

IOWA COLLEGE STUDENT AID COMMISSION

Clarke University Application for Voluntary Postsecondary Registration in Iowa June 10, 2016

STAFF ACTION:

Approve Clarke University's voluntary application for postsecondary registration in Iowa for a two-year term that begins on June 10, 2016, and ends on June 10, 2018.

Registration Purpose

Clarke 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. Clarke University meets the Iowa Tuition Grant Program institutional eligibility criteria. Whether an institution actually awards funds from this state grant program is immaterial.

Thus, the University is not required to seek the explicit approval of the State of Iowa in order to lawfully offer postsecondary degree programs in Iowa. 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, Clarke University 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.

Institutional Information

Clarke University 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 1550 Clarke Drive, Dubuque, Iowa. Clarke also provides instruction at an additional location in Dubuque, Iowa, and in Cedar Falls, Iowa. The University's chief executive officer is Joanne M. Burrows, Ph.D. at the same address. The designated Iowa contact person for the University is Jo Lobertini, at the same address. The Iowa Secretary of State records an active, domestic non-profit corporation registration #56009 for Clarke University. The Iowa registered agent is the University's President, Joanne M. Burrows.

Physical facilities: The campus in Dubuque, Iowa provides multiple facilities dedicated to academic instruction and residential life, a library, a theatre, a student activity center, a science center, a bookstore, a sports complex, a recreational and fitness center, a chapel, and administrative offices. A map of the campus is available online at <http://www.clarke.edu/page.aspx?id=8546>.

Instructional Methodology: Clarke University offers courses and programs via in-person instruction, distance education, and in a hybrid format, i.e., a combination of both online and in-person instruction. In a hybrid course or program traditional face-to-face instruction is reduced by not eliminated, and education received is the same as in a face-to-face class. Skills necessary for hybrid courses and programs include downloading

files, attaching document files to email and using word processing software. Instructors provide students with orientation to the class on the first scheduled class meeting.

The University uses Moodle as its online Learning Management System. Students attend mandatory orientation provided by their instructor before their first hybrid course. An online orientation learning module is also available to students through the online student portal. Through Moodle, students access course content including assignments, participate in asynchronous, online discussion forums, receive course updates via email, access assignment feedback, quizzes, and grades, and respond to surveys about courses and course instructors. Moodle also facilitates online chat, allowing for real-time synchronous discussion. Attendance for the class meeting on campus will follow the same policy as a traditional class. An on-line class absence may be identified as a missed assignment or inactivity in the course site, which the instructor is able to track. It is up to the instructor to determine their specific grading, attendance, and participation standards, which should be listed in their syllabus.

Accreditation: Clarke University is accredited by the Higher Learning Commission, a regional accrediting agency recognized by the federal Department of Education. In addition, the University has programmatic accreditation from the following entities, all of which are also recognized by the federal Department of Education, for specific programs the University offers:

- Commission on Collegiate Nursing Education (CCNE), for the University's baccalaureate and doctoral level nursing programs.
- American Physical Therapy Association, Commission on Accreditation in Physical Therapy Education, for the University's professional programs for the physical therapist.

Federal Stafford Loan Cohort Default Rate: 4.2%. For comparison purposes, the national average default rate of all schools for the same reporting period is 11.8%.

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): 74%.

Average Loan Debt upon Graduation: \$25,650 is the average loan debt upon graduation.

Record Preservation: Almost all student records are created and managed within Moodle. These records are a part of the network files. The network files information system is backed up nightly, seven days a week by the information technology office. The day one tape is put in the tape drive on the 1st day of the month and runs that night; the day two tape is used on the 2nd day of the month, and so on. Network tapes are rotated on a monthly basis. All day one tapes are kept off-site. Any paper copy of a student record is stored in the appropriate academic office and stored according to the internal retention schedule.

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

Clarke Registrar's Office
1550 Clarke Drive
Dubuque, IA 52001
(563) 588-6314
<http://www.clarke.edu/page.aspx?id=10408>

Student Learning Resources:

- Library services - A collection of over 175,000 items including 90,000 online electronic books and 40,000 online electronic full text journals are available anytime to all students. Clark participates in interlibrary loan which expands the amount of material available to students by utilizing publications available at other participating libraries.
- The MARC Center - The center supports students' classroom experiences across disciplines, helping them develop and reinforce those skills essential to academic success and lifelong learning. Services include the [Writing Center](#), with individualized assistance with all phases of the writing process; the [Learning Center](#), with Academic Coaching for time management, note-taking, learning, study strategies and reading strategies; SWAG (Study with a Guide) for peer-facilitated study sessions in select courses; Coffee Chats, Workshops and Mentoring; and [Accommodation Services](#).
- Career Services – offers supports which allow opportunities for practice and critique on resume writing, interviewing, and job seeking assistance.
- Technology Supports – Clarke has implemented an E-learning support desk staffed by professional academic technology specialists during library hours to support students and faculty in all areas of academic technology.

Curriculum Evaluation and Development: The Educational Policy Committee is the policy formulating body for all matters of an academic nature pertaining to undergraduate studies. This group works in conjunction with the General Education Advisory Committee to determine the composition of the curriculum fulfills the major requirements for each specific program and to ensure the quality and centrality of the liberal arts curriculum for the undergraduate programs. These two groups communicate their recommendations to the academic department for any subsequent committee decision requiring curriculum change and implementation. The Graduate Council is responsible for establishing and reviewing policies and procedures governing graduate education. The council evaluates new graduate programs and revisions in existing programs and makes recommendations to the administration for action. New courses, courses requiring minor revision and academic procedures related to graduate programs are reviewed and acted upon by this council. The Graduate Council reports to the Vice President for Academic Affairs through the Dean for Adult and Graduate Studies.

Student Complaints Process: Clarke provides student grievance procedures that cover grade challenges, academic integrity policies, student conduct and disciplinary procedures, and discrimination and harassment. Clarke also provides students information to outside agencies students may direct complaints to if the student is not satisfied with the administrative outcome of a complaint.

- ✓ <http://www.clarke.edu/page.aspx?id=26082>.

Programs Offered Under Registration

(Note: The programs listed below are only those for which Clarke believes coverage under the State Authorization Reciprocity Agreement (SARA) may be necessary. However, the University's registration authorization to operate at a location in Iowa is at the institutional level; the Commission authorizes the institution to offer all of its programs in Iowa.)

In addition to campus based programs which may offer field experiences, Clarke also offers hybrid programs in their Time Saver Program – Adult Studies. The estimated total charge for tuition, fees, books, and supplies applicable to each Time Saver Adult Studies program is listed below.

Hybrid Programs Offered at the Clarke University campus in Dubuque, Iowa

Baccalaureate Degree Programs

Business Administration; Computer Information Science; Instructional Technology; RN to BSN; and Supervision and Leadership - \$15,730

Graduate Degree Programs

Doctor of Nursing Practice - \$70,885

Master of Business Administration and Master of Organizational Leadership - \$21,700

Distance Education Programs

Graduate Degree Programs

Master of Arts in Education - \$19,940

Field Experiences (including Distance, Hybrid, and Residential Programs):

- Education Majors - Student teaching is a full-time experience in the school that includes observation, provides for expanding responsibilities, including participation in a broad range of activities of a practitioner in a school, and provides for intensive and continuous involvement until the student assumes major responsibility for the full range of teaching duties. The student-teaching experience shall continue, under the direction of the campus supervisor and the cooperating practitioner, until the student has achieved the stated objectives of the program. Field experience can occur locally or nationally.
- Environmental Studies - Students are placed with a community partner for a semester or year to focus deeply on a multi-faceted environmental issue. Students use their interdisciplinary knowledge and skills to study the particular situation of the community partner and to propose and evaluate possible solutions. Field experience can occur locally or nationally.
- Nursing programs – the undergraduate and graduate programs include several courses requiring on-site clinical practice. Field experience may occur locally or nationally.
- Religious Studies - Students engage in a formal process of theological reflection in consultation with their on-site ministry supervisor and a department faculty member. Field experience can occur locally or nationally.
- Social Work – Both undergraduate and graduate social work students complete actual social work practice in a social service agency. Field experience can occur locally or nationally.
- Sport Management - Students apply classroom knowledge, to assess professional development, to identify the areas of the profession to pursue for employment,

and to develop professional contacts in the sport industry. Students may work within a variety of sport settings that are related to their respective career goals. In conjunction, weekly updates offer students an opportunity to compare, contrast, analyze, and evaluate their experiences in the sport industry and to evaluate their development as a sport professional. Field experience can occur locally or nationally.

- Master of Organizational Leadership - Students will focus on integration of the theoretical concepts into the current work environment. Field experience can occur locally or nationally.
- Doctor of Physical Therapy - students learn physical therapy skills in a controlled clinical setting under the supervision of faculty members.
- Many of the Clarke programs include a capstone or practicum course which requires on-site experience which depending on the course may be completed locally or nationally.

Registration Compliance

As required by Iowa Code §261B.4, Clarke University disclosed its policy on refunding tuition charges for withdrawn students on its website.

- ✓ <http://www.clarke.edu/page.aspx?id=1706>.

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. Clarke discloses these policies in its student handbook.
 - ✓ http://www.clarke.edu/media/files/Student_Life/Student_Handbook/Student%20Handbook%202015-16%20FINAL.pdf at 34 and 42.
- 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 or spouse must withdraw from the school because the service member has been called to active (Iowa) state or federal military duty or service. Clarke University maintains a policy that is compliant with this requirement and will disclose the policy to students in its online Academic Catalog.
 - ✓ http://www.clarke.edu/media/files/Financial_Aid/megan.thole@clarke.edu_Student%20Consumer%20Information%20Report%20Updated_April%202016.pdf.
- 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. Clarke University had already adopted this policy as part of its Employment Policies manual and is provided to all employees at hire.

- Iowa Code §261B.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 the Academic Catalog and at the tuition and fees webpage on the school website.
 - ✓ <http://www.clarke.edu/page.aspx?id=26599>.
 - ✓ <http://www.clarke.edu/page.aspx?id=22560>.

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. Upon registration approval, Clarke University will disclose its voluntary registration with the Commission on its state authorization webpage.

- ✓ <http://www.clarke.edu/page.aspx?id=26082>.

Financial Responsibility: Clarke University submitted the financial audit report of an independent accounting firm, EideBailly CPAs & Business Advisors, dated October 26, 2015, for the institutional financial position as of May 31, 2015 and 2014. 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. Clarke's independent auditor did not report nor test the Clarke's financial responsibility composite score. The most recent financial responsibility composite score reported for the University by the federal Department of Education is for the institutional fiscal year ending May 31, 2014, when Clarke's composite score was 3.0 (out of a possible 3.0).

Full-Time Iowa Resident Faculty Member or Program Coordinator: Clarke employs 89 full-time, Iowa-based faculty members. Additional information about faculty appears below.

Instructional/Supervisory Staff Qualifications: Clarke maintains easily accessible information about faculty on its website, organized by program, at <http://www.Clarke.edu/academics/Faculty.cfm>. Staff reviewed a sampling of faculty profiles for faculty who provide instruction in each of the following programs:

- Business Administration programs – Of nine faculty members reviewed, five have doctorate degrees and eight have graduate degrees in business programs.
- Nursing programs – Of eight faculty members reviewed, six have doctorate degrees and all have graduate degrees in nursing programs.
- Education programs – Of nine faculty members reviewed, five have doctorate degrees, and all have at least one graduate degree in education programs.

Commitment to Iowa Students and Teach-Out: By executing an electronic signature on the registration application, Clarke University President Joanne M. Burrows committed to the delivery of programs Clarke offers and agreed to provide alternatives for students to

complete programs at Clark or another school if Clarke closes a program, or if the University closes before students have completed their courses of study.

Additional Information

Compliance with Iowa Code §714

§714.18 – Evidence of Financial Responsibility

Clarke University 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(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. Clarke 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 Clarke University because it is a private nonprofit institution.

Compliance with Iowa Code §261F

Clarke University posts on its website a Code of Conduct for Educational Loans addresses provisions of Iowa Code §261F. The Clarke 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. Clarke does have a preferred lender list which is implemented through Fast Choice but is in compliance with §261F and does disclose a student may utilize any private loan lender of their choosing.