IOWA COLLEGE STUDENT AID COMMISSION

William Penn University
Voluntary Application for Postsecondary Registration in Iowa
May 11, 2018

STAFF ACTION:

Approve William Penn University’s voluntary application for postsecondary registration in Iowa for a two-year term that begins retroactively on April 28, 2018 and ends on April 28, 2020.

Registration Purpose

William Penn University (WPU or “the University”) lawfully operates a postsecondary, degree-granting institution in Iowa under an exemption from registration in Iowa Code §261B.11(1)(j): “Higher education institutions that meet the criteria established under §261.9(1).” The criteria referenced in Iowa Code §261.9(1), establish institutional eligibility for the Iowa Tuition Grant Program. WPU meets the Iowa Tuition Grant Program institutional eligibility criteria. Whether an institution actually awards funds from this state grant program is irrelevant.

Thus, WPU is not required to seek the explicit approval of the State of Iowa in order to lawfully offer postsecondary degree programs in Iowa. Additionally, for the purpose of the federal Department of Education’s rules in 34 CFR §600.9 that require federal student aid participating schools to be authorized by an action of the State in which the school is located, WPU is listed in Iowa Administrative Code 281-Chapter 21, by name, as a private nonprofit, degree-granting postsecondary educational institution that lawfully operates in Iowa.

However, in order to participate in the Commission's interstate distance education reciprocity program also known as SARA, an Iowa institution must be in compliance with Iowa Code Chapter 261B, either by seeking the Commission’s approval as an exempt school under Iowa Code Section 261B.11(2), or by voluntarily seeking the Commission’s approval as a registered school. William Penn University has elected, voluntarily, to renew its official designation by the Iowa College Student Aid Commission as a registered school under Iowa Code Chapter 261B.

Institutional Information

WPU is a private, non-profit postsecondary institution that provides instruction via face-to-face and distance education delivery modalities from its main campus located at: 201 Trueblood Avenue, Oskaloosa, IA 52577 with a new location at 5525 Merle Hay Rd Johnston, IA 50131. The University’s chief executive officer is WPU President John E.E. Ottosson at 201 Trueblood Avenue, Oskaloosa, IA 52577. The designated Iowa contact person for WPU is Holly Wengert, Director of Online Learning.
The Iowa Secretary of State records an active, domestic non-profit corporation registration # 87586. The registered agent is Bonnie L. Johnson, Chief Financial Officer/Vice President of Finance at 201 Trueblood Avenue Oskaloosa, IA 52577.

The William Penn University Board of Trustees is composed of the following individuals: (The University did not provide profiles for the Board of Trustees.)

- David Ahmad, Financial Advisor, Edward Jones
- Joe Crookham, President and CEO, Musco Corporation
- Rita Davis, Mental Health and Alternative Therapies, rEE Generation, LLC
- Kaye DeLange, Facility Manager, Cargill Inc
- Jerry Ellis, Director and Chair Audit Committee, Arthur Davis (Retired)
- General Tommy Franks, U.S. Military, Commander US Central Command (Retired)
- Greg Harris, Vice President, General Reinsurance Corp (Retired)
- Christopher Hyland, Chief Financial Officer, Musco Corporation
- Berry Johnson, High School Principal at Hampton-Dumont Community Schools (Retired)
- Irving Jones, President, ICJ & Associates, LTD
- Reginald Martin, Iowa Yearly Meeting of Friends
- Ruth Neubert, People’s State Bank
- Dr. Eric Nichols, University Division Advisor, Indiana University
- Samuel Ritchie, Principal, Pekin Elementary School
- Rob Schultze, Private Consultant, various Chicago- and Michigan- based banks
- Tom Showalter, General Superintendent
- Jim Kobus, WPU Alumni Association President: Dallas Center Grimes Community School District (Retired)
- Rob Talbot, Executive Director and CEO, Quaker dba White’s Iowa Institute
- General Guy Vander Linden, Member of the Iowa House of Representatives: U.S. Marine Corp Brigadier General (Retired)
- Sylvia Graves, Mooresville Schools – Indiana (Retired)

The following individuals comprise the academic and operational leadership at William Penn:

- John Ottosson, MBA, President: Mr. Ottosson has been the President at the University since 2014. He previously worked in Admissions and Financial Aid and Advancement at the University.
- Mike Foster, BS: Mr. Foster is the Director of Information Services at the University and he has served in this role since 2013. Previously he was the Segment Director of Programming & Business Unit Director at United Information Services.
- Bonnie Johnson, BA: Ms. Johnson is the Chief Financial Officer/Vice President of Finance and she has served in this role since 2010. Previously she was the Accounting Manager and Financial Aid Officer at the University.
• Nik Rule, MBL: Mr. Rule is the Athletics and Student Activities Director and he has served in this role since 2017. Previously he was Director of Corporate/Foundation Relations and Athletic Booster Club.

• Marsha Riordan, BA: Ms. Riordan is the Vice President for Advancement and she has served in this role since 2016. Previously she was Associate Vice President for Advancement and Director of Admissions.

• Dr. Noel Stahle, PhD and JD: Dr. Stahle is the Vice President for Academic Affairs, Academic Dean and he has served in this role since 2009.

• Kerra Strong, MBL: Ms. Strong is the Vice President for Enrollment Management and she has served in this role since 2014. Previously she was Director of Admission at the University.

• Jared Pearce, PhD, Faculty Representative: Dr. Pearce is an Associate Professor of English.

Physical facilities: The WPU campus contains adequate physical facilities for its residential program. Among its major buildings are:

• Penn Hall – The hall houses classrooms, laboratories, computer labs, faculty and administrative offices.

• Penn Activity Center (PAC) – The activity center has clinics, classrooms, Athletic Hall of Fame and the Athletic Training room.

• Dana M. Atkins Memorial Union – The union serves as a gathering spot for students and visitors. Campus counselors, Student Success Center, and the Residence Life offices are also located in the union.

• Edwin McGrew Fine Arts Center – The center is where fine arts classrooms and practice rooms are located.

• Musco Technology Center (MTC) – This center is where the Applied Technology and Digital communication programs call home. The live broadcasting studio and radio station are located in the center.

• Field House – This is the school’s athletic complex with athletic offices and fitness center located in this facility.

• Spencer Chapel – The chapel is currently under renovations to restore the facility to its former function of chapel and concert hall. The lower level will have classrooms and faculty offices.

• Wilcox Library – The Library has databases, journals, eBooks, and two video streaming services, giving students research resources. Desktop and laptop computers are available for student use.


Instructional Methodology: WPU offers courses and programs via in-person instruction, distance education, and hybrid programs utilizing both face-to-face instruction and online instruction.
Both distance and residential courses use the learning management system Moodle for classroom content. This includes discussion forums as well as drop boxes for assignments. Adobe Connect is used for some class discussion as well. The faculty employ several techniques to get materials to students including videos containing lecture materials, PowerPoint presentations, open and closed forums, and emails.

Additionally, the University uses a new technology in which students can choose to be at multiple sites or online. In the new system, “Here, There and Everywhere,” students can choose week over week to attend class, or to be online. Students that are out of state can be connected through this system and use Zoom to virtually access a class. Zoom is a conferencing service similar to Go-To meeting or Skype.

**Accreditation:** WPU is accredited by the Higher Learning Commission, a regional accrediting agency recognized by the federal Department of Education. In addition, WPU has programmatic accreditation from the Commission on Collegiate Nursing Education (CCNE) to offer the R.N.– B.S.N. program.

**Federal Stafford Loan Cohort Default Rate:** The most recent official data from the federal Department of Education has determined WPU’s federal Stafford Loan default rate for fiscal year 2014 at 12.5%. The national average default rate of all schools during that time is 11.5%.

**Graduation Rate** (the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion as reported to the federal Department of Education): WPU reports a graduation rate of 33%.

**Average Loan Debt upon Graduation:** WPU provided average loan debt upon graduation with a baccalaureate degree is $28,142.

**Record Preservation:** WPU’s current student records (beginning in the 1980s) are stored electronically in two primary systems: Jenzabar CX Student Information System (SIS) and Moodle. Online data available directly in the SIS and Moodle are held in the primary WPU data center on storage area network devices where a component splits up data across drives to increase performance backed up by a secondary component that can be placed into service immediately if the primary component fails. The secondary component data center contains equipment capable of running the university at a reduced service level should a disaster wipe out the primary data center. Additionally, electronic student records are backed up to tape each night and are held offsite in a secured location. Tapes are held for 6-8 months before being recycled. Transcripts are held in the system indefinitely.

**Transcript Requests:** Any current or former student wishing to obtain a transcript may do so by contacting:

Registrar's Office  
Penn Hall, Room 217
Student Learning Resources:

- WPU has implanted a Student Success Center as a student resource designed to encourage independent learning. Student tutors are available at no cost to help all students study for an upcoming test, write a research paper, or assist with an important presentation. Tutoring is available Monday through Sunday until 9pm. A schedule is sent out to students every week with any changes in this schedule and how to access those services. Help is available for most subjects with emphasis on writing, math and computer skills. More about the Student Success Center can be found on the University’s website at https://www.wmpenn.edu/student-life/student-services/student-success-center/.

- Distance education students have access to the Library’s online resources http://wmpenn.beta.libguides.com/library. The Library includes 82 databases https://wmpenn.libguides.com/az.php sorted alphabetically in topical areas that align with the academic subject matter that is the focus of programs the University offers. Popular databases the University offers include Academic OneFile, Academic Search Complete, CQ Researcher, and EBSCOhost. Additional research resources include journals, eBooks, magazines and newspapers articles. The University Librarians have created Research Guides http://wmpenn.libguides.com/c.php?g=716184&p=5095982 that provide research guidance for students in academic subject matter areas and offer information about locating Library resources, preparation for tests such as Praxis (for teacher candidates), and scholarly skills such as writing a research paper. The University has dedicated Librarians available to assist students and provides names, telephone numbers, and personal email addresses https://wmpenn.libguides.com/libraryinformation. Students may utilize Ask a Librarian when chat is available or a student may email or call the Library (not toll-free). Many of the Library resources are available behind a student portal and may not be accessible by the public. Library hours are Monday through Friday 8am to 5pm, closed on Saturday and Sunday.

- All registered students can utilize the free counseling services https://www.wmpenn.edu/student-life/student-services/counseling-center/. The services include individual and group counseling, crisis intervention, conflict resolution and referrals.
- WPU offers the opportunity for students to participate in a Career Mentoring Program [https://www.wmpenn.edu/student-life/student-services/career-mentoring-program/](https://www.wmpenn.edu/student-life/student-services/career-mentoring-program/). The program matches students with a mentor with work experience to help set and achieve career goals. The communication between mentor and mentee can be in-person or other communication depending on the preferences of the participants.

- WPU offers Career Services [https://www.wmpenn.edu/student-life/student-services/career-services/](https://www.wmpenn.edu/student-life/student-services/career-services/) which supports distance and on-ground students as they transition to the workplace, advanced degrees, new careers, advancement in their current positions, or professional development. Career exploration opportunities such as job shadowing and internship programs are available. Career services can also assist students with searching for part-time jobs during the school year and summers, and help with job placement as students near graduation. Career Services provides resources and information on job search strategies, resume and cover letter development, interview techniques, occupational outlook, job market trends, graduate programs, and technology impact on the job search.

**Curriculum Evaluation and Development:** All WPU’s curriculum and programs must go through the curricular process of the main campus. New programs are put forth through the committee process of PEC (Program Excellence Committee). From that they are sent to Academic Council, which is the academic management arm. Next to cabinet and ultimately to the board. The divisions and faculty from that division are the ones to put together the required information including justification for the new major, ROI information, marketing and potential enrollment.

**Student Complaints Process:** William Penn University discloses its grievance policy on their website at [https://www.wmpenn.edu/wp-content/uploads/2017/06/Student-Complaints-and-Grievances.pdf](https://www.wmpenn.edu/wp-content/uploads/2017/06/Student-Complaints-and-Grievances.pdf). When a student has a complaint or grievance, the student should first meet with the faculty member, staff member or university administrator directly involved in the dispute in an attempt to resolve the complaint or grievance. If the complaint or grievance remains unsolved, the student may file a written account of his or her grievance with the appropriate academic dean in cases where the dispute involves teaching faculty, or the appropriate supervisor where the dispute involves other university employees.

A Student Grievance Form is available in the Office of the Vice President for Academic Affairs. This notification shall contain a statement indicating the intention of the student to proceed with the grievance, and the relief requested. The academic dean, appropriate supervisor, or designee, shall respond in writing to the student within 14 days of receipt of the written, signed notice of grievance.

If the grievance is not resolved at the meeting with the supervisor, the student may appeal to the area vice president. The area vice president shall consider the appeal and make a decision. The vice president shall respond in writing to the student within
14 days of receipt of the written, signed notice of appeal. If the complaint is with the area vice president, the student may appeal to the President of the University suing the same process described above.

If the grievance is not resolved at the meeting with the area vice president, the student may appeal to the University president, who will consider the appeal and make a decision. The University President shall respond in writing to the student within 14 days of receipt of the written, signed notice of appeal. The decision of the President is final and binding.

Programs Offered Under Registration
(Note: The programs listed below are only those for which William Penn University may need coverage under the State Authorization Reciprocity Agreement (SARA) policies and rules. However, William Penn University’s registration authorization to operate at a location in Iowa is at the institutional level; thus, the Commission authorizes the institution to offer all of its programs in Iowa).

The estimated total charge for tuition, fees, books, and supplies applicable to each program is listed below.

Residential Programs
Baccalaureate Programs

Distance Education Programs
Baccalaureate Programs (Online format)
- Bachelor programs with majors in – Business Management, Elementary Education, Human Resource Management, Human Services, Interdisciplinary Studies, Nursing (RN to BSN)**, Psychology, Sociology - $59,975.

Residential and Distance Education Program
Master’s Program
- Master of Business Leadership - $19,080.

Post Graduate Endorsements
- English as a Second Language (K-12) - $170 per credit hour.
- Reading (K-8) - $170 per credit hour.
- Strategist I (K-8) - $170 per credit hour.
The University is approved by the Iowa Department of Education to offer first-time teacher licensure preparation programs.

The Iowa Board of Nursing has approved William Penn’s RN to BSN program.

Field Experiences
Structured field experiences are a required part of the curriculum for the following programs:

- Elementary and Secondary Education: WPU Education programs require a number of field experiences and opportunities to work with students and licensed teachers in local schools. The student teaching experience at WPU meets state licensure requirements for initial licensure because it includes a full-time experience for a minimum of 14 consecutive weeks during the student’s final year of the practitioner preparation program. Student teaching can be completed at schools in the region or elsewhere in the U.S.

- RN-BSN: More than 150 hours of clinical experience are spent in a variety of hospitals, medical centers and community-based health settings. Clinical hours can be completed at schools in the region or elsewhere in the U.S.

- Bachelor of Arts in Human Services: A student enrolled in this program must complete a three credit-hour practicum that requires a minimum of 100 hours of field experience in an agency or organization that provides individual or community human or social services.

- Bachelor of Arts in Psychology: Students enrolled in this program must complete a three credit-hour practicum that includes some field experience and some seminar discussion. Students will work a minimum of 100 hours in an area of human services or other work setting where human services skills and psychological knowledge are relevant.

- Bachelor of Arts in Sociology: A student enrolled in this program must complete a three credit-hour course in sociology research methodology, theory, and practice involving 100 hours of relevant service learning.

Registration Compliance
As required by Iowa Code §261B.4, WPU disclosed its policy on refunding tuition charges students who fail to complete the enrollment period for which they were charged. The policy is found on the school’s website and in the WPU catalog at:

- [https://www.wmpenn.edu/admissions-aid/tuition-fees/institutional-refund-policy/](https://www.wmpenn.edu/admissions-aid/tuition-fees/institutional-refund-policy/)

Administrative rules specifically require the school to comply with the requirements of Chapter §261.9(1) “e” through “h” by implementing the following policies.

- Iowa Code §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 §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. William Penn University provided compliant policies that address both of these requirements. These policies are disclosed to students in the WPU Student Handbook and to prospective students and the public on the University’s website at the following locations:

- Iowa Code §261.9(1)(g) requires a school to maintain a special policy concerning institutional charges for members 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, when the service member of spouse must withdraw from the school because the service member has been called to active (Iowa) state or federal military duty or service. WPU provided a policy that is compliant with this requirement and will discloses the policy to students through the University’s Financial Aid webpage.
  - [https://www.wmpenn.edu/admissions-aid/tuition-fees/institutional-refund-policy/](https://www.wmpenn.edu/admissions-aid/tuition-fees/institutional-refund-policy/).
- Iowa Code §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. WPU provided a compliant policy to staff as part of its registration application. WPU discloses the policy to employees at hire in the Faculty/Staff Handbook that contain the policies of the university relative to campus security.

**Student Consumer Information:** In its registration application, the University affirms its willingness to comply with the requirements of Iowa Code §261.9, as stipulated by Iowa Code §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. These disclosures are in place and available to students through WPU’s undergraduate and graduate student handbook, which is available to students through the University’s webpage and various other readily accessible University web pages, including those that address each specific WPU program at the following location:

Iowa Code §261B.7 states that, while a school must not represent that it is “approved” or “accredited” by the Commission or the State of Iowa, a registered school must disclose that the school is registered by the Commission on behalf of the state of Iowa and provide the Commission’s contact information for students who wish to inquire about the school or file a complaint. The University currently discloses the
Commission’s contact information for student complaint purposes and provides a direct link to the Commissions constituent complaint form at https://www.wmpenn.edu/admissions-aid/financial-aid/consumer-info/.

Financial Responsibility: WPU submitted the audit report of an independent accounting firm TD&T CPAs and Advisors, P.C. dated March 12, 2018, covering the institution’s financial position through June 30, 2017 and 2016. The accounting firm stated its opinion that the school’s financial statements present fairly, in all material respects, the school’s financial position.

A private non-profit school 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 by the federal Department of Education to be financially responsible without additional oversight. WPU’s independent auditor did not report nor test WPU’s financial responsibility composite score. The most recent financial responsibility composite score reported for WPU by the federal Department of Education is for the institutional fiscal year ending June 30, 2016, when WPU’s composite score was 1.7 (out of a possible 3.0).

Full-Time Iowa Resident Faculty Member or Program Coordinator: WPU employs 43 full-time, Iowa-based faculty members. Additional information about faculty appears below.

Instructional/Supervisory Staff Qualifications: WPU maintains easily accessible information about faculty on each of its web-based program main pages https://www.wmpenn.edu/get-to-know-wpu/contact-directory/faculty-profiles/. A sampling of faculty qualifications is listed below.

- Applied Technology programs: Of the twelve faculty members reviewed, three have doctoral degrees in education, industrial technology and mathematics and the others have a master’s degree.
- Business Administration programs: Of the four faculty members reviewed, two have doctoral degrees in economic history, educational leadership and policy studies and all have graduate degrees.
- Education programs: Of the ten faculty members reviewed, two have a doctoral degrees in educational leadership and all have graduate degrees in counseling, elementary education, administrative leadership and supervision in education, and special education.
- Health & Life Sciences programs: Of the seven faculty members reviewed, five have doctoral degrees in kinesiology, developmental biology, biochemistry and the others have a master’s degree.
• Humanities programs: Of the ten faculty members reviewed, two have a doctoral degrees in English and religion and the others have a master’s degree.

• Social & Behavioral Science programs: Of the five faculty members reviewed three have doctoral degrees in sociology, public administration, and American religious history.

• Nursing programs: Of the two faculty members reviewed one has a doctoral degree in education-leadership focus, the other faculty member has a master’s degree.

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

Compliance with Iowa Code Chapter 714

§714.18 – Evidence of Financial Responsibility: WPU is exempt from the financial responsibility (i.e., bonding) requirements of Iowa Code §714.18. The University qualifies for the following exemption listed in Iowa Code §714.19, subsection 10: “Private nonprofit schools that meet the criteria established under Iowa Code §261.9(1). The criteria established under Iowa Code §261.9(1), is the institutional eligibility criteria that qualifies a school for participation in the Iowa Tuition Grant program. WPU meets the institutional eligibility criteria, and therefore qualifies for the financial responsibility exemption. For this purpose, whether a school actually awards funds from the Iowa Tuition Grant program is immaterial.

§714.23 – State Tuition Refund Policy: The Iowa tuition refund policy does not apply to WPU because it is a private nonprofit institution.

Compliance with Iowa Code Chapter 261F

WPU posts on its website a Code of Conduct for Educational Loans https://www.wmpenn.edu/uploadedFiles/wmpennedu/Admissions/Financial_Aid/Educational%20Loan%20Code%20of%20Conduct%2010-11.pdf (which includes a link to a more detailed policy) that addresses provisions of Iowa Code Chapter 261F. WPU’s Code of Conduct appears to be an accurate and comprehensive reflection of Iowa Code provisions that govern certain aspects of business relationships between private education loan lenders and school personnel who have responsibilities related to education loans. WPU does not provide information on private loans on its website and upon directs students to independently find and secure any necessary private funding. Staff finds no evidence that the school participates in any preferred lender arrangement or otherwise refers its enrolled students to any specific private education loan lender.