

# IOWA COLLEGE STUDENT AID COMMISSION

## Northcentral University Application for Postsecondary Registration Renewal May 15, 2018

***STAFF ACTION: Approve Northcentral University's request for registration renewal in Iowa for a two-year term that begins retroactively on January 19, 2018 and ends on January 19, 2020.***

### **Registration Purpose**

Iowa Code Sections 261B.2 (definitions) and 261B.3 require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this state or if the school otherwise has a presence in this state. Presence means a location in Iowa at which a student participates in any structured activity related to a school's distance education course of instruction. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations. Staff required Northcentral University (the University) to apply for registration to offer distance education programs to Iowa residents because the University employs faculty in its distance education programs who work remotely for the University from an Iowa location(s); and the University offers a distance education program(s) that requires a structured field experience that an Iowa resident student may participate in at an Iowa location.

### **Institutional Information**

Northcentral University is a for-profit postsecondary educational institution that offers only distance education programs and whose administrative headquarters are located at 2488 Historic Decatur Road, Suite 100, San Diego, California 92106. The University maintains a Service Center at 8667 East Hartford Drive, Scottsdale, Arizona 85255. The Chief Executive Officer of the school is President George A. Burnett, at the San Diego, California address. The University is not registered with the Iowa Secretary of State as a corporation conducting business in the state of Iowa, and the Commission cannot require that it do so.

*Ownership:* In 2008, Northcentral University was acquired by NCU Holdings, LLC. Northcentral University is a wholly-owned subsidiary of Northcentral Education International, Inc., which is a wholly-owned subsidiary of Northcentral University, Inc. Northcentral University, Inc. is a wholly-owned subsidiary of Innova Management Group, Inc. (Innova), and Innova is a wholly-owned subsidiary of NCU Holdings, LLC. NCU Holdings, LLC is primarily owned by Rockbridge Growth Equity, LLC, and Falcon Investments, LLC.

The University's Board of Trustees is composed of the following individuals:

- Jerry Israel, Ph.D., Chair: Dr. Israel is the former President of the University of Indianapolis and Morningside College in Sioux City, Iowa. He has held other administrative posts in higher education including Chair of the History Department at Illinois Wesleyan University, and Academic Dean at Illinois Wesleyan and Simpson College. He also served for over a decade as a peer evaluator for the Higher Learning Commission.

- Harold Greenberg, BS in Industrial Management, Secretary/Treasurer: Mr. Greenberg is Chair of the Royce Companies and PROTO-II/0xC8 Walls Systems, a company that markets and supports the use of licenses for proprietary masonry systems throughout the U.S. Previously, Mr. Greenberg worked for General Electric, the Burroughs Corporation, and as a business owner in areas that included homebuilding and real estate development. In 2004, Mr. Greenberg received the Distinguished Alumni Award from Purdue University's Krannert School of Management.
- \*Brian Hermelin, MBA, member: Mr. Hermelin is the Founding Partner of Rockbridge Growth Equity, LLC, an owner of the University's parent company, NCU Holdings, LLC. He is also a founding partner of Detroit Venture Partners, an early stage venture capital firm. Presently, he is a member of the Boards of Directors of ePrize LLC, Telemus Capital Partners, LLC, Protect American, Connect America, MyInsurance Expert.com, Purchasing Power, Rock Gaming, and Veritix.
- James Horton, Ph.D., member: Dr. Horton is the former President of North Lake College in Irving, Texas, and the former Chancellor of the San Jacinto College District in Houston, Texas. He served as Vice Chancellor and later CEO of the Higher Colleges of Technology in the United Arab Emirates, and retired as the President of Yavapai College in Prescott, Arizona.
- \*Steve Linden, BBA, member: Mr. Linden is Vice President of Rockbridge Growth Equity, LLC, one of the owners of the University's parent company, NCU Holdings, LLC. Previously, he was an Associate at Long Point Capital, a private equity fund, and served on the board of directors for several portfolio companies of Long Point.
- Curtis McCray, Ph.D., member: In 2005, Mr. McCray retired from a 40-year career in higher education academia and administration, serving as a professor of English, Dean of Arts and Sciences, Vice President, Provost. He was the President of the University of North Florida, California State University-Long Beach, Millikin University, and National Louis University. Dr. McCray also served three different regional accrediting agencies as a visiting team chair.
- \*Kevin Prokop, MBA, member: Mr. Prokop is a Founding Partner of Rockbridge Growth Equity, LLC, one of the owners of the University's parent company, NCU Holdings, LLC. Formerly, he was Managing Director at Questor Partners Fund and Engagement Manager with McKinsey & Company. He has served on several boards of private and publicly-traded companies, including One Reverse Mortgage, Protect America, AccountNow, One on One Marketing, Connect America, and Purchasing Power.
- Karen Rizk, BS in Finance, Vice Chair: Ms. Rizk is the retired Vice President of National Bank of Arizona. Early in her career, she taught elementary school. She has served since 1986 on the Yavapai College Foundation Board and was the Foundation Board's President for two years. In 1996, she was appointed to the Arizona State Board of Directors for Community Colleges and was the Board's Chair for nearly three years.
- Barbara Ross-Lee, D.O., member: Dr. Ross-Lee established her own family medical practice in Detroit, and then began teaching at the college level and in medical schools. She served as professor of family medicine at Michigan State University and was named Associate Dean for Health Policy in 1991. In 1993, she was appointed Dean of the Medical School at Ohio University. Currently, she oversees New York College of Osteopathic Medicine at the New York Institute of Technology. She is the Executive Director of the National Osteopathic Medical Association.
- \*John Schnabel, MBA, member: Mr. Schnabel is a Partner at Falcon Investment Advisors, one of the owners of the University's parent company, NCU Holdings, LLC. Previously, he

was a partner at Canterbury Capital Partners. He has also been affiliated with Generation Partners and General Motors Investment Management Corporation.

- Tom Page, MS in Industrial Administration, member: Mr. Page is the former Chairman of the Board of the San Diego Gas and Electric Company and its holding company, Enova Corp. Before entering the utility business, Mr. Page was a construction and structural engineer and served as an officer in the United States Air Force. He is currently a member of the Board of Directors of the San Diego State University Fowler School of Business and the Council Scripps Institution of Oceanography at the University of California at San Diego.
- \*Irene Wang, BSBA, member: Ms. Wang is currently a Vice President at Falcon Investment Advisors, one of the owners of the University's parent company, NCU Holdings, LLC. Previously, Ms. Wang worked in the Investment Banking Health Care Group at Citigroup Global Markets. She currently serves on the Board of Directors at companies including Northstar Group Services, Abuv Media, Rapid Advance, and Gas Station TV.
- Bill Whittington, JD, member: Mr. Whittington has been employed with the law firm of Boyle, Pecharich, Cline, Whittington & Stallings since 1981. He is a frequent lecturer at statewide conferences and a published author. His areas of emphasis in law practice include government and private commercial transactions, real estate, employment and contract issues, labor issues, and estate planning.
- George A. Burnett, MBA, ex-officio member: Mr. Burnet is CEO and President of Northcentral University. He also serves on the Board of Directors of the Penn Foster Education Group. Previously, he was President of Alta Colleges. He was also Chairman of R.H. Donnelley, Inc., and President, CEO and Director of Dex Media, Inc.

\*Note: While there are five current members of the University's Board of Trustees who represent the owners of the University's parent corporation, a June 2015 Team Report of the University's regional accrediting agency, the Western Association of Schools and Colleges (WASC) states (page 27), "The bylaws of the board of trustees mandate that Board membership consist of a majority of independent trustees, specifically eight independent trustees and five trustees representing the corporation. The five trustees representing the investors do not participate in the discussions (and abstain from voting) regarding investors' management fees and other matters that post conflicts of interest. The Chair is drawn from the independent members as are chairs of the board's committees."

*Physical Facilities:* Not applicable for a distance education program provider.

*Accreditation:* Northcentral University is accredited by the Western Association of Schools and Colleges, Senior College and University Commission (WASC). WASC is a regional accrediting agency that is recognized by the federal Department of Education. The full text of a 2015 WASC Team Report that is referred to throughout this evaluation report is available on the WASC website at <https://www.wscuc.org/institutions/northcentral-university>.

The University's Master of Arts in Marriage and Family Therapy Program is accredited by the Commission on Accreditation for Marriage and Family Therapy Education (COAMFTE). This accreditor is not recognized by the federal Department of Education> However, it is recognized by the Iowa Board of Behavioral Sciences as the "gold standard" for the education needed to qualify for professional licensure in Iowa as a marriage and family therapist.

*Federal Stafford Loan Cohort Default Rate (FFY 2014):* 5.6%

For comparison purposes, the FFY 2014 national average cohort default rate is 11.5%.

*Graduation Rate:* This is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion, as reported by the University to the federal Department of Education. The University has no reported graduation rate since full-time, first-time undergraduate level students constituted less than 2% of the student population in the most recently reported student cohort year. The University is primarily a graduate institution.

*Average Loan Debt Upon Graduation:* \$19,172

*Record Preservation:* Academic records for all students and graduates of Northcentral University are kept electronically via the University's Compass Database. The information documented includes the student's program information, courses and grades, the status of graduation, completion, withdrawal, and/ or dismissal. Academic transcripts generated from this system are maintained indefinitely. In case of loss, backup protocols for recovery are in place. Academic transcripts are retained indefinitely. In the event of school closure, the University will work with the California Bureau for Private Postsecondary Education to ensure that a custodian of records is established at the time of the closure. The designated custodian of records will be responsible for permanently preserving and managing the University's student transcript records.

*Transcript Requests:* Any current or former student may request a transcript by contacting:

Office of the Registrar  
Northcentral University  
2488 Historic Decatur Road, Suite 100  
San Diego, CA 92106  
(928) 541-7777  
[registrar@ncu.edu](mailto:registrar@ncu.edu)  
[http://www.ncu.edu/sites/default/files/transcript\\_request.pdf](http://www.ncu.edu/sites/default/files/transcript_request.pdf)

*Instructional Methodology:* In each and every course, an individual student is paired with one faculty member, resulting in a class size of one. Faculty members function as instructors, facilitators, guides, consultants, and evaluators, facilitating learning through inquiry-based interaction and individualized feedback.

Course interaction occurs through an online proprietary learning management system called NCUOne. The University purchased Desire2Learn's BrightSpace online classroom platform and customized it to produce NCUOne, which was implemented in late 2017. NCUOne provides enhanced flexibility in delivering course content, permitting a faculty member to specifically tailor material to the way a particular student learns best. Students have a more streamlined experience with more interesting content. There are methods and tools in NCUOne for communicating, including but not limited to video, audio, email, web presentations, and social media. In addition, course material is laid out on a week-by-week basis so everything needed for the week is in one location. There is less clicking and searching necessary to locate material. NCUOne remembers where the student left off, so students do not have to hunt to find their place when they return to the online classroom.

Other student-focused features include increased mobile capabilities, the ability to track progress through a course and its content, and customizable notifications. The portal houses a large volume of information, making University services, financial aid information, and other resources easier to access.

All degree programs include a set of fundamental courses and a set of related specialization courses allowing the student to select coursework closely associated with their educational and career goals. Students complete a degree plan, guided by faculty and supported by technology, and electronic resources and databases.

*Student Learning Resources:* The University's Library <https://library.ncu.edu/> is available online to students 24 hours per day, seven days per week. The Library offers academic research resources in a variety of formats through 124 searchable databases <https://ncu.libguides.com/az.php>. Seventy-seven of these contain full-text articles and abstracts of leading publications in fields relevant to all degree programs. Ebooks are available through 12 databases <https://ncu.libguides.com/az.php?t=21594> including Ebook Central and EBSCOhost. Academically related videos are available through another 15 databases including Academic Video Online: Premium, and Films on Demand. University research Librarians have also created over 100 research Guides <https://ncu.libguides.com/?b=g&d=a> on various topics. The University identifies the specific Library staff person responsible for the creation of each Guide and makes contact information for that Librarian available to students who have questions or need assistance. Students may also be able to access, free of charge, the full text of publications that are unavailable through the University Library through InterLibrary Loan (ILL) [https://ncu.libguides.com/interlibrary\\_loan](https://ncu.libguides.com/interlibrary_loan).

Students who need research assistance may contact Ask-A-Librarian from the Library main page via email, text, chat, or by toll-free telephone. Students may also schedule an individual research consultation with a reference Librarian. From the Library main page, students may also readily access self-help tools including tutorials on the Library's resources and services, a webpage containing 378 sortable answers to common questions about the Library and its resources <https://ncu.libanswers.com/search/>, and a sign-up page for Library workshops. The Library is staffed Monday through Thursday 8 am to 9 pm, and 8 am to 5 pm Friday through Sunday. Library hours are based on Mountain Time.

The Academic Success Center (ASC) <https://www.ncu.edu/asc-chat> is designed to help students gain knowledge and skills to communicate effectively while adhering to the American Psychological Association (APA) editorial style, the standard used for scholarly writing at Northcentral University. Students can join Resources for Writers, Research and Statistics Support Unit, and APA Guidelines communities. Grammarly allows a student to self-edit and proofread documents by providing automated instructional feedback a student can use to revise his or her work. Statistics coaches provide written and video feedback concerning a student's work and questions. They also provide recommendations regarding next steps toward developing the designated statistical competency. Writing coaches review student work within 2 days of an appointment and provide a recording in which the coach discusses the student's written communication and offers recommendations on how it might be improved. In Live Online Coaching, a student may engage with a live coach and other students who are working on the same skill. A student may also schedule a one-on-one session to work collaboratively with a live coach.

In addition to the ASC, the University maintains a Dissertation Center. The Dissertation Center is available to students to assist them in developing a high quality dissertation. The Dissertation Center provides access to style guides and a general overview of dissertation structure. There is also a section for each school of the University with specific updates and helpful information. The Writing Center offers more than 100 handouts on critical reading, prewriting, and revising for an academic audience. For students who wish to spend focused time on their writing skills, the University offers a series of undergraduate courses tailored to the NCU Writing Process

[http://learners.ncu.edu/writingprogram/writing\\_courses.aspx?menu\\_id=339](http://learners.ncu.edu/writingprogram/writing_courses.aspx?menu_id=339). All of these resources are accessible through the online student portal.

*Curriculum Evaluation and Development:* Every program at NCU conducts an annual academic program review. Annual program reviews are tactical tools used to make immediate program improvements and assess short-term goals. In addition, comprehensive five-year program reviews occur on a staggered schedule. Five-year program reviews are designed to generate data that allow the faculty and program advisory councils to assess longer-term program success and, based on those data, to implement changes in outcomes, design, content, or pedagogy whose efficacy can in turn be evaluated in annual or comprehensive program reviews. The University also uses these reviews to inform the strategic planning process. Program reviews include analyses of student achievement of program learning outcomes through student performance in courses. Certain student assignments are assessed not only by the student's faculty instructor but by other faculty specifically for the purpose of evaluating the curriculum and determining where improvements are needed in courses and faculty grading practices. During program reviews, the University also evaluates comprehensive exam performance; dissertation quality; dissertation time to completion; retention rates; graduation rates and time to graduation; faculty qualifications, professional development and workloads; course evaluations, student satisfaction surveys and alumni surveys; licensure exam scores and licensure rates; and, if relevant, program accreditation.

Detailed information about the University's on-going curriculum evaluation process is available in the 2015 WASC Team Report at <https://www.wscuc.org/institutions/northcentral-university>.

NCU courses are developed using a team approach. Below are the expected outputs of the phases of the course development process and the roles of key individuals in each step of that process. There are other roles that are involved before a course design is initiated. Since these roles fall outside of the course design process, their participation is not described below.

- Planning – The Senior Director of Curriculum is involved with strategic planning for curriculum and program development throughout the University. This individual works with the Senior Instructional Designer, the school Curriculum Director, and the faculty Subject Matter Expert to assign revisions and new course development to a course development team once new degree or degree revisions have received all required University approvals. The University Curriculum Faculty Liaison is involved at the planning stage as well, working with schools, Instructional Design Teams, and various affected internal departments to coordinate development projects. The Senior Instructional Designer coordinates curriculum development projects with the University Curriculum Faculty Liaison, and assigns an Instructional Designer to each project.

- **Analysis:** The school Curriculum Director, Curriculum Faculty, Assessment Director, and Subject Matter Expert work with the Instructional Designer to analyze current trends and industry changes that might need to be considered in the design of a course. These individuals monitor alignments of a course to program outcomes, and if necessary, recommend changes to the course description, learning outcomes, and course concepts. The Instructional Designer lends expertise in online course design and development, user experience, knowledge of University modalities, and knowledge of learning models.
- **Design:** The Curriculum Faculty, Subject Matter Expert, Instructional Designer, Editor, Instructional Design Librarian, Instructional Technologist, and Book Liaison collaborate with the course development team to design course organization, identify course resources including textbooks (if deemed necessary), additional resources, and supplemental materials, including media where applicable. The Instructional Design Librarian contributes to this process through his or her knowledge of scholarly resources available from the NCU Library and elsewhere, course-appropriate Library tutorials, citation-formatting knowledge, and copyright issues. This group creates engaging course content including introductions, examples, any applicable case studies, and crafts assignments and activities to support and assess learning outcomes. The course is edited twice during this process, using the expertise of an Editor who contributes to language and formatting, and ensures accuracy and consistency in the tone and style of the course in comparison with other courses across the University.
- **Development:** The school Curriculum Director, Instructional Designer, Curriculum Faculty, Instructional Technologist, and Course Builder develop or acquire learning materials to support the course, build the course in the University's learning management system, and subject the course to the School Dean for approval to implement.
- **Implementation:** The school Curriculum Director, Instructional Designer, and Book Liaison open the new course offering for student enrollment and inform Curriculum Faculty of its availability. Curriculum Faculty teach the course.

*Student Complaints Process:* Students are encouraged to attempt to resolve all issues with their Academic Advisor. Academic Advisors will coordinate and collaborate with required team members in pursuit of a student's required response. This procedure supports timeliness, quality, accountability, and ensures that the appropriate institutional departments and officials are involved to resolve matters in an efficient and effective manner. Additionally, it allows those closest to the problem the ability to extend the highest levels of support services.

The following are the levels at which the student should initiate and if necessary escalate a complaint <http://ncu.catalog.acalog.com/content.php?catoid=6&navoid=1070>:

- First Level: Academic Advisor/ Financial Services Advisor/ Faculty
- Second Level: Academic Liaison/ Associate Director of Student Services
- Third Level: Director of Student Services/ Senior Director of Student Services
- Fourth Level: Ombudsman or Legal Affairs (depending on the nature of the issue)
- Fifth Level: Grievance – a formal complaint about a matter which has not been resolved at other levels within the University.

Dissertation students are required to work through problems and concerns with their Committee Chair. Students are referred to the Doctoral Candidacy Resource Guide for guidance in these matters. If a student is unable to resolve an issue with the Chair regarding dissertation protocols, then the student may use the resolution methods outlined above.

Formal grievances <http://ncu.catalog.acalog.com/content.php?catoid=6&navoid=1071> are reviewed by the Provost and are considered final. A student may file a grievance through the Academic Advisor if all other steps noted above have been attempted without satisfactory resolution. The formal grievance must include the following: the complaint, all methods of resolution that have been attempted, description of events leading to the grievance, and remedy or resolution being requested. The University does not permit students to grieve the University's stated or published policies.

Students may file a complaint with the University's primary state authorizing agency, the California Bureau for Private Postsecondary Education. Students may also file a complaint with the state agency in the student's state of residence. State agency contact information is located at <http://www.ncu.edu/corporate-information/privacy-statement-and-consumer-information/student-grievance-contact-information>.

### **Distance Education Programs Offered In Iowa**

See the separate list of programs the Commission authorizes Northcentral University to offer to Iowa residents. That list includes the estimated total cost of tuition and fees for each program, including course materials. Northcentral University also discloses the total estimated cost of its programs on its website at <https://www.ncu.edu/tuition-admissions/tuition>.

**Note:** The University is not authorized by the Commission to offer the following programs to Iowans:

- Bachelor of Education
- Master of Social Work

### *Field Experiences:*

- **Master of Arts in Marriage and Family Therapy:** This program contains two field experience requirements. The first requirement is 500 hours of direct client contact, which includes conducting face-to-face therapy with individuals, couples, families, and groups. At least 250 hours of client contact must be relational. Students must also participate in an additional 100 hours of supervised client contact, of which at least 51 hours must involve in-person, one-to-one supervision with the client, student and a local approved supervisor who is in the room. The University approves local clinical supervisors based on the requirements of the student's state of residence for post-graduate supervision of marriage and family therapists in that State.
- **Doctor of Philosophy in Marriage and Family Therapy:** This program contains a practicum and nine-month internship requirement. Students are able to complete the internship and practicum requirement in their local area through a face-to-face clinical experience with therapy clients and a qualified supervisor. The Director of Clinical Field Placements and other faculty and staff work with students to arrange and secure an appropriate local site and supervisor. Students meet regularly in a synchronous, virtual environment with faculty

and other students during clinical experiences to view recorded sessions with clients and discuss clinical skills and knowledge.

### **Registration Compliance**

As required by Iowa Code Section 261B.4, Northcentral University maintains an institutional policy on refunding tuition charges for withdrawn students that meets the requirements of Iowa Code Section 714.23. The policy is disclosed to Iowa resident students in the student's Enrollment Agreement, a sample of which was provided to staff for review.

Administrative rules specifically require the school to comply with the requirements of Chapter 261.9(1) "e" through "h".

- Iowa Code Section 261.9(1)(e) requires a school to maintain and disseminate a drug and alcohol abuse policy that includes sanctions for violation of the school's policy and information about the availability of drug or alcohol counseling or rehabilitation. Iowa Code Section 261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that includes information about counseling opportunities and reporting instances of sexual abuse to school officials and law enforcement. Northcentral University complies with the requirements of Iowa Code Section 261.9(1)(e) and (f) and discloses these policies to students in the following locations on its website:
  - ✓ <http://www.ncu.edu/corporate-information/code-of-conduct-policy>
  - ✓ <http://www.ncu.edu/northcentral-global/consumer-information/alcohol-and-drug-policy>
  - ✓ <http://ncu.catalog.acalog.com/content.php?catoid=6&navoid=1172#well-being-and-safety>
- Iowa Code Section 261.9(1)(g) requires a school to maintain a policy for refunding tuition and mandatory fees to a member of the Iowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, in cases when the servicemember has been called to active national guard or federal service or duty. The University discloses this policy to its Iowa resident students in its Enrollment Agreement, a sample of which was provided to staff for review.
- Iowa Code Section 261.9(1)(h) requires a school to develop and implement a policy for employees who, in the course of their employment, attend, examine, counsel, or treat a child and who suspect the physical or sexual abuse of that child. By cross-reference from existing administrative rules for registration, this policy applies to registered distance education program providers that have compensated parties working remotely for the school from an Iowa location. The University maintains a compliant policy and discloses it on its website at <http://www.ncu.edu/corporate-information/code-of-conduct-policy>.

*Student Consumer Information:* In its registration application, Northcentral University affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. The University provides these disclosures in multiple locations on its web site, as follows:

- <https://www.ncu.edu/programs-degrees>
- <http://ncu.catalog.acalog.com/content.php?catoid=19&navoid=3340> (programs)

- <http://ncu.catalog.acalog.com/content.php?catoid=19&navoid=3341> (course descriptions)
- <http://www.ncu.edu/tuition-and-admissions/tuition>
- <http://www.ncu.edu/why-northcentral/accreditation>
- <http://ncu.catalog.acalog.com/content.php?catoid=19&navoid=3359>

Information about certificate programs that count as credit toward masters or, as applicable, doctoral programs the University offers is disclosed on each individual program page in the Catalog, for example:

- [http://ncu.catalog.acalog.com/preview\\_program.php?catoid=19&poid=3279&returnto=3340](http://ncu.catalog.acalog.com/preview_program.php?catoid=19&poid=3279&returnto=3340)
- [http://ncu.catalog.acalog.com/preview\\_program.php?catoid=19&poid=3245&returnto=3340](http://ncu.catalog.acalog.com/preview_program.php?catoid=19&poid=3245&returnto=3340)

In its registration application, the University affirms that it will comply with the provisions of Iowa Code Section 261B.7. These provisions state that the school may not claim Commission “approval” or “accreditation,” but must disclose to students that it is registered by the Commission and provide Commission contact information for students who have questions or complaints about the school. The University discloses this information on its website at <https://www.ncu.edu/privacy/student-grievance> and <https://www.ncu.edu/consumer-info/state-regulatory-information>.

*Financial Responsibility:* Northcentral University submitted a copy of an independent audit conducted by Crowe Horwath LLP, dated April 14, 2017, for the institutional fiscal years that ended on December 31, 2015 and 2016. The auditors stated their opinion that the consolidated financial statements of NCU Holdings, LLC, and its subsidiary (i.e., Innova) and its wholly owned subsidiary Northcentral University presented fairly, in all materials respects, the company’s financial position.

- A for-profit institution that participates in the federal student aid programs must maintain a composite score, based on a three factor financial responsibility ratio, of at least 1.5 in order to be determined “financially responsible” without additional oversight. The most recent composite score reported for the University by the federal Department of Education is 0.2. Thus, in order to be considered financially responsible for the purpose of participating in the federal student aid programs, the University must maintain a bank letter of credit payable to the federal Department of Education. The University’s current letter of credit in the amount of \$12,091,783 is valid until November 30, 2018.
- In order to maintain eligibility to participate in the federal student aid programs, a for-profit institution is prohibited from deriving more than 90% of its revenue from Title IV aid. This is commonly known as the “90/10 ratio.” The most recent 90/10 ratio reported by the federal Department of Education for Northcentral University is 78.11% for the institutional fiscal year ending December 31, 2015.

*Full-Time Iowa Resident Faculty Member or Program Coordinator:* Iowa administrative rules do not require a school registers to provide distance education programs to employ a full-time faculty member or program coordinator devoted to Iowa students. However, the University employs one full-time and two part-time faculty members who work remotely for the University from an Iowa location.

*Instructional/Supervisory Staff Qualifications:* The University submitted the academic credentials for 425 faculty members teach for the University. This list also includes the faculty

member's degree specialization and the University School in which the faculty member teaches. All 425 faculty members have a doctoral degree. The University states on its website that it maintains a 100% doctoral faculty. The 2015 WASC Team Report verifies that this is the case.

Educational expertise among the 425 faculty members submitted to the Commission for review include the following subject matter areas:

- Business administration, international business, organizational leadership, finance, management, economics, and marketing;
- Instructional systems, curriculum and instruction, learning management, adult continuing education, vocational education, special education, physical education, reading education, educational technology management, instructional design and development, education leadership, education research and evaluation, higher education including leadership, and community college leadership;
- Family and child development, marriage and family therapy, human development, human ecology, social work, applied social research, and counselor education;
- Criminology and homeland security management
- Public administration, political science, government, and global affairs;
- Health, educational, forensic, media, clinical, and experimental psychology;
- Risk management;
- Conflict analysis and resolution;
- Information systems organization, management, and security;
- Healthcare administration and nursing;
- Statistics and mathematics;
- Research methodology;
- Architecture;
- Athletic administration, sport and leisure studies, and kinesiology;
- Mass communication.

*Commitment to Iowa Students and Teach-Out:* By executing an electronic signature on the registration application, Northcentral University President and CEO George A. Burnett committed to the delivery of programs the University offers and agreed to provide alternatives for students to complete programs at the University or another school if the University closes a program, or if the University closes before students have completed their courses of study.

*Student Complaints:* None.

### **Compliance with Iowa Code Chapter 714**

#### *Section 714.18 – Evidence of Financial Responsibility*

Northcentral University has filed satisfactory evidence of financial responsibility under Iowa Code Section 714.18. The University has a current continuous corporate surety bond in the amount of \$50,000 payable to the State of Iowa and issued by Westchester Fire Insurance Company.

*Section 714.23 – State Tuition Refund Policy*

The University's tuition refund policy for Iowa resident students who withdraw from its distance education programs complies with the provisions of Iowa Code Section 714.23. See "Registration Compliance" above for more information.