (davidrsmith@cox.net)
and UPS Delivery*
David R. Smith, Esq.
3527 Laurel Leaf Lane
Fairfax, Virginia 22031

Re: Security University v. SCHEV

Dear Mr. Smith:

Enclosed please find SCHEV's Response to Security University's Opposition to March 14, 2014, Audit. If you have any questions or need any additional information, I can be reached at (804) 371-7965. Thank you for your time and attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mike F. Melis".

Mike F. Melis
Assistant Attorney General

Enclosure

cc: Stephen C. Shannon, Esq. (via e-mail and UPS delivery)

SECURITY UNIVERSITY

v.

Hearing Date: 12/10/14

**STATE COUNCIL OF HIGHER
EDUCATION FOR VIRGINIA (SCHEV).**

**SCHEV'S RESPONSE TO SECURITY UNIVERSITY'S
OPPOSITION TO MARCH 14, 2014, AUDIT**

In accordance with its statutory duty under Va. Code § 23-276.3 to protect students pursuing postsecondary education opportunities, on January 30-31, 2014, SCHEV staff conducted an audit of Security University (SU), a postsecondary school operating under a SCHEV certification and subject to SCHEV regulations. Based on its audit findings, SCHEV has determined that SU is in violation of multiple regulations and, therefore, SU's certification must be revoked. SCHEV's 2014 Report of Audit (SCHEV Ex. 1 and attached) details multiple violations which warrant revocation. Perhaps even more alarming than SU's failure to comply with any particular regulation cited in the report is SU's pattern of non-compliance, over time and spanning multiple agencies. Thus revocation of SU's certificate is necessary for the reasons set forth in the 2014 Report of Audit, particularly when viewed in combination and in the context of SU's ongoing pattern of non-compliance. This memorandum responds to SU's Opposition to the Audit Report and provides further explanation and amplification of the bases for revocation set forth therein.

As to SU's pattern of non-compliance, it is demonstrated by multiple SCHEV exhibits. For example, SCHEV's 2011 Report of Audit (SCHEV Ex. 13) documents SU's non-compliance with regulations at that time. And again, in 2012, SCHEV noted SU's continuing deficiencies in a 2012 Follow-Up Report of Audit (SCHEV Ex. 16). Prior to its operations in Virginia, SU received cease and desist letters from the Connecticut Department of Higher Education arising

from SU's offering courses in Connecticut without approval and noting SU's improper use of the term "university." Connecticut Dept. of Higher Education letters (SCHEV Ex. 19). In 2013, due to what it determined was "a pattern of willful inaccuracy" in SU's enrollment certifications that resulted in the inflation of GI Bill payouts, the Virginia Department of Veterans Services withdrew its approval of SU to provide certification tests to veterans. COV Dept. of Veterans Services letter (SCHEV Ex. 18). Finally, SU is facing loss of its accreditation due to multiple deficiencies noted by its independent accrediting agency. ACCET letter (SCHEV Ex. 17).

I. ARGUMENT

As the original applicant for SCHEV certification, the burden of proof is on SU to establish that it is in compliance with applicable regulations. Va. Code § 2.2-4020(C). And, as the state agency charged with regulating postsecondary education, SCHEV's interpretation of its own regulations is entitled to deference. *See, e.g., Lifecare Medical Transports, Inc. v. Virginia Department of Medical Assistance Services*, 63 Va. App. 538, 548, 759 S.E.2d 35, 40 (2014).

A. Violation #1: Refund Policy In Violation Of Virginia Regulation (Repeat Violation).

In accordance with Va. Code § 23-276.3, 8 VAC 40-31-160(N) requires SU to "establish a tuition refund policy and communicate it to students." The regulation then sets forth the minimum refund policy which schools must establish and communicate. 8 VAC 40-31-160(N)(1)-(13). At the time of SCHEV's audit, the refund policy communicated to students in SU's Catalog (SCHEV Ex. 11) and Staff Handbook (SCHEV Ex. 10) did not comply with the minimum requirements of the applicable regulation. 2014 Report of Audit at 1-2 (SCHEV Ex. 1). And as of December 1, 2014, SU continues to communicate a non-compliant refund policy. *See Excerpts* (SCHEV Ex. 12).

During the May 1, 2014, informal fact finding conference (minutes 13:42 - 17:00), SU stated that it has corrected the refund policy in the Catalog and Staff Handbook and that it is posted on the website in PDF form. On December 1, 2014, SCHEV reviewed the website and found the following. The website has a link to "SU policies" which has one PDF link for the "student handbook" and another to the "catalog". Both links lead to the May 2014 catalog. Both PDF documents list a non-compliant refund policy (different than any other the school listed in any document reviewed by SCHEV) and the website itself lists the same non-compliant refund policy. As such, while at the time of the audit there was at least one SU document that communicated a compliant refund policy - based on the website - there is now none.

SU has failed to comply with this requirement since at least its 2011 audit. 2011 Report of Audit at 1 (SCHEV Ex. 13). And in 2012, SCHEV again notified SU that it still was not in compliance with the regulation. 2012 Follow-Up Report of Audit at 5 (SCHEV Ex. 16). At that time, SCHEV advised that repeat findings in future audits could lead to adverse administrative action, including suspension or revocation of SU's Certificate to Operate pursuant to 8 VAC 40-31-200. But, notwithstanding at least three written notifications of non-compliance since 2011, SU continues to disregard its obligation to communicate a refund policy that meets minimum requirements.

In its Opposition, SU does not assert the refund policy communicated in its Catalog and Staff Handbook did not comply with the regulation. *See* SU Opposition at 1. Instead, SU argues that the discrepancies in SU documents "were mere editorial oversight, not intentionally misleading, and never brought up as an issue of concern by a student." SU Opposition at 1. But, even assuming it is true, this argument ignores the repeated and ongoing nature of SU's violation. SU further argues that, in its fourteen years of operation, "only 8 of its approximately

23,000 enrolled students have ever requested a refund” and those students received a 100% refund. *Id.* This argument is problematic for at least three reasons. First, SU has provided no documentation of refunds. Indeed, during the 2014 audit, SU represented that *no* student has asked for a refund, but now asserts that precisely eight out of 23,000 have done so in the past fourteen years. Second, under the minimum requirements, a refund, if due to a student, need not be *requested* by a student in all cases. And finally, this argument ignores the fact that students may not have been aware of the opportunity for a 100% refund if SU was operating under one of its published, non-compliant refund policies.

B. Violation #2: Institution Does Not Follow Its Own Admissions Policy

Pursuant to 8 VAC 40-31-160(D):

The postsecondary school shall have, maintain, and provide to all applicants a policy document accurately defining the minimum requirements for eligibility for admission to the school and for acceptance at the specific degree level or into all specific degree programs offered by the postsecondary school that are relevant to the school's admissions standards.

At the time of the 2014 audit, SU's Student Handbook (SCHEV Ex. 9 at 27), Catalog (SCHEV Ex. 11 at last unnumbered page) and Staff Handbook (SCHEV Ex. 10 at 14th unnumbered page from rear) all contained admissions policies that - on their face - applied to all students intending to register for SU classes. During the audit, SCHEV asked to see student files that document students' eligibility and SU's application of its requirements for admission consistent with SU's stated policies. Such documentation is necessary to establish that SU actually applies its policy as stated and that the policy, in fact, accurately defines the minimum requirements for admission. SU has yet to produce such documentation.

During the audit, SU further indicated that the stated admissions policies are only applicable to students who wish to enroll in a particular program and that there are no admissions

requirements for any other programs. In its opposition, SU asserts that two admission requirements in its policy - a resume and background check - are necessary only for certain programs, while the remaining requirements are necessary for all programs. But regardless of which of these two positions SU takes, SU's admissions policies make no such distinctions between programs. And, absent sufficient documentation of SU's actual application of its admissions policies, SU cannot establish that the policies accurately define the minimum requirements for admission as required by 8 VAC 40-31-160(D).

Finally, the timing of payments for enrolling students remains a concern for SCHEV. SU's admissions policy requires students to pay up front, even before anyone at SU has assessed whether the student is qualified for admission. In its opposition, SU argues that the timing of payments should not be an issue because SU provides full refunds if requested and companies are not willing to pay for a student's enrollment if the candidate is not qualified for admission. But SU's argument regarding companies' incentives does not address *individuals* who may pay to be enrolled without having qualifications for admission. And, SU's requirement that payment be provided up front remains problematic given the potential confusion regarding SU's actual refund policy referenced above.

C. Violation #3: Institution Does Not Meet Standards Of Training In The Field.

Pursuant to 8 VAC 40-31-150(D)(1), SU is required to certify that “[c]ourses of study conform to state, federal, trade, or manufacturing standards of training for the occupational fields in which such standards have been established or conform to recognized training practices in those fields.” SU teaches courses billed as leading to certification provided by external organizations. Generally, the purpose of such courses is to prepare students for technical and/or specialized certifications. To meet the standards of training for such certifications, SU must

provide training that is recognized by the external certifying organization and must ensure that students meet all eligibility requirements to sit for the exam once they have completed SU's program.

In the 2014 Report of Audit, SCHEV identified eleven SU programs that SU claims will lead to certification by an external organization. 2014 Report of Audit at 4-6 (SCHEV Ex. 1). But the external certifying organizations for these programs do not recognize SU as a training provider and, therefore, have not verified that the training provided by SU is sufficient to obtain their certification. Moreover, SU does not require students to provide proof of experience required by various certifying organizations for a student to sit for their exam.

In its Opposition, SU notes that the CNSS has approved certain SU courses, certifying that those courses meet a national training standard. But SCHEV understands this certification to apply only to certain courses created by SU with examinations and certifications designed, maintained and issued by SU - as opposed to courses SU designates as leading to certifications offered by external organizations. Thus, this argument does not address SU's violation of 8 VAC 40-31-150(D)(1). The only way SCHEV can ensure that courses designated for obtaining an external certification conform to recognized training practices, is to require that SU be recognized as a training provider by the external organization.

SU also argues in its opposition that, pursuant to *International Information Systems Security Certification Consortium, Inc. v. Security University, LLC*, trademark law permits SU to use a certain external organization's certification mark in SU's advertising. SU Opposition at 3. But SU's reliance on this case involving trademark law is misplaced. While the court may have ruled that SU did not infringe on a trademark, the court did not address whether SU violated 8

VAC 40-31-150(D)(1) by designating certain courses as leading to certification by the external organization without the organization's recognizing SU as a provider for such training.

Finally, SU claims that SCHEV provides no authority in support of its position that SU must ensure that students meet all eligibility requirements to sit for a certifying exam once students have completed SU's program. In doing so, SU ignores SCHEV's general statutory and regulatory duty to protect students pursuing postsecondary education opportunities. *See, e.g.,* Va. Code 23-276.3. SU further ignores the traditional deference afforded to an agency's interpretation of its own regulations regarding areas of law entrusted to the agency. *See, e.g., Lifecare Medical Transports, Inc.,* 63 Va. App. at 548, 759 S.E.2d at 40. The potential for confusion - or even abuse - is obvious in a situation such as this, where a student pays for and enrolls in a class seeking certification, only to learn upon completion that he or she is ineligible to sit for the certifying examination.

D. Violation #4: False, Inaccurate Or Misleading Information.

Pursuant to 8 VAC 40-31-160(K)(2):

All recruitment personnel must provide prospective students with current and accurate information on the school through the use of written and electronic materials . . . No school, agent, or admissions personnel shall knowingly make any statement or representation that is false, inaccurate or misleading regarding the school.

As identified in the 2014 Report of Audit at pages 6-8, SU's catalog, brochure, student handbook, and staff handbook contain multiple instances of information that is false, inaccurate and/or misleading. SU's arguments in their Opposition are addressed below:

1. "Graduate Certificate" or "Master Certificate" claims.

SU disputes that the terms "graduate" and "master" are not exclusive to degrees. It cites the use of these terms by the University of Richmond, Villanova, and IBM. But SU's attempt to

compare its use of the terms “master” and “graduate” to the manner in which University of Richmond, Villanova, and IBM use similar terms is unconvincing because of the inherent differences between SU and these other institutions. The University of Richmond and Villanova are both accredited, degree granting institutions and authorized in their respective states to award graduate degrees and graduate certificates. Course offerings at such institutions cannot be compared to offerings by SU - a non-degree postsecondary school that was accredited as an avocational school, which means that its programs are not reviewed with the level of thoroughness required for vocational programs. Thus, statements made by SU in its brochure claiming “CyberSecurity Graduate Certificate” and “Advance your degree with Q/ISP” are misleading. As for IBM, it is a corporation that trains people to achieve certifications in its own material. It is not subject to regulation as a postsecondary school.

2. “No Classroom Needed” claim.

SU explains the term “No Classroom needed” as referring to the “online preparation before the 5 day in person class which the brochure indicates is ‘hands on training’.” SU Opposition at 4. SU says it removed this language from its 2011 brochure. But, during the 2014 audit, SU’s explanation for using the term “No Classroom needed” was because an iPad loaded with the class lecture was given to the student as part of the tuition package at the end of the course to study for the exam. Regardless of the change in explanation, the term remains misleading because it implies that SU provides distance education classes when it does not. Moreover, SU’s statement that it removed this language from its 2011 brochure is incorrect because the same language was noted during the 2014 audit.

3. “98% Pass Rate” claim.

SU denies SCHEV’s finding that, despite having insufficient data to support its claim, SU advertises a 98% pass rate for certain certification exams administered by two external certifying organizations (ISC² and COMPTIA). 2014 Report of Audit at 7 (SCHEV Ex. 1); SU Opposition at 5. During the 2014 audit, SU stated that it does not collect data on the pass rate for certifying exams administered by outside organizations. But in its Opposition, SU argues that it is a proctor for an exam administered by COMPTIA and provides information regarding that pass rate, as well as the pass rate for exams SU offers and administers itself based on SU classes. For the exam administered by ISC², SU argues that it offers free courses to students who fail and, therefore, it benefits students to report failures. SU argues that its claim of a 98% pass rate is based on the results of information gathered via these means.

Notwithstanding its arguments, SU has yet to provide SCHEV with any documentation supporting its 98% pass rate claim. Moreover, that SU can readily collect information regarding its own examinations and certifications has never been at issue. It is pass rate statistics the school claims for exams that are given by other certifying agencies that are at issue. SU’s claim that students have an incentive to report their failure of an exam administered by an outside certifying organization is not sufficient to support 98% class rate claim - particularly when SU has provided no data supported by documentation as opposed to unsupported conclusions based on students’ incentives. Indeed, SCHEV understands that SU does not have actual data to support a pass rate claim for exams that are administered by an outside organization such as ISC².

4. “Credits” awarded or transferred claim.

SU disagrees with SCHEV’s finding that SU’s use of the term “credit” or “university credit” as something that SU awards or can be transferred is misleading. 2014 Report of Audit at 7-8 (SCHEV Ex. 1); SU Opposition at 5. SU cannot award credits because it is not a degree granting institution. SU’s use of the term “credit” or “university credit” is misleading because a student may believe that he or she is earning the equivalent of a credit conferred by a degree granting institution and that such credits are transferrable to a degree granting institution.

SU argues that it can use the term “credit” and awards and/or transfers credits in some situations - such as awarding Continuing Education Units (CEU) in the cyber security field and having a memorandum of understanding for the transfer of credits with Capital College, which SU claims to be a degree granting institution. But CEUs, on their face, are not credits granted by a degree granting institution. SU is free to identify CEUs that can be earned by taking a particular class - assuming the claim is accurate. As for the memorandum of understanding, it has not been produced to SCHEV.

5. Misleading program descriptions.

As indicated in the 2014 Report of Audit, some programs SU offers were created by SU, but the descriptions for these programs are misleading. 2014 Report of Audit at 8 (SCHEV Ex. 1). Specifically, certifications created and awarded by Security University are all preceded by the word “Qualified” and have similar names as certifications offered by outside certifying organizations. Students can confuse SU’s programs and certifications with those offered by companies that are recognized as industry standards. SCHEV is aware of at least one organization (EC Council) that will not transact business or affiliate with SU because students have purchased and completed an SU created course while thinking they were obtaining the

certification offered by the outside organization. 2014 Report of Audit at 8 (SCHEV Ex. 1). As noted, SU also uses misleading and unsupported language to describe the quality and recognition of programs it develops and offers. *Id.* SU does not specifically respond to SCHEV's findings regarding the misleading nature of SU's descriptions. Instead, SU refers to its argument regarding SCHEV's finding that SU's programs for obtaining certain certifications do not meet standards of industry in the field because they are not recognized by the outside certifying organizations. This argument is addressed in section C above.

E. Violation #5: Institution Does Not Maintain Student Records In Accordance With Virginia Regulation.

Pursuant to 8 VAC 40-31-160(E)(2):

The postsecondary school shall maintain records on all enrolled students. At a minimum, these records shall include . . . [a] transcript of the student's academic or course work at the school, which shall be retained permanently in either hard copy forms or in an electronic database with backup by the school, its successors, or its assigns.

During the 2014 audit, SU could not provide student transcripts that included all courses the student had taken and the final outcome for each course. Also, the student handbook, stated that student records are maintained for seven years instead of in perpetuity, and may be removed before seven years if a student stops taking SU courses. 2014 Report of Audit at 8-9 (SCHEV Ex. 1).

In its Opposition, SU claims that it maintains transcripts permanently on a cloud server as well as in local backup for seven years and produced transcripts for two students as proof. But SU provides no explanation for its inability to provide transcripts upon SCHEV's request at the audit, or for its initial claim that it does not permanently maintain transcripts.

F. Violation #6: Institution Advertises Programs That Do Not Meet Standards For Quality, Content and Length.

Pursuant to 8 VAC 40-31-150(B), “The course, program, curriculum and instruction [offered by a career-technical school] must be of quality, content and length to adequately achieve the stated objective.” During the 2014 audit, SCHEV discovered that SU advertises two years of Unlimited Security Training for \$11,000 and one year of Security University classes for \$11,000. 2014 Report of Audit at 9 (SCHEV Exhibit 1). Such an agreement is not tethered to an objective and does not describe the quality, content and length of a program to reach an objective.

In its Opposition, SU argues that the length and content of its classes are stated in its literature. SU Opposition at 7. SU further claims that its refund policy is sufficient to protect students who seek to cancel their enrollment under this offer. *Id.* But SCHEV’s duty to protect students suffices to require schools to enroll students for specific courses for a specific period of time. In the event of school closure, the enrollment records are used to determine refunds for unearned tuition. Contracts such as SU’s, which are not linked to a specific objective, do not comply with 8 VAC 40-31-150(B). And as for SU’s argument regarding its refund policy, SCHEV relies on the arguments set forth in section A, above.

G. Violation #7: Institution Is Intentionally Ambiguous About Its Non-Degree Status.

Under 8 VAC 40-31-10 (Definitions), “‘University’ means any institution offering programs leading to degrees or degree credit beyond the baccalaureate level.” SU argues that SCHEV allowed SU to call itself “Security University” and that SU does not promise a degree to its students. SU Opposition at 7. But SCHEV’s concern is the combination of SU calling itself a university and other statements in its literature such as the use of “graduate” and “master” to describe certain certificates it offers, the use of the term “credit,” and promises to “advance your

degree.” SU’s self-identification as a “university” and use of this language is misleading in that the combination appears to describe a degree granting institution.

II. CONCLUSION

Based on the 2014 Report of Audit, the exhibits submitted by SCHEV, and all the foregoing reasons, SCHEV respectfully requests that the hearing officer return a determination that SU’s certification to operate be revoked.

Respectfully submitted,

STATE COUNCIL OF HIGHER
EDUCATION FOR VIRGINIA

By: 
Counsel

December 5, 2014

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STATE COUNCIL OF HIGHER EDUCATION FOR VIRGINIA

Report of Audit
Security University
Audit Date: January 30-31, 2014

Report Date: March 14, 2014

ITEMS OF NON-COMPLIANCE

1. REFUND POLICY IN VIOLATION OF VIRGINIA REGULATION Repeat Violation

8VAC 40-31-160(N) (1-13)

The school shall establish a tuition refund policy and communicate it to students. The school shall provide a period of at least three business days, excluding weekends and holidays, during which a student applicant may cancel his enrollment without financial obligation other than a nonrefundable fee not to exceed \$100. A student applicant may cancel, by written notice, his enrollment at any time prior to the first class day of the session for which application was made. When cancellation is requested under these circumstances, the school is required to refund all tuition paid by the student, less a maximum tuition fee of 15% of the stated costs of the course or program or \$100, whichever is less.

The minimum refund policy for a school that financially obligates the student for the entire amount of tuition and fees for the entirety of a program or course shall be as follows:

- a. A student who enters the school but withdraws or is terminated during the first quartile (25%) of the program shall be entitled to a minimum refund amounting to 75% of the cost of the program.
- b. A student who withdraws or is terminated during the second quartile (more than 25% but less than 50%) of the program shall be entitled to a minimum refund amounting to 50% of the cost of the program.
- c. A student who withdraws or is terminated during the third quartile (more than 50% but less than 75%) of the program shall be entitled to a minimum refund amounting to 25% of the cost of the program.
- d. A student who withdraws after completing more than three quartiles (75%) of the program shall not be entitled to a refund.

Finding:

Security University provided the following three documents as part of the audit materials requested:

- Student handbook
- Catalog
- Staff handbook

The student handbook is the only document that lists a compliant refund policy. It is SCHEV's refund policy, verbatim as appears in the Virginia Administrative Code. It is in a different font than the rest of the student handbook.

With one small difference, noted below, the other two documents list a refund policy that:

- a. Requires 20 business days notice prior to the start of class to receive a full refund
- b. Assesses a 25% cancellation fee if the student cancels less than 10 business days before the start of a class
- c. Assesses a 50% cancellation fee if the student cancels less than 5 business days before the start of a class
- d. Assesses a 100% no show fee if the student does not attend the class at all.
- e. Provides place in a future class of the same topic without additional fees if a student must withdraw due to a medical emergency. The option of a refund is not given.
- f. Provides the student with the opportunity to "request" a refund of 25% if he or she must leave prior to attending the third day of class. "No additional dollars will be refunded if they attended 3 days or greater." (The faculty handbook states 75% of the class fee can be "requested".)

According to Virginia regulation, a student who withdraws from a program of 40 hours in length must be entitled to the following tuition refunds:

| <u>Time attended</u> | <u>Refund Due</u> |
|---------------------------------|-------------------|
| Less than 10 hours | 75% |
| 10 hours but less than 20 hours | 50% |
| 20 hours but less than 30 hours | 25% |
| 30 hours or more | No Refund |

Furthermore, an applicant is entitled to a full refund prior to the first day of class, minus a maximum tuition fee of 15% or \$100, whichever is less. Security University's non-compliant refund policy, however, penalizes a student applicant 50% of the tuition if he cancels less than five days prior to the start of class.

The policy listed in the catalog and faculty handbook is in violation of Virginia regulation.

This is a repeat violation. In the Report of Audit dated December 22, 2011, Security University was cited for violating 8VAC40-31-160 (N). In a follow-up report dated April 5, 2012, Security University was notified that this item had not yet been corrected and was advised that repeat findings in future audits might lead to adverse administrative action including the suspension or revocation of the school's *Certificate to Operate*, pursuant to 8 VAC 40-31-200. Security University's failure to correct its refund policy after two written notifications constitutes flagrant disregard of Virginia regulation.



2. INSTITUTION DOES NOT FOLLOW ITS OWN ADMISSIONS POLICY

8VAC 40-31-160 (D)

The postsecondary school shall have, maintain, and provide to all applicants a policy document accurately defining the minimum requirements for eligibility for admission to the school.

Finding:

For the audit, Security University provided a student handbook, a catalog, and a staff handbook for SCHEV staff review.

The student registration and admissions policies listed in each of these documents are quoted below:

- Student handbook (page 27)
 - All students are required to register online at the Security University website REGISTER ME tab (<https://securityuniversity.net/reg.php>.)
 - The student agrees to pay the Security University fees indicated and adhere to the Security University policies.
 - Provide validation of registration requirements- resume and background check or a letter from employer validating the employer has performed a background check on the registered student.
 - Effective February 11, 2011, students must provide evidence of 12 months of professional work in information technology and relevant TCP/IP or IT security certifications certificate.
- Catalog (last page, unnumbered)
 - School's Registration Requirements: Evidence of Security+ Certification or 12 months professional work in information technology and relevant TCP/IP or IT security certifications you have attained.
- Staff handbook (14th page from rear of handbook, unnumbered)
 - All students must register online at the Security University website REGISTER ME tab (<https://securityuniversity.net/reg.php>.), the student agrees to pay the Security University fees indicated and adhere to the Security University policies and Provide validation of registration requirements- resume and background check or a letter from employer validating the employer has performed a background check on the registered student. Effective February 11, 2011, Security+ Certification or 12 months professional work in information technology and relevant TCP/IP or IT security certifications you have attained.

During the audit, SCHEV staff requested to see the files that document each student's eligibility for admission to the program he/she enrolled in as per the admissions/registration requirement. The school proprietor, Ms. Sondra Schneider, did not provide these documents. Ms. Schneider implausibly asserted that the stated admissions policies are only applicable to students who wish to enroll in the Q/ISP program and there are no admissions requirements for any other programs. Since all three documents state the same policy and logic dictates that enrollment in many of the programs offered by Security University requires a level of knowledge and experience in the field for successful completion, SCHEV concludes that Security University does not follow its own stated admissions policy and is therefore in violation of Virginia regulation.



3. INSTITUTION DOES NOT MEET STANDARDS OF TRAINING IN THE FIELD

8VAC 40-31-150 (C)(1)

Courses of study conform to state, federal, trade, or manufacturing standards of training for the occupational fields in which such standards have been established or conform to recognized training practices in those fields.

Finding:

Security University teaches courses billed as leading to certifications provided by external organizations. To meet recognized training practice for such programs, an institution must (a) provide training that is recognized by the certifying organization and (b) must ensure that students meet all eligibility requirements to sit for the exam once they have completed the program.

Security University fails to meet standards of training in at least eleven of its program offerings, as listed in the table below.

| Certification Name | Company providing certification | Deficiency noted |
|--|---------------------------------|---|
| CWNA | CWNP | <p>Security University is not a CWNP Authorized Learning Partner</p> <p>In its brochure, Security University asserts that taking a Q/WP & Q/WSP Bootcamp Class is "all you need to know to pass CWNA & CWSP exam." Q/WP and Q/WSP are Security University's own certifications and do not meet industry standards for CWNA recognized training.</p> |
| CWSP | CWNP | <p>Security University is not a CWNP Authorized Learning Partner</p> <p>In its brochure, Security University asserts that taking a Q/WP & Q/WSP Bootcamp Class is "all you need to know to pass CWNA & CWSP exam." Q/WP and Q/WSP are Security University's own certifications and do not meet industry standards for CWSP recognized training.</p> |
| Certified Information Systems Security Professional With concentration in: Information Systems Security Architecture Professional (ISSAP) Concentration CISSP-ISSEP | ISC ² | Security University is not listed as an (ISC) ² Official Training Provider. |
| Certified Information Systems Security Professional -CISSP | ISC ² | <p>Security University is not listed as an (ISC)² Official Training Provider.</p> <p>A minimum of five years of direct full-time security work experience in two or more of domains of the (ISC)² CISSP CBK® is required for</p> |

| | | |
|--|------------------|---|
| | | <p>candidates to sit for exam. By its own admission, Security University does not require proof of experience for enrollment.</p> |
| SSCP | ISC ² | <p>Security University is not listed as an (ISC)² Official Training Provider.</p> <p>For the SSCP certification, a candidate is required to have a minimum of one year of cumulative paid full-time work experience in one or more of the seven domains of the SSCP CBK to sit for exam. By its own admission, Security University does not require proof of experience for enrollment.</p> |
| <p>Certified Ethical Hacker (CEH)</p> <p>Computer Hacking Forensic Investigation (CHFI)</p> <p>Licensed Penetration Tester (LPT)</p> | EC Council | <p>To be eligible to sit for the exam, candidate must (1) Attend official training; or (2) Have at least two years of information security related experience. By its own admission, Security University does not require proof of experience for enrollment.</p> <p>EC Council has confirmed that Security University is no longer an official training site.</p> <p>Security University calls its program "penetration tester license." As licensure is not through EC Council, it is unclear which organization, if any, provides licensure.</p> |
| Certified Information Systems Auditor (CISA) | ISACA | <p>A minimum of 5 years of professional information systems auditing, control or security work experience (as described in the CISA job practice areas) is required for certification. Substitutions and waivers of such experience, to a maximum of 3 years, may be obtained under certain circumstances. By its own admission, Security University does not require proof of experience for enrollment.</p> |
| Certified Information Security Manager (CISM) | ISACA | <p>A minimum of five years of information security work experience, with a minimum of three years of information security management work experience in three or more of the job practice areas. By its own admission,</p> |

| | | |
|--|-------|--|
| | | Security University does not require proof of experience for enrollment. |
| Cisco Certified Network Associate Wireless (CCNA Wireless) | Cisco | <p>Prerequisites: Any valid Cisco CCENT, CCNA Routing and Switching or any CCIE certification and 1-3 years experience. By its own admission, Security University does not require proof of experience for enrollment</p> <p>Security University is not an authorized learning partner with Cisco; however, Cisco-approved training is recommended but not required.</p> |

Security University does not conform to recognized training practices for the programs listed above for three reasons:

- 1) Security University is not recognized as a training provider by ISC², EC Council or CWNP.
- 2) Security University, by its own admission, does not require students to provide proof of experience in the field prior to enrolling in these programs.
- 3) Security University falsely claims that training for its own certifications will prepare students to pass certification exams by outside organizations that set their own certification standards

Security University has continued to offer programs for which it is not officially recognized as a training provider by organizations that provide the certifications the programs are billed as leading toward. This practice violates 8VAC 40-31-150 (C)(1), and threatens to injure students who would be unable to sit for certification exams after attending Security University.



4. COURSE CATALOG CONTAINS FALSE, INACCURATE OR MISLEADING INFORMATION

8VAC 40-31-160 (K)(2)

All recruitment personnel must provide prospective students with current and accurate information on the school through the use of written and electronic materials. No school shall knowingly make any statement or representation that is false, inaccurate or misleading regarding the school.

Finding:

Security University's catalog, brochure, student handbook, and staff handbook contain multiple instances of information that is false, inaccurate, and/or misleading. The following are examples of items that violate Virginia regulation:

1. Security University Brochure

- a. **Claim:** "Advance your degree with Q/ISP IA CyberSecurity Graduate Certificate"
Violation: Security University is a vocational school and is not authorized to operate as a degree granting institution in Virginia. As such, it cannot offer "graduate certificates". This statement is false, inaccurate, and misleading.
- b. **Claim:** "Q/ISP Cybersecurity Graduate or Master Certificate".
Violation: This implies that Security University, a vocational school, has the authority to confer graduate certificates. This statement is false, inaccurate, and misleading.
- c. **Claim:** "No Classroom Needed"
Violation: This implies that Security University has distance education classes; however, Ms. Sondra Schneider has repeatedly denied that the school provides any distance education. This statement is misleading.
- d. **Claim:** The brochure states that students who enroll in CISSP or COMPTIA Security+ courses have a 98% pass rate.
Violation: Certification in CISSP or COMPTIA Security+ is granted by ISC² and COMPTIA respectively. Security University, by its own admission, does not collect data on the pass rate of students taking certification exams given by an outside company. Therefore, there is no basis on which Security University can make this claim. This statement is false, inaccurate and misleading.
- e. **Claim:** Security University bills itself as a legitimate provider of CISSP training when in fact, it is not.
Violation: In small print, the brochure states "CISSP is a registered trademark of (ISC)²" and "Security University CISSP classes are not endorsed, sponsored or delivered by (ISC)²." However, Security University uses the registered, recognized and trademarked name "CISSP" throughout its brochure, catalog and student handbook. This usage amounts to a claim that Security University is an authorized training provider for CISSP. A tiny print disclaimer in a footnote is not sufficient to protect students from taking a course that will not qualify them for the certification in question.

2. Student Handbook

- a. **Claim:** Page 13: "That does not imply other University's (sic) will automatically accept Security University credits or certs (sic)."
Violation: Security University cannot award credits because it is not a degree granting institution. This statement is false, inaccurate and misleading.
- b. **Claim:** Pages 31-34: Course listings state the number of "credits" earned for each course.
Violation: Security University cannot award credits because it is not a degree granting institution. This statement is false, inaccurate and misleading.

3. Staff Handbook

- a. **Claim:** Unnumbered page: "Credit Transfer Program: Our credit transfer program is a comprehensive academic review of your employees' prior academic work to determine credit that can be applied towards degree programs. The program allows your employees to earn university credit for successful completion of courses and can significantly lessen the time and money to complete their program."

- b. **Violation:** This statement implies that Security University can award university credit. Security University is certified as a vocational-technical school and cannot award university credit. As a non-degree school, it is not competent to determine credit. This statement is false, inaccurate and misleading.

4. Catalog, Brochure, and Student Handbook

- a. Some programs Security University offers were created by Security University and it is stated that the "certification is maintained and granted Security University Testing LLC." The descriptions for these programs are misleading.
- i. Security University certifications are all preceded by the word "Qualified" and are named very similarly to certifications offered by other companies such as EC Council and CWNP. This makes it very easy for potential students to confuse these programs with those offered by companies that are recognized as industry standards. Indeed, an executive from EC Council informed SCHEV, in an email, that they have "case examples where students have purchased this "Q/EH" course thinking they were purchasing the official, Government approved CEH Certification we own. Due to the nature of this organization, we have had no choice but to terminate all business dealings and affiliations."
- ii. Security University uses misleading language to describe its own programs:
- (1) "The Q/ISP certificate and related certifications provides THE only means of identifying and certifying "qualified persons. "
 - (2) Referring to the Q/ISP certification: "Earn the most valued set of security certification /licenses in the world"
 - (3) "...thousands of companies and government agencies can trust the "Qualified" trustmark (sic)."

The above are egregious examples of misrepresentations made by Security University. If intentional, these misrepresentations constitute knowing attempts to recruit students using deceptive practices. If unintentional, they are indicative of incompetence. In either case they constitute a massive collection of violations of Virginia regulation.



5. INSTITUTION DOES NOT MAINTAIN STUDENT RECORDS IN ACCORDANCE WITH VIRGINIA REGULATION

8VAC 40-31-160 (E)(2)(4)

The postsecondary school shall maintain records on all enrolled students. These records shall include:

A transcript of the student's academic or course work at the school, which shall be retained permanently in either hard copy forms or in an electronic database with backup.

Finding:

Security University could not provide student transcripts that included all courses the student had taken and the final outcome for each course. Furthermore, on page 11 of the student handbook, Security University states that student records are maintained for seven years and may be removed prior to that if the student's "qualification expires," which appears to be a

reference to Security University's own certifications. A student is therefore required to continue taking courses offered by the school as a condition of Security University maintaining records of his academic work. Virginia requires that student transcripts be retained permanently, without qualification.

Security University's policy on records maintenance is in blatant violation of Virginia regulation, and appears to be a predatory practice intended to prolong students' enrollment with Security University.



6. INSTITUTION ADVERTISES PROGRAMS THAT DO NOT MEET STANDARDS FOR QUALITY, CONTENT AND LENGTH

8VAC 40-31-150 (B)

The course, program, curriculum and instruction must be of quality, content and length to adequately achieve the stated objective.

Finding:

Security University advertises two years of Unlimited Security Training for \$11,000 (brochure) and one year of Security University classes for \$11,000 (catalog). Neither of these is compliant with Virginia regulation. Such open ended agreements do not conform to quality, content and length of programs because they are ambiguous and cannot be quantified. Enrollment agreements must specifically detail the program name, costs, and dates of attendance so students know exactly what they are agreeing to and are obliged to pay for.

This practice is particularly injurious to students who enroll and do not take more than one or two classes, given Security University's non-compliant refund policy discussed above.



7. INSTITUTION IS INTENTIONALLY AMBIGUOUS ABOUT ITS NON-DEGREE STATUS

8VAC 40-31-10 (Definitions)

"University" means any institution offering programs leading to degrees or degree credit beyond the baccalaureate level.

Finding:

The name "Security University" is inaccurate since by definition, a university offers programs beyond the baccalaureate level and Security University is a career technical school and therefore is not authorized even to offer bachelor's level credit. SCHEV admits that it committed an error when it allowed Security University to obtain certification using "university" in its name. The fact remains that the name "Security University" is not compliant with Virginia code and regulation, and also contradicts the generally accepted meaning of the term "university." Security University intentionally blurs the lines between what they are (a non-degree vocational school) and what their name implies (a degree granting institution). As the review of their catalog, brochure, student handbook, and staff handbook clearly shows, Security University

uses terminology that is reserved for use by degree granting institutions. This indicates a lack of regard for representing itself accurately to current and potential students.

ITEM OF CONCERN

ACCREDITATION STATUS

Security University is currently accredited by the Accrediting Council for Continuing Education and Training (ACCET) as an institution that provides avocational training. During a recent audit of Security University by ACCET, the school's status as an avocational training provider was questioned by the accrediting agency. In a February 26, 2014 email, Ms. Schneider requested SCHEV to attest to ACCET that Security University's programming is avocational. SCHEV responded as follows:

Security University classes are not avocational. Avocational programs are intended solely for recreation, enjoyment, personal interest, or as a hobby. SCHEV does not certify institutions that provide only avocational programs. You are required to certify because you provide vocational training meant to prepare students for jobs/careers.

As accreditation requirements for vocational training are more rigorous than those for avocational training, such misrepresentation would benefit Security University by precluding it from adhering to stricter accreditation guidelines. Security University's representation to ACCET that it provides avocational training is deceptive.



SCHEV AUDIT TEAM RECOMMENDATION

Pursuant to 8VAC 40-31-200 (D), following an audit of a postsecondary institution certified to operate in Virginia, SCHEV staff shall prepare a report with recommendations.

SUMMARY OF FINDINGS FROM THE AUDIT OF SECURITY UNIVERSITY CONDUCTED ON JANUARY 30-31, 2014

1. The refund policy quoted in two of the three documents presented to SCHEV by Security University penalizes a student even before the class has officially begun. This is a clear violation of Virginia Administrative Code. SCHEV cited Security University for this same violation in its 2011 audit.
2. Security University does not follow its own stated admissions policy. While Security University attempted to persuade SCHEV staff that its stated admissions policy was only applicable to one program, all three documents presented to SCHEV at the time of the audit state the same admissions policy and do not limit its application to a specific program. The claim by Security University that all three documents are wrong is unconvincing.
3. Security University does not apply appropriate admissions requirements to students enrolling in courses that require experience in the field prior to sitting for certification exams. Security University's negligence in verifying the student's experience can result

in a student being ineligible to sit for a certification exam after paying for a course at Security University. This constitutes a breach of professional ethics.

4. Security University continues to advertise that it teaches programs that require certification by outside companies (such as EC Council, ISC² and CWNP) although it is no longer an authorized training provider for those companies. This constitutes a breach of professional ethics.
5. Security University's catalogs, brochures, staff handbook and student handbook are riddled with falsehoods, inaccuracies and/or misleading statements. A reasonable reader's perception of the school based solely on information provided in these documents would be far from the truth. The fact that Security University flagrantly misleads students is a violation of Virginia Administrative Code.
6. Security University's management of student records does not meet the standards required of institutions certified to operate in the Commonwealth of Virginia. Instead of maintaining records in the format required by entities operating as postsecondary schools, Security University treats the records as "business" records, and disposes of them if students do not maintain enrollment in Security University's programs. Student academic records must be maintained in the form of a transcript, and must not ever be destroyed or disposed. Security University's practices in these regards violate the Virginia Administrative Code.
7. Security University's advertised Unlimited Security Training at a cost of \$11,000 is not compliant with Virginia regulation and does not conform to quality, content and length required of approved training. Enrollment in such a program will not provide students with adequate protections in the event of withdrawal. The offer of such training, neither approved nor vetted by SCHEV, is a predatory practice on the part of an institution that already unlawfully penalizes students for withdrawing from a class prior to its commencement.
8. Security University's ambiguity about its non-degree status in its brochure, catalog and student handbook appears to be a deliberate attempt to misrepresent itself to current and potential students.
9. Security University has demonstrated a recent pattern of difficulty maintaining itself in good standing with external agencies.
 - On August 2, 2013, the Virginia Department of Veteran's Services' State Approving Agency for Veterans Education and Training (SAA) revoked Security University's approval to offer training to veterans.
 - On August 22, 2013, ACCET issued an Institutional Show Cause based on three reasons: (1) the results of Security University's review by SAA (2) the withdrawal of Security University's approval to offer training to veterans, and (3) Security University's offering of programs that were not approved ACCET.

While adverse actions from the accrediting agency and the Department of Veteran's Services are not in themselves violations of Virginia regulations governing postsecondary education, they are indicative of problems maintaining compliance with external standards of good practice and quality. The relevance of this inference is supported by the numerous findings detailed above in this report.

Final Recommendation

Security University is in violation of multiple provisions of 8VAC 40-31 et. seq. designed to protect students from predatory institutions. The violations identified above touch on some of the most fundamental provisions in the *Code of Virginia* and the *Virginia Administrative Code* related to minimal standards of academic quality and fair treatment of students. The number and kind of violations identified in this report document (a) a chronic pattern of misleading practices and (b) a chronic—and therefore apparently willful—inability to maintain compliance with Virginia regulation.

SCHEV staff recommends that Council revoke Security University's *Certificate to Operate* as a postsecondary institution in the Commonwealth of Virginia.

On July 15, 2014, pursuant to §2.2-4020 of the Code of Virginia, the undersigned was appointed as the hearing officer to recommends finding of facts and a decision, to include conclusions and a recommendation addressing SCHEV's assertion that Security University is in violation of various sections of the Virginia Administrative Code administered by SCHEV.

A pre-hearing conference call was held on October 24, 2014 in which the parties agreed to hold the hearing on December 10, 2014. Prior to the actual hearing, the parties exchanged their respective list of witnesses and exhibits on December 5, 2014.

B. Witnesses and Exhibits:

On the day of hearing and prior to the beginning of testimony, the representatives of SCHEV and Security University discussed the transcription of the Informal Fact Finding Hearing ("IFF"), which was held on May 1, 2014. The written transcription of the IFF was included in Security University's Exhibits submitted on December 5, 2014 as Exhibit No. 5. SCHEV submitted a CD Audio version of the IFF. (SCHEV Ex. 4). The initial transcription did not have the correct names associated with the party actually speaking at the IFF hearing. The updated Exhibit 5 corrected this and was admitted to the record with no objection. All other documents that the parties had exchanged on December 5, 2014 that were to be considered as part of the record were admitted; however, at the hearing, Security University introduced two additional exhibits that were admitted without objection as Exhibits 24 and 25.

The exhibits referenced herein will be identified as SCHEV Exhibit ("SCHEV Ex. 1 - ___"), or Security University Exhibit ("SU Ex.1 - ___").

The witnesses who testified at the hearing for the parties were as follows:

Security University: Mr. Chris Mercer
Ms. Helen Reynolds
Mr. Tony Sager
Mr. Ken Cutler
Mr. Brad Boute
Ms. Sondra Schneider

SCHEV: Ms. Sylvia Rosa-Casanova
Ms. Josephine Wright

C. The Record:

The Record in this matter consists of the following:

1. The October 24, 2014 Pre-hearing conference call memorandum ;
2. SCHEV’s March 14, 2014 “Report of Audit,” including the Items of Noncompliance and Items of Concern (“2014 Audit”);
3. Security University’s Opposition to SCHEV’s March 14, 2014 Audit;
4. SCHEV’s Response to Security University’s Opposition to March 14, 2014 Audit dated December 5, 2014;
5. The list of witnesses and exhibits submitted on December 5, 2014 by Security University, (Exhibits 1 through 23 and Exhibits 24 and 25 admitted at the hearing);
6. The list of witnesses and exhibits submitted on December 5, 2014 by SCHEV (Exhibits 1 through 19);
7. The Transcript of the December 10, 2014 hearing (“Transcript,” or “Tr.”);
8. Security University’s Proposed Findings of Fact and Conclusions and Statement of Reasons dated February 25, 2015, submitted pursuant to 8 VAC 40-31-220(D);
9. SCHEV’s proposed Findings of Fact and Conclusions dated March 4, 2015, submitted pursuant to 8 VAC 40-31-220(D); .

D. Relevant Authority:

- i) VA Code § 23-276.3; 8 VAC 40-31-200 (D)
- ii) Regulations pertaining to allegations of Security University’s Non-Compliance:
 - (1) 8 VAC 40-31-160(N) (1-13): Among other things states: “The school shall establish a tuition refund policy and communicate it to students.

- (2) 8 VAC 40-31-160(D): “The postsecondary school shall have, maintain, and provide to all applicants a policy document accurately defining the minimum requirements for eligibility for admission to the school.”
- (3) 8 VAC 40-31-150(C)(1): “Courses of study conform to state, federal, trade, or manufacturing standards of training for the occupational fields in which Security University standards have been established or conform to recognized training practices in those fields.”
- (4) 8 VAC 40-31-160(K)(2): “All recruitment personnel must provide prospective students with current and accurate information on the school through the use of written and electronic materials. No school shall knowingly make any statement or representation that is false, inaccurate or misleading regarding the school.”
- (5) 8 VAC 40-31-160(E) (2)(4): “The postsecondary school shall maintain records on all enrolled students. These records shall include: A transcript of the student’s academic or course work at the school, which shall be retained permanently in either hard copy forms or in an electronic database with backup.”
- (6) 8 VAC 40-31-150 (B); “The course program, curriculum and instruction must be of quality, content and length to adequately achieve the stated objective.”
- (7) 8 VAC 40-31-10 (Definitions): “University” means any institution offering programs leading to degrees or degree credit beyond the baccalaureate level.”

II. Pursuant to Va. Code § 2.2-4020(C), Security University has the burden of proof in this matter.

III. FINDINGS OF FACTS

1. Security University is in the business of providing cybersecurity/information security education and training and has done so since 1999. (Tr., pg. 86-87). Security University received its Certificate to Operate in Virginia from SCHEV in 2006 (Tr. pg. 252).

2. The average age of students who have attended classes at Security University ranges from thirty-Five (35) to Fifty-Five (55). (Tr. pg. 90). During the time period in which Security University has operated over 23,000 students have enrolled in classes offered by Security University. (Tr. pgs. 254).

3. In accordance with Va. Code §23-276.3, SCHEV has the duty to protect students pursuing postsecondary educational opportunities from predatory practices. (Tr. pg.175). SCHEV's Private and Out-of-State Postsecondary Education ("POPE") division is responsible for certifying and monitoring both private and out-of-state postsecondary schools in Virginia (Tr. pg. 174), this responsibility includes ensuring schools are complying with applicable Virginia statutes and regulations. (Tr. pgs. 175-176).

4. Security University's certification is to operate in Virginia as a vocational postsecondary institution. Security University does not offer college type credits such as those permitting a student to obtain a college baccalaureate degree; but rather, Security University is a non-degree granting institution (Tr. ,pg. 63).

5. On January 30-31, 2014, SCHEV conducted an audit of Security University in accordance with 8VAC 40-31-200 (D) of the Virginia Code. The report of the audit was completed on March 14, 2014 ("2014 Audit"), (SU Ex. 7; SCHEV Ex. 13). SCHEV conducted the 2014 Audit due to a notice from the Virginia Department of Veteran's Services of its decision to withdraw Security University's approval to provide courses to veterans (Tr. Pg. 177; SCHEV Ex. 18). The 2014 Audit was also due to information that SCHEV received from ACCT, Security University's accreditation agency. (Tr. pg. 177).

6. The 2014 Audit was sent to Security University in a cover letter dated March 14, 2014 which advised Security University that SCHEV would be seeking to revoke Security University's Certificate to Operate, pursuant to Title 23, Chapter 21.1 §23-276.6 of the Code of Virginia. The basis for this decision was SCHEV's conclusion that Security University had failed to maintain compliance with Virginia regulations. (SCHEV Ex. 1; SU Ex. 7).

7. Security University was also advised that pursuant to 8 VAC 40-31-220 it was entitled to an informal fact finding (“IFF”) conference, for it to present information that may have a bearing on the action proposed by SCHEV (SCHEV Ex. 3). Pursuant to 8 VAC 40-31-220.

8. Security University requested an informal fact finding conference (“IFF”) which was held on May 1, 2014. Attendees at the IFF were from SCHEV, Dr. Joseph DeFilippo, and Director of Academic Affairs at SCHEV, Ms. Sylvia Rosa-Casanova, Director, Private and Out-of-State Postsecondary Education for SCHEV, Ms. Josephine Wright, Compliance Investigator for SCHEV and Ms Sandra Freeman. Participants for Security University were Ms. Sondra Schneider, owner and founder of Security University and Ms. Florence Tate, Security University consultant. (SU Ex. 5; SCHEV Ex. 4).

9. Security University was not able to present information at the IFF that persuaded SCHEV to not seek the revocation of its Certificate to Operate (SCHEV Ex. 5)..

10. By letter dated June 18, 2014, (SCHEV Ex. 7), Security University was advised of the findings outlined in SCHEV’s 2014 Audit that recommended Security University’s Certificate to Operate in Virginia be revoked. Security University was also advised it had the right to request a formal hearing before a hearing officer assigned by the Virginia Supreme Court pursuant to 8 VAC 40-31-220(B). (SCHEV Ex. 1; SU Ex. 7).

11. SEHEV had previously conducted an audit of Security University in 2011 (“2011 Audit”), (SCHEV Ex. 13; SU Ex. 6), with a follow-up audit in 2012. (SCHEV Ex. 16). The audits were conducted pursuant to 8 VAC 40-31-200 (D). The 2014 Audit listed seven (7) allegations of non-compliance by Security University resulting in the SCHEV staff recommending that Security University’s certificate to operate in Virginia be revoked. (SU Ex. 7; SCHEV Ex. 1).

VIOLATION NO. 1: “The Refund Policy In Violation of Virginia Regulation (Repeat Violation)

8VAC 40-31-160(N) (1-13): The school shall establish a tuition refund policy and communicate it to students.

12. The first violation listed in the 2014 audit was that Security University was out of compliance with the tuition refund policy. The refund policy was also an issue before SCHEV in the 2011 audit (Tr. pg. 135). As a result of the 2011 audit, Security University divided its original documentation providing information about it and the courses it offers from a single document into three (3) separate documents; a Student Handbook (SU Ex. 3; SCHEV Ex. 9), Staff Handbook (SU Ex. 4; SCHEV Ex. 10) and a Catalogue (SU Ex. 2; SCHEV Ex. 11).

13. SCHEV determined that Security University’s refund policy as stated in its Staff Handbook Course Catalogue were in violation of 8 VAC 40-31-160 (N), that, among other things, requires that “The school shall establish a tuition refund policy and communicate it to students.” SCHEV concluded the information about the refund policy was misleading because different language was in the documents Security University created. Even though the Staff Handbook and Catalogue were determined to be non-compliant Security University’s Student Handbook contained a compliant refund policy. (Tr., pg. 184-185, 192).

14. The Course Catalog and Staff Handbooks as written, are not in compliance for stating a refund policy different from what is stated in the regulations (Tr. pgs. 183-186), but were due to an “editorial oversight.” For example, Security University’s refund policy as set forth in the Course Catalog and Staff Handbook requires 20 business day notice prior to the start of class to receive a full refund; assesses a 25% cancellation fee if the student cancels less than 10 business days before the start of a class; assesses a 50% cancellation fee if the student cancels less than 5 business days before the start of a class; assess a 100% no show fee if the student does not attend the class at all; provides place in a future

class of the same topic without additional fees if a student must withdraw due to a medical emergency; provides the student with the opportunity to request a refund of 25% if the student must leave prior to attending the third day of class. (SCHEV Ex. 1; SU Ex. 7). The hearing officer finds this language to be non-compliant with the applicable regulation.

15. Virginia regulations requires the following for a program of 40 hours in length: a 75% refund for less than 10 hours, 50% refund for 10 hours but less than 20 hours; 25% refund for 20 hours but less than 30 hours and no refund for 30 hours or more (2014 Audit; SCHEV Ex. 1; SU Ex. 7). The hearing officer finds the language in the Staff Handbook and Catalogue are noncompliant with the regulations.

16. Notwithstanding a finding of noncompliance with regard to the Catalog and Staff Handbook, there is no finding that that the non-compliance was knowingly or willfully committed, but were inadvertent and not deliberate (Tr. pg. 275).

17. Even though there are inconsistency in the three (3) documents that Security University produced that describe a refund policy, there have been nine (9) requests for a refund from Security University since 1999 and none of the requests for a full refund were denied (Transcript pgs. 139-141). Furthermore, there have been no complaints from a student to SCHEV concerning the Security University refund policy. (Tr. pg. 254).

18. As stated herein and in the 2014 Audit, the Course Catalog and Staff Handbook are noncompliant with the Virginia Regulations with regard to the student refund policy; however, the 2014 Audit did not state that the non-compliance was knowingly or willful committed (Tr. pg. 184-185, 192, 275) and the hearing officer finds credible the testimony of Ms. Schneider that the noncompliant refund policy was not a willful violation of the regulations.

VIOLATION NO. 2: Institution Does Not Follow Its Own Admissions Policy.

8 VAC 40-31-160(D): “The postsecondary school shall have, maintain, and provide to all applicants a policy document accurately defining the minimum requirements for eligibility for admission to the school. ”

19. The 2014 Audit states, among other things that Security University is noncompliant with 8 VAC 40-31-160 (D) in that it does not follow its own Admissions Policy. SCHEV concluded that Security University’s Student Handbook (SCHEV Ex. 9 at 27; SU Ex. 3), Catalog (SCHEV Ex. 11; SU Ex. 2) at last number page) and Staff Handbook (SU Ex. 4; SCHEV Ex. 10, at 14th unnumbered page from the rear) contained admissions policies that applied to students intending to register for Security University classes.

20. During the 2014 audit, SCHEV requested to see files from randomly selected students to determine if the files document the student’s eligibility and application requirements for admission to show consistency with Security University’s practice (Tr. pgs. 192-193); however, no files were provided (Tr. pg. 195).

21. Security University disputed the allegation of noncompliance with regard to failing to maintain minimum requirements for eligibility for admission. Ms. Schneider (Transcript pg. 90) stating Security University has a minimum requirement that a prospective student must have an understanding of “TCP/IP, ” before being admitted to attend one of Security University’s 5-Day courses. (Tr. pg. 98); Security University Ex. 9). One prospective student who did not have this TCP/IP background was advised to seek education courses at a Community College in information security before applying to Security University. (Tr., pgs.98-99; SU Ex. 8).

22. Security University’s admission policy with regard to the requirement for a background in TCP/IP was presented through testimony of Mr. Chris Mercer, a former Security University student, who testified that he explained his TCP/IP background prior to being admitted into Security University

(Tr. pg. 17). Additionally, Ms. Helen Reynolds a current student at Security University also testified about her 20 years of experience in TCP/IP prior to enrolling at Security University. (Transcript pg. 26). The hearing officer finds the testimony of Mr. Mercer and Ms. Reynolds credible and that Security University follows its admissions policy with regard to student admission concerning their needing to know TCP/IP as a prerequisite to being admitted into Security University.

VIOLATION # 3: Institution Does Not Meet Standards of Training In the Field.

8 VAC 40-31-150(C)(1): “Courses of study conform to state, federal, trade, or manufacturing standards of training for the occupational fields in which Security University standards have been established or conform to recognized training practices in those fields.”

23. SCHEV made a finding in the 2014 Audit that “Security University teaches courses billed as leading to certifications provided by external organizations, (Tr. pgs. 201- 202), but that Security University failed to meet the standards of training in at least eleven of its program offerings. (SCHEV Ex. 1; SU Ex. 7).

24. The 2014 audit report lists eleven (11) Security University programs that it states as leading to certification by external organizations; however, SCHEV concluded that the external organizations referenced by Security University do not recognize Security University as a training provider or that the training offered by Security University is sufficient to obtain a certification (Tr. pgs. 203-206).

25. There were no documents submitted for the hearing officer to consider as part of this Findings of Fact, from the external organizations either confirming or denying whether the training offered by Security University was acceptable in terms of a student receiving a certificate in the cybersecurity or information security fields. SCHEV’s 2014 Audit lists the eleven (11) areas, heading as “Deficiency noted;” (SCHEV Ex. 1; SU Ex. 7). However, even though the organizations referred to in the 2014 Audit have not indicated they recognized Security University as a training provider or

verified that the training provided by Security University is sufficient to obtain a certification, there was no evidence that a student trained by Security University could not sit for an examination leading to a certification offered by the institutions listed. (Tr. 204-205). Mr. Ken Cutler, a teacher at Security University since 2011 testified credibly that no student had complained to him about not obtaining a degree by taking courses at Security University (Tr. pg. 63).

26. Security University disputed the allegation of noncompliance and presented Mr. Tony Sager, a former National Security Agency (“NSA”) employee of 34 years, who testified that Security University was one of the places the NSA would look to for training its employees (Transcript, pgs. 45-46). The hearing officer finds the testimony of Mr. Sager credible.

27. Security University also presented certificates from the Committee on National Security Systems (“CNSS”) and NSA Security (SU Ex. 10) supporting Security University’s contention that its course work met the requirements for the information security fields Security University teaches. (Transcript, pgs. 41-42).

28. There have been no complaints by students to SCHEV that Security University had not provided training necessary to meet the standards of training in the field of study the student had attended Security University for. (Tr., pg. 104). The record supports and the hearing officer finds that Security University has met its burden that it offers courses of study that conform to state, federal, trade, or manufacturing standards of training for the occupational fields in which Security University was chartered to provide.

VIOLATION #4: Course Catalog Contains False, Inaccurate or Misleading Information.

8 VAC 40-31-160(K)(2): “All recruitment personnel must provide prospective students with current and accurate information on the school through the use of written and electronic materials. No school shall knowingly make any statement or representation that is false, inaccurate or misleading regarding the school.”

29. The 2014 Audit stated that Security University was in violation of 8 VAC 40-31-160(K)(2). SCHEV based the allegation of noncompliance in that Security University uses in its brochure (SU Ex. 1; SCHEV Ex. 8) phrases such as: “Advance your degree with “Q/ISP IA Cybersecurity Graduate Certificate,” “Q/ISP Cybersecurity Graduate or Master Certificate;” “no classroom needed.” Additionally, SCHEV took issue with Security University’s reference to a 98% pass rate and that Security University bills itself as a legitimate provider of CISSP training. SCHEV also determined that Security University is in violation of the regulations by including in its Student Handbook the use of the term “credit;” and in its Staff Handbook a reference to a “Credit Transfer Program.” SCHEV asserts the uses of such language are examples of misrepresentations made by Security University. (Tr.pg.213; SCHEV Exhibits 1 and 8). (Tr. 214).

30. SCHEV challenged this terminology because Security University is a vocational institution and not a degree conferring institution; consequently, SCHEV concluded the use of this term could be misleading to prospective students. The hearing officer finds however that Security University does provide students with “certificates” and the fact that the word “Certificate” is included in the advertisement is distinguishable from offering a degree and therefore does not appear to have been a “knowing” intent to misrepresent what Security University offers; i.e. a certification not a degree.(It is noted that the word “degree” is included in the referenced regulation; however, as stated on the record, Security University was not establish as a “degree” conferring institution and has not conferred any degrees but does provide its students with a certificate). There is no finding of a violation with regard to Security University representatives or in its documents that it knowingly made a statement or representation that is false, inaccurate or misleading regarding the school.

31. The term “no classroom needed” was challenged by SCHEV because it implies online courses of study. (Tr., pg. 213; SU Ex. 1; SCHEV Ex. 8). This language inserted by Security University

was a part of an icon in one of Security University's brochure (SU Ex. 1; SCHEV Ex. 78 as an advertisement to highlight that Security University's educational resources and quizzes would be available to students on furnished iPads (Tr., pgs. 130).

32. Ms. Rosa-Casanova provided credible testimony at the hearing that she did not believe the phrase "no classroom needed" was an attempt to knowingly mislead a student, but was inserted inadvertently. (Transcript pg. 275).

33. There was no evidence that any student had been misled into thinking they did not have to appear in a classroom and there have been no complaints about Security University to SCHEV by a student that they were misled about classroom attendance. (Transcript, pgs. 18, 26, 131). Ms. Schneider testified that the brochure in question emphasized "hands-on-training" and refers to "instructor led classes" (Transcript, pgs. 130-132, Ex. 1). In any event, Security University has since removed the language "no classroom needed" from its brochure. (Transcript, pg. 131). The hearing officer finds based on the evidence that the phrase "no classroom needed" was not an attempt to mislead prospective students into believing they did not have to physically participate in a classroom setting to take courses at Security University.

34. Security University also contained in its brochure that it had a 98% pass rate for student taking courses at Security University, preparing to take exams for certification in one of the cybersecurity/information security fields of study. (SU Ex. 1; SCHEV Ex. 8). This assertion by Security University was challenged by SCHEV as misleading. Although SCHEV challenged this assertion by Security University, Ms. Rosa-Casanova testified credibly that she did not recall requesting documentation to verify the 98% rate claim. (Transcript pgs. 275-276).

35. Mr. Brad Boute, a consultant to Security University, provided credible testimony that data collected from three (3) exams that Security University conducted, confirmed the 98% passage rate

(Tr. pgs. 73-74). Mr. Boute was retained by Security University to assist with the accreditation issue before the ACCET.

36. Ms. Schneider testified at the hearing that Security University has data to support the passing rate for its students (Transcript, pgs. 72-74; Ex. 130. Ms. Schneider also testified that one of the exams from which Security University obtains data about their passing an exam requires the student to self-report whether they passed the exam. This exam had data from 83 of 90 students who took a test, but all of them ultimately passed the exam.(Transcript, pg. 72-74). Accordingly, there was sufficient evidence that the claim of a 98% passing rate as asserted by Security University is supportable and the hearing officer so finds.

37. The 2014 Audit also questioned Security University's use of the words "graduate certificate," and "master certificate," because Security University is not a degree conferring institution (Transcript, pgs. 273-274). Further, based on the record, Security University offers "certificates" not "degrees."

38. Security University introduced information at the hearing about other institutions that use these terms in connection with a student obtaining a "certificate," rather than a degree. including the University of Richmond, (SU Ex. 15), Villanova University, the University of Virginia (SU Ex. 25) and the IBM Corporation. (Transcript, pgs. 115-118, 212); SU Ex. 15, 25).

39. Security University is not a degree conferring institution in the manner of providing college type credits leading to a baccalaureate degree, it is a vocational institution. However, even though the organizations listed, by Security University to support its use of these terms are different from Security University, they do offer non-degree certifications. The hearing officer finds the institutions that Security University has referred to are appropriate examples of institutions providing postsecondary certificates similar to that which Security University provides its students.

40. Whereas the use of the terminology “advance your degree” for example could lead a prospective student in to believing he/she would receive a baccalaureate degree, there have been no complaints from students who took a course from Security University thinking they would have college type credits by obtaining a certificate in the cybersecurity/information security fields at Security University. Furthermore, there does not appear to be any regulations preventing the use of the terminology so long as what is offered is clearly explained; accordingly there was no evidence that Security University is in violation of 8VAC 40-31(K)(2).

41. As a related issue to the use of the terms “graduate certificate” and “master’s certificate,” the 2014 Audit questioned Security University’s use of the term “credit” and “Credit Transfer Program.” (SCHEV EX. 9, pgs. 13, 31-34; SCHEV Ex. 10; Tr. Pg. 219). And there is no evidence that 8VAC 40-31-160(k)(2) prevents Security University from using the term even though it is not a degree conferring institution. (Transcript, pg. 280). With regard to the “Credit Transfer Program,” Security University has a Memorandum of Understanding with Capitol College that allows courses taken by students at Security University to be transferred. (Tr. pg. 219). Even though a violation of the regulation is not found, the use of the term “credit” or Credit Transfer Program need to be clearly described by Security University to reflect what it actually offers.

42. Security University’s Catalog, Brochure and Student Handbook contain references to programs created by Security University with similar names to other programs and certifications in the information-cyber security industry. (Tr. Pgs. 220-221; SCHEV Ex.. 8,9, and 11; Security University Ex. 2 and 3). Security University has differentiated these terms by adding the word “Qualified.” There have been no complaints filed by a student attending Security University courses that they were confused with the certifications they would be receiving as a result of training conducted by Security University (Tr. Pg. 65, 99, 104, and 107).

43. The 2014 Audit challenges Security University's listing of itself as a provider of the CISSP training and has used the trademarked name "CISSP" in its brochures and by doing so, has provided student with misleading information that Security University has a formal relationship with CISSP. (SU Ex. 7; SCHEV Ex. 7). Security University does use "CISSP" in its advertising, materials, but does so to identify Security University with the services Security University provides directed at preparing students for taking the CISSP exam (SU. Ex. 11). Also, there was no citing to a provision of the Virginia Administrative Code that would require a formal relationship between Security University and CISSP. There have been no complainants by a student that they were misled about this representation and the hearing officer does not find a violation.

VIOLATION #5: Institution Does Not Maintain Student Records In Accordance With Virginia Regulation

8 VAC 40-31-160(E) (2)(4): "The postsecondary school shall maintain records on all enrolled students. These records shall include: A transcript of the student's academic or course work at the school, which shall be retained permanently in either hard copy forms or in an electronic database with backup."

44. The 2014 Audit Report also found a violation with regard to the manner in which Security University maintains student records and transcripts and that Security University does not permanently maintain these records and therefore, Security University is noncompliant with 8 VAC 40-31-160 (E)(2)(4). Security University disputed this allegation, stating that it has maintained student records permanently since 1999 (Transcript, pgs. 109-110). However, Security University did not provide documentation to support its claim.

45. During the 2014 audit, SCHEV requested that copies of student transcripts be available with the intent that SCHEV would have the opportunity to randomly select the student transcripts it wanted to review; however, Security did not provide any transcripts. (Tr. 222-226). Instead of transcripts, student invoices were offered to SCHEV; at the hearing, Security University produced three

student transcripts (SU Ex. 12); however, this offer was not in accordance with the request of SCHEV to have the ability to randomly select student transcripts. Security University offered on the record to provide all transcripts, but that does not change the finding of SCHEV based on the 2014 Audit. Accordingly, Security University has not met its burden of maintaining student records in accordance with Virginia Administrative Code.

VIOLATION #6: Institution Advertises Programs That Do Not Meet Standards For Quality, Content and Length.

8 VAC 40-31-150 (B); “The course program, curriculum and instruction must be of quality, content and length to adequately achieve the stated objective.”

46. The 2014 Audit report alleges that Security University has violated 8 VAC 40-31-150(B) by advertising in its brochure (SU Ex. 1; SCHEV Ex. 8) that students could take an “unlimited” number of courses for a fixed price discount for 12 and 24 month periods for \$11,000. (Tr. pgs. 143-146; SCHEV. Ex. 1). Most classes offered by Security University are generally priced at \$3,000 (Tr., pg.143-146). The SCHEV concluded this type of advertisement for programs fails to meet the standards for quality, content and length as required by the regulations. However, Security University removed the term “unlimited” and instead revised its marketing language to allow for up to 23 classes for a fixed period. (Transcript, pgs. 143-145, 148-149). SCHEV’s concern with the language “unlimited” was that Security University could mislead individual students; however, only organizations have taken advantage of this offering, including the Marines, AT&T and a nuclear plant. (Transcript, pgs. 143-148, 259, 286).

47. Security University defended the practice, but based on SCHEV’s concerns, the phrase “unlimited” was removed by Security University and replaced with stating students could take up to twenty-three (23) classes for a fixed period. (Tr., pgs. 143-145. 148-149).

VIOLATION #7: Institution is Intentionally Ambiguous About Its Non-Degree Status.

The relevant regulation here is 8 VAC 40-31-10 (Definitions): “University” means any institution offering programs leading to degrees or degree credit beyond the baccalaureate level.”

48. SCHEV contends that notwithstanding it allowing Security University to use the word “University” in its name, the use of the word will confuse student into believing they would receive a baccalaureate level degree by attending Security University. Furthermore, the use of the word “University” in combination with other terms such as “credit” was misleading. SCHEV however, did allow and has continued to allow Security University to use the word “University” in its name and there have been no complainants from a student as to the type of institution that Security University is and that it does not offer college or baccalaureate type degrees (Tr. Pg.16, 26, 65, 107).

49. The 2014 Audit concluded Security University’s use of the word “University” was misleading since it does not confer degrees. However, SCHEV admitted it granted Security University the right to use the word “University” in its name when Security University applied for its Certificate to Operate. The problem as concluded by SCHEV was that the word “University” in conjunction with the use of the words “graduate,” “masters,” and “credit,” would mislead student in to thinking they would be receiving a college type credit by taking one of Security University’s courses. Two former student of Security University testified that they were not confused by thinking they would be receiving credits towards a degree (Tr., pg. 63). Accordingly, it would be improper to now penalize Security University for using the word “university” in its name when prior authorization was given. (Tr., pgs. 292-293).

50. The hearing officer agrees with SCHEV that it is to be afforded deference with regard to its interpretation of its own regulations; however, the facts as set forth on the record must also be considered and in this regard, it was not a matter of how the regulations were interpreted, because there was no evidence that Security University purposely decided to interpret the regulations in an

inconsistent manner to get around what was required. Security University appears to have not taken the regulation into consideration when it, for example, it prepared its brochure and other documents.

III. ISSUE:

Whether Security University has committed violations of the regulations administered by SCHEV to warrant a revocation of its' Certificate to Operate in Virginia.

IV. CONCLUSION:

Pursuant to Va. Code §2.2-4020(C) Security University had the burden of proof to establish by a preponderance of the evidence that no violations of the regulations listed herein above occurred. As stated herein, there were what appeared to be violations and it can be concluded that Security University has not fully complied with the specific requirements of the regulations and has not done so even with SCHEV providing appropriate guidance since at least 2011. However, it is significant to note that there were no actual violations, but the possibility of a violation due to the manner in which Security University has advertised itself. It is also clear that the violations are based on if' type of questions that a student could be misled by Security University's advertisements and information it provided to student. Yet, even with no actual harm to a student due to a misrepresentation having occurred, it would inappropriate and inconsistent with SCHEV's responsibility to protect students, but have to wait for an actual violation before taking appropriate action.

Based on the evidence at the Hearing on December 10, 2014 and the documents submitted by the parties and admitted as part of the record, Security University has clearly not developed systems of records that fully comply with the requirements of SCHEV and the cited regulations that formed the basis of SCHEV's recommendation that Security University's certificate to continue providing educational services should be revoked. It is clear that Security University needs substantial assistance to make Security University fully in compliance with all Virginia Administrative Code requirements.

Significant to note however, is that even if it were concluded that Security University may have failed to comply with the requirements as stated in the March 14, 2014 audit, the hearing officer found no basis to conclude the failure to comply was committed “Knowingly” but rather appears to have been based on a failure to take seriously the staff recommendations as specified in not only the 2014 audit, but also, the 2011 audit and the 2012 follow-up audit. The record reflects that although Ms. Schneider has the technical capability to offer the very sophisticated courses that Security University provides, it does not appear she either has the time or experience in handling both the technical aspects of what Security University offers as well as handling the day-to-day the administrative compliance matters. Such is true of many small business who, lacking in staff , find it difficult to understand compliance issues and not being able to implement what is required.

It is extremely significant to note that Security University has been operating for 14 years and certified to do business through SCHEV for at least nine (9) years, with over 23,000 students participating in one or more of its 5 day courses; yet, there have been no complaints from any of the 23,000 students about being misled by refund policy; whether they were going to receive a degree or college type credit that would lead to a degree; or, whether the courses they took at Security University would in fact help them to sit for examination to obtain certain certifications.

SCHEV makes a strong argument that the various materials that Security University presents to the public can be misleading, but here, the type of students that attend Security University classes, ages from 35 to 55 are distinguishable from students for example just getting out of high school and wanting to advance in the security field. Young high school and even college age students with no or limited working experience could be misled by improper language in advertising material; however, students with a certain level of maturity, such as the type of students Security University attracts, are not as likely to be confused by wording in an advertising brochure. Security University’s courses are not aimed at

those young students, but rather individual who have had a degree of work experiences and training and presumably would understand the need to question confusing or misleading material. The fact that Security University's publicly available information either in written form or on the internet, have not led to complaints from students seems to negate the allegations that Security University does not conduct its business as represented.

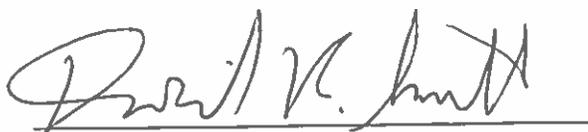
Security University had the burden of proof in this matter that it did not violate the applicable regulations as cited above. Whereas it can be concluded that Security has failed to be in fully in compliance with many of the regulations listed as violations, again the record does not reflect an intentional disregard for compliance or knowingly conducting itself in a manner to violate the regulations. Even though there were violations, the issue is whether such would warrant the most severe penalty that SCHEV could impose, being a revocation of its certificate to operate in Virginia as a vocational institution. The hearing officer concludes that the recommendation to revoke Security University's certificate to operate is not warranted and based on the facts as set forth herein would be overreaching. As stated above, it would be inconsistent with SCHEV's responsibility to have to wait until a student was harmed to take appropriate action; the question is what action with regard to Security University would be appropriate under the circumstances here.

Therefore, the recommendation to revoke a certificate to operate is the most stringent of punishments that SCHEV could suggest, and based on the facts herein with regard to Security University are not warranted. Even so, Security University has had numerous opportunities to correct its manner of doing business in order to be in compliance with the requirements of SCHEV, but as stated above, among other things, Security University appears to lack an understanding as to how to make Security University operate in accordance with the regulations. In any event, the hearing office does not believe the record supports revocation as a penalty, and therefore concludes that Security University has

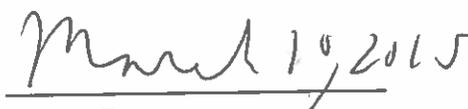
not committed violations of the regulations administered by SCHEV to warrant a revocation of its Certificate to Operate in Virginia.

VI. RECOMMENDATION

It is the recommendation of the hearing officer that Security University's Certificate to Operate not be revoked, but a lesser penalty imposed. In this regard, Security University must revise its language concerning its refund policy as stated in its Course Catalogue and Staff Handbook to be consistent with the language in its Student Handbook and the requirements of SCHEV; Security University has removed the language "no classroom needed" from its advertising material and needs to continue doing so; Security University needs to revisit the manner in which it records pass/fail statistics to be based on actual reports from students through surveys or documentation from exam sponsors; Security University should review its use of the words "graduate" "masters" and "credits" to make sure these words used in connection with "Security University" do not confuse future students in to believing they will receive a college/baccalaureate type credits. Security University needs to comply with the requirement of SCHEV and consult with SCHEV about revising its brochures, advertising material and administrative documents and policies. Lastly, recognizing that Security University can be considered a small business, this case has highlighted the need to for it to have experienced compliance personnel available to ensure it stays in compliance and avoid future audits that would suggest a revocation of Security University's Certificate to Operate.



David R. Smith
Hearing officer



Date



COMMONWEALTH of VIRGINIA

Department of Veterans Services
State Approving Agency for
Veterans Education and Training

Annie Walker
Director

Telephone: (804) 225-2083
Fax: (804) 786-0809
annie.walker@dvs.virginia.gov

August 2, 2013

Mr. James Quesenberry
Education Liaison Representative
Veterans Affairs Regional Office
116 N. Jefferson Street
Roanoke, VA 24016

NOTICE OF WITHDRAWAL OF APPROVAL Certification Tests

Institution: Security University
510 Spring St., Suite B
Herndon, VA 20170

Facility Code : 4-6-0050-46

Dear Mr. Quesenberry:

This is to advise that the approval of the above named organization is hereby withdrawn to provide certification tests to veterans and other eligible persons based on the withdrawal of the school's approval due to the below justification:

The school certifying official submitted erroneous enrollment certifications which resulted in the inflation of GI Bill payouts so veterans could receive more entitlements than they would normally be entitled to receive. This pattern of willful inaccuracy was established by interviewing one of the veterans enrolled at Security University under the VRAP program. Mr. David Sipp (VRAP recipient) was interviewed by Mr. McClellan, SAA Senior Regional Manager and Mr. Mark Brenton, Supervisory ELR. Mr. Sipp claims Security University knowingly submitted enrollment certificates for periods that exceeded his actual enrollment periods in order for him to be able to cover the entire costs of the program. This is substantiated by Mr. David Sipp's email (page 2 & 3) sent to Mr. McClellan on July 22, 2013 and other veterans (VRAP) enrollment certifications submitted by Ms. Sondra Schneider, CEO and Founder of Security University as identified in the chart below:

| Name | CSS# | Ch. | Cert Date | Cert ID | Begin Date(s) | End Date | Clock Hrs | Estimated Certified Hours | Program Hours Approved |
|-------------------|------|------|-----------|----------|---------------|----------|-----------|---------------------------|------------------------|
| Cook, Gary | 0609 | VRAP | 06/23/13 | 19139405 | 06/01/13 | 06/30/13 | 40 | 480 | 200 |
| | | | | | 07/01/13 | 07/31/13 | 40 | | |
| | | | | | 08/01/13 | 08/31/13 | 40 | | |
| Espinosa, Eric | 0121 | VRAP | 06/23/13 | 19139403 | 07/01/13 | 07/31/13 | 40 | 320 | 205 |
| | | | | | 08/01/13 | 08/31/13 | 40 | | |
| Picciotti, Philip | 4780 | VRAP | 06/23/13 | 19139404 | 07/01/13 | 07/31/13 | 40 | 480 | 200 |
| Sipp, David | 1725 | VRAP | 12/20/12 | 16989218 | 05/01/13 | 07/31/13 | 40 | 960 | 200 |
| | | | | | 11/15/12 | 04/30/13 | 40 | | |
| Simmons, Kevin | 5066 | VRAP | 06/23/13 | 19139407 | 06/01/13 | 06/30/13 | 40 | 520 | 200 |
| | | | | | 07/01/13 | 07/31/13 | 40 | | |
| | | | | | 08/01/13 | 08/31/13 | 40 | | |

AN EQUAL OPPORTUNITY EMPLOYER
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www.virginiaforveterans.com

Mr. James Quesenberry
Education Liaison Representative
Page 2

From: David Sipp [mailto:dcsipp@gmail.com]
Sent: Monday, July 22, 2013 8:02 AM
To: McClellan, Ira (DVS)
Subject: Statement of Events

Dear Mr. McClellan,

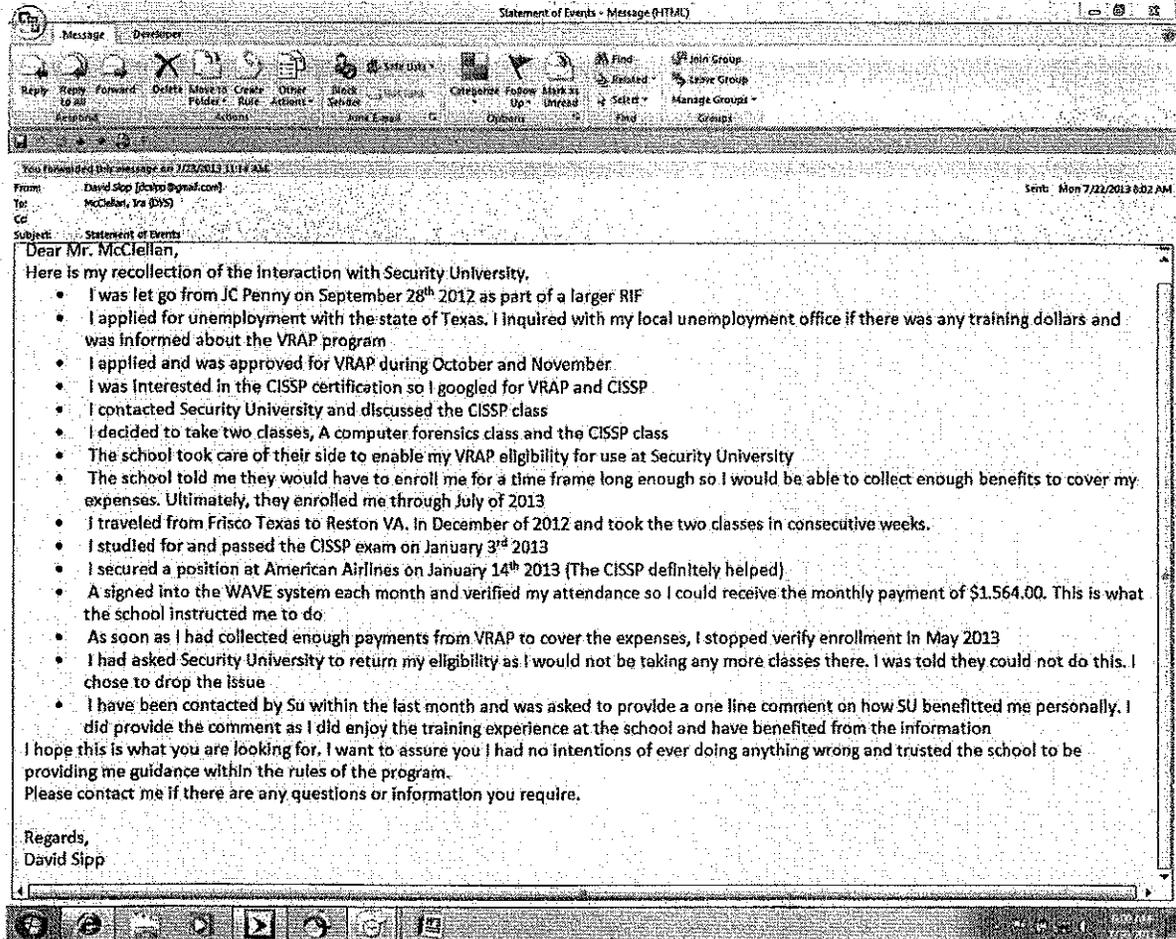
Here is my recollection of the interaction with Security University.

- I was let go from JC Penny on September 28th 2012 as part of a larger RIF
- I applied for unemployment with the state of Texas. I inquired with my local unemployment office if there was any training dollars and was informed about the VRAP program
- I applied and was approved for VRAP during October and November
- I was interested in the CISSP certification so I googled for VRAP and CISSP
- I contacted Security University and discussed the CISSP class
- I decided to take two classes, A computer forensics class and the CISSP class
- The school took care of their side to enable my VRAP eligibility for use at Security University
- The school told me they would have to enroll me for a time frame long enough so I would be able to collect enough benefits to cover my expenses. Ultimately, they enrolled me through July of 2013
- I traveled from Frisco Texas to Reston VA. In December of 2012 and took the two classes in consecutive weeks.
- I studied for and passed the CISSP exam on January 3rd 2013
- I secured a position at American Airlines on January 14th 2013 (The CISSP definitely helped)
- A signed into the WAVE system each month and verified my attendance so I could receive the monthly payment of \$1,564.00. This is what the school instructed me to do
- As soon as I had collected enough payments from VRAP to cover the expenses, I stopped verify enrollment in May 2013
- I had asked Security University to return my eligibility as I would not be taking any more classes there. I was told they could not do this. I chose to drop the issue
- I have been contacted by Su within the last month and was asked to provide a one line comment on how SU benefitted me personally. I did provide the comment as I did enjoy the training experience at the school and have benefited from the information

I hope this is what you are looking for. I want to assure you I had no intentions of ever doing anything wrong and trusted the school to be providing me guidance within the rules of the program. Please contact me if there are any questions or information you require.

Regards,
David Sipp

A copy of the original email is on page 3



What the school must do:

The school must immediately discontinue all advertisement that indicates that the school is approved for veterans training.

The school *may not* reapply for approval to provide training to veterans and other eligible persons. Any application request received in our office will be returned to the school without any action.

This decision is final and there is not an appeal process.

Mr. James Quesenberry
Education Liaison Representative
Page 4

The authority for this action is Chapter 36 of Title 38, United States Code 3679, which states (among other provisions):

(a) The appropriate State approving agency, after approving any course:

(2) Will immediately disapprove the course, if any of the requirements for approval are not being met and the deficiency cannot be corrected within a period of 60 days.

Reference: CFR21.4252 (h) (1) Courses precluded; erroneous, deceptive, or misleading practices.

(h) Erroneous, deceptive, or misleading practices. For the purposes of this paragraph, "educational institution" includes an organization or entity offering licensing or certification tests.

(1) If an educational institution uses advertising, sales, enrollment practices, or candidate handbooks that are erroneous, deceptive, or misleading by actual statement, omission, or intimation, VA will not approve.

Effective Date of Withdrawal: July 3, 2013

Sincerely,



Annie Walker
Director

Cc: Ms. Sondra Schneider, CEO Security University

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| Certified Fee | 3.10 |
| Return Receipt Fee (Endorsement Required) | 2.55 |
| Restricted Delivery Fee (Endorsement Required) | |
| Total Postage & Fees | \$ 8.31 |

Postmark
Here

Sent to: Sandra Schneider
 Street, Apt. No. or PO Box No.: 510 Spring St Ste B
 City, State, ZIP+4: Herndon VA 20170
 PS Form 3811 August 2004 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

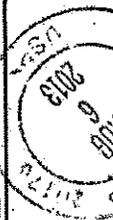
- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Sandra Schneider
 Security University
 510 Spring Street, Suite B
 Herndon, VA 20170

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressed
 B. Received by (Printed Name) Chris Pugh
 C. Date of Delivery
 D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:



3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.
 4. Restricted Delivery? (Extra Fee) Yes

2. Article Number 7012 3050 0001 4340 3492
 (Transfer from service label)
 PS Form 3811, February 2004 Domestic Return Receipt 142595-02-M-1-01n 1

VA Form 22-1998

Name: SECURITY UNIVERSITY

Address 1: 12021 SUNSET HILLS

Address 2: 4th FLOOR

Address 3:

City/State/Zip: RESTON, VA 20190

County:

Foreign Postal Code:

State/Province:

Country: USA

Mil. Post Office:

Mil. Address:

Phone: Type Number
Daytime (203) 357-7744

E-Mail: s0ndra@securityuniversity.net

Facility Code: 46005046

Status: Withdrawn on **Revision Date:**
07/03/2013

App Law: 3 - Approved **Branch** N **35% Waiver:** N
For All **Location:**

Advanced N **VA Checks** N **IHL Exempt:** N
Payments: To:

Catalog: Catalog Years

Full Time **Full Time** **Graduate:**
Undergraduate: **Modifier:**

Enrollment **Enrollment** **Course**
Limit: **Limit** **Limit:**
Indicator:

Independent N **Cooperative:** N **Practical** N
Study/ **Distance** **Training :**
Learning :

Remedial N **Accreditation:** N **TV:** N
Training :

Air Agency Cert. **Title VI: Compliance** **VA-ONCE:** N



QUALITY REVIEW CHECKLIST

Prior to submitting the completed approval letter to the ELR and school officials you should,

- Check the date of the letter*
- Check for correct name and address of institution*
- Check to ensure the activity action of the letter is correct (Revised Approval, New Approval, etc)*
- Check to see if the facility code matches*
- Check the salutation line*
- Check to ensure that all the programs on the approval letter are listed in the catalog*
- Compare your approval letter against the current WEAMS for corrective measures*
- Identify all changes, i.e. hour changes, names changes, new programs, different effective dates, and withdrawn programs*
- Check to ensure that you have remove all withdrawn programs from the approve program section of the letter*
- Check the reference line*
- Check the authority line*
- Check to ensure the effective date is correct*
- Check the signature line*
- Ensure that all attachments are included with the ELR and file copy of the approval letter*
- Completed Approval Action Form (attach to ELR and SAA approval package)*
- ELR- Make copy of letter with all supporting documentation including Approval Action Form*
- SAA-Make yellow copy of letter with all documentation including Approval Action Form*
- Mail original approval letter to the requesting institution*
- Approval Certificate Requested*



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
1722 N. Street, N.W., Washington, D.C. 20036
Telephone: 202-955-1113 Fax: 202-955-1118
<http://www.accet.org>

January 5, 2015

VIA FEDERAL EXPRESS AND EMAIL
(s0ndra@securityuniversity.net)

Ms. Sondra Schneider, CEO
Security University
510 Spring Street, Suite 130
Herndon, VA 20170

**Re: Accreditation Denial – Final Action
ACCET ID # 1295**

Dear Ms. Schneider:

This letter is written to advise you that the denial of accreditation by the Accrediting Commission of the Accrediting Council for Continuing Education and Training (ACCET) to Security University was affirmed by the ACCET appeals panel at the December 12, 2014 hearing. The Accrediting Commission denied accreditation to Security University in its letter dated August 21, 2014, citing twelve (12) findings of non-compliance, along with specifying an opportunity to appeal the decision. The institution submitted its request to appeal and subsequently provided its appeals brief and exhibits on November 21, 2014. Upon review of the institution's brief and exhibits, the panel affirmed the Commission's findings, as referenced in the enclosed decision of the appeals panel. Therefore, the decision to deny accreditation to the institution is a final action. It is noted for the record that the Commission acknowledged the appeals panel's decision to deny accreditation to Security University after its consideration of the written record, including the appeals brief and exhibits.

As a closing note, the institution has the opportunity to provide a narrative to the Commission's action within 15 days of receipt of this letter. ACCET reserves the right to redact any inappropriate or inflammatory comments prior to posting the response on the website. It remains our hope that the accreditation process has served to focus the institution's resources and commitment towards strengthening its operations through the systematic and effective implementation of policies and procedures that ensure the highest level of quality and integrity.

Sincerely,

A handwritten signature in cursive script that reads "William V. Larkin".

William V. Larkin, Ed.D.
Executive Director

WVL/jss

Enclosure: Decision of the Appeals Panel

CC: Mr. Herman Bounds, Chief, Accreditation Division, USDE (aslrecordsmanager@ed.gov)
USDE Accredited School Directory (AccreditedSchoolsList@westat.com)
Ms. Sylvia Rosa Casanova, Director for Private and Out-of-State Postsecondary Educ., VA State Council of Higher Education for Virginia (sylviarosacasanova@schev.edu)



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
1722 N. Street, N.W., Washington, D.C. 20036
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<http://www.accet.org>

Security University Appeals Panel
Meeting on Friday, December 12, 2014

Security University
ACCET ID#1295

Members of the ACCET Appeals Panel:

| | |
|---|---|
| Mr. Michael Crom Consultant Past Chair, ACCET Commission Lloyd Harbor, NY | Appeals Panel Chair - Public Member |
| Ms. Nayibe Marino Chief Operating Officer American Advanced Technicians Institute Hialeah FL | Institutional Member -- Administrative |
| Ms. Linda Hanks Manager Focus HOPE Information Technologies Center Detroit, MI | Institutional Member -- Academic |

Representing Security University:

| | |
|------------------|---|
| Sondra Schneider | Founder & CEO, Security University |
| Stephen Shannon | Attorney at Law Odin, Feldman & Pittleman, P.C. Reston, VA |
| Brad Boute | Consultant |

Also present:

| | |
|--|---|
| Kenneth Ingram ACCET Legal Counsel | Whiteford Taylor Preston Washington D.C. |
| John Shaheen Associate Executive Director | Staff Facilitator to the Appeals Panel |

December 16, 2015

In re: Security University #1295

510 Spring Street
Suite 130
Herndon VA 20170

**AFFIRM DECISION
Denial of Accreditation**

On Friday, December 12, 2014, the Appeals Panel met to hear the oral presentation of Security University (SU), which began at approximately 9:00 am ET. With the permission of the Chair, SU was permitted to make an audio recording of the presentation and follow up questions. SU was also permitted to extend its oral presentation beyond the 45 minutes provided, until approximately 10:30 am, including time for a series of follow up questions from members of the Appeals Panel, legal counsel, and staff. The Appeals Panel deliberated until approximately 2:30 pm ET.

The Appeals Panel unanimously affirmed the decision, with modifications, of the ACCET Accrediting Commission, dated August 21, 2014 and addendum of September 5, 2014, to deny reaccreditation to Security University.

The Appeals Panel noted a continued lack of clarity in the record relative to the status of SU as an avocational school or a vocational school, and therefore rendered a two-part decision:

- A. As a vocational school certified by the State Council of Higher Education for Virginia (SCHEV), and determined as such by ACCET in its Commission Action Letter of April 17, 2014, the Panel affirmed that nine findings are non-compliant: 1) Standard II-A Governance; 2) Standard II-B Operational Management; 3) Standard III-B Financial Procedures; 4) Standard IV-B Program/Instructional Materials; 5) Standard IV-C Performance Measurements and Standard VIII-A Student Progress; 6) Standard IV-E Certification and Licensure; 7) Standard VII-A Recruitment; 8) Standard VII-B Enrollment; and 9) Standard VIII-E Completion and Placement. Two additional findings are partially non-compliant: 1) Standard VI-C Instructor Orientation and Training (faculty meeting minutes do not provide documentation of in-service training) and 2) Standard VIII-B Attendance (late policy is not educationally sound).

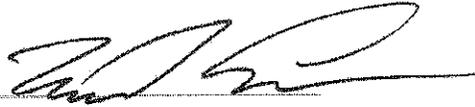
- B. If SCHEV were to reverse its decision and find that SU is an avocational school and does not require a certificate to operate, the panel affirmed that six findings are fully non-compliant: 1) Standard II-A Governance; 2) Standard II-B Operational Management; 3) Standard III-B Financial Procedures; 4) Standard IV-E Certification and Licensure; 5) Standard VII-A Recruitment; and 6) Standard VII-B Enrollment. Two additional findings are partially non-compliant: 1) Standard VI-C Instructor Orientation and Training (faculty meeting minutes do not provide documentation of in-service training) and 2) Standard VIII-B Attendance (late policy is not educationally sound).

The Appeals Panel acknowledges that the institution has initiated some corrective actions to improve its operation; however these actions were incomplete and without sufficient validation of their systematic and effective implementation prior to the Commission's August 2014 decision.

decision. Therefore, it is the unanimous decision of the members of the Appeals Panel to affirm the Commission's decision conveyed in the August 21, 2014 action letter.

APPEALS PANEL

By



Mr. Michael Crom
Chairperson

CONCURRING

Ms. Nayibe Marino

Ms. Linda Hanks

decision. Therefore, it is the unanimous decision of the members of the Appeals Panel to affirm the Commission's decision conveyed in the August 21, 2014 action letter.

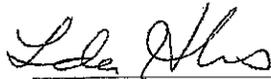
APPEALS PANEL

By _____

Mr. Michael Crom
Chairperson

CONCURRING

Ms. Nayibe Marino



Ms. Linda Hanks

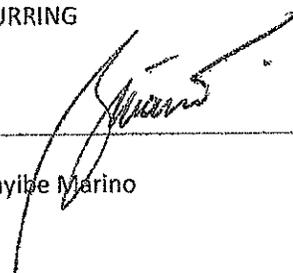
decision. Therefore, it is the unanimous decision of the members of the Appeals Panel to affirm the Commission's decision conveyed in the August 21, 2014 action letter.

APPEALS PANEL

By _____

Mr. Michael Crom
Chairperson

CONCURRING



Ms. Nayibe Marino

Ms. Linda Hanks