

IOWA COLLEGE STUDENT AID COMMISSION

Hamilton Technical College Application for Voluntary Postsecondary Registration in Iowa September 2, 2016

STAFF ACTION:

Approve Hamilton Technical College's application for voluntary registration in Iowa for a two-year term that begins on September 2, 2016 and ends on September 2, 2018.

Registration Purpose

Hamilton Technical College is currently eligible for an exemption from registration in Iowa Code § 261B.11(1)(n): "A postsecondary educational institution established in Bettendorf in 1969 to prepare students for the federal communications commission radio broadcasting examination." Thus, the school is not required to register with the Commission under Iowa Code provisions. However, Hamilton Technical College (the College) voluntarily requests registration renewal in Iowa in order to comply with federal regulations in 34 CFR § 600.9, which require a school located in a State to be authorized through an action of that State as a condition of participation in the federal student aid programs.

Institutional Information

Hamilton Technical College is a private, for-profit educational institution whose Iowa campus is located at 1011 East 53rd Street, Davenport, IA 52807. The Chief Executive Officer of the College is President, Maryanne Hamilton. The College is registered with the Iowa Secretary of State as a domestic profit institute, under license number, 65416. The effective date is 12/13/1982 with a perpetual expiration date. The College reports Brian Beert as the College's primary point of contact, Brian is located at 1011 East 53rd Street, Davenport, Iowa 52807. His contact number is 563-386-3570 extension 124.

Accreditation: The College is accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC). The accrediting agency is nationally recognized by the United States Department of Education.

Physical Facilities: Hamilton Technical College consists of 34,480 square feet of floor space at 1011 East 53rd Street, Davenport, Iowa 52807. The campus is divided into 15 classrooms used for lecture and laboratory work. The balance of the facility is used for offices, library, and storage. The College also has student parking available at no additional cost to the student. The College does not offer distance education; it offers solely on-campus instruction.

Ownership: As of September 23rd, 2015, the College reported changes to the ownership of the College. Lisa Boyd transferred to the Maryanne Hamilton Revocable Trust dated December 11, 2012, 4,675 shares of HTC non-voting stock; Michelle Carlisle transferred to the Maryanne Hamilton Revocable Trust 4,675 shares of HTC non-voting stock; and the

Maryanne Hamilton Revocable Trust transferred to Orion Education Group USA, LLC 44,100 shares of HTC non-voting stock and 4,900 shares of HTC voting stock. As a result of above action, the Maryanne Hamilton Revocable Trust dated December 11, 2012 owns 45,900 (51%) shares of HTC non-voting stock and 5,100 shares of HTC voting stock (51%). The Orion Education Group USA, LLC owns 44,100 shares of HTC non-voting stock (49%) and 4,900 shares of HTC voting stock (49%).

The College has two additional owners holding over 10%, Troy Harris of the Orion Education Group USA, LLC and Tim Campagna of the Orion Education Group USA, LLC.

In connection to the ownership changes, the membership of HTC's board of directors has changed to the following: Maryanne Hamilton, Lisa Boyd, Troy Harris, Time Campagna, and a fifth member, not yet listed.

Federal Stafford Loan Cohort Default Rate (FFY 2012): 23.7%

For comparison purposes, the FFY 2012, national average cohort default rate is 11.8%.

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 to the federal Department of Education. The graduation rate for Hamilton Technical College is 47%.

Average Loan Debt upon Graduation: The College provided an average loan debt upon graduation for each program that they offer. Those are:

- Diploma in Medical Assisting Technology: \$9500
- Diploma in Medical/ Insurance Coding Specialty: \$6625
- Associate of Science in Electronics Engineering Technology: \$31,514
- Bachelor of Science in Electronics Engineering Technology: \$33,140.

Record Preservation: Hamilton Technical College maintains all student files in a secured fire safe on campus. The files are also kept in digital form using Campus Vue software which is stored in an on-site server. The digital files are backed up hourly to an off-site server housed at DCS Computer Services in Davenport.

Transcript Requests: The College maintains a specific policy in requesting transcripts. All transcripts may be obtained from the Registrar at Hamilton Technical College. Graduates and past or current students may obtain a copy free of charge. All transcript requests must be made on paper through the US Mail, a delivery service, in person, or faxed. The transcript requests must include the student or graduate's signature. E-mailed requests must be printed, filled out and signed. The document should then be scanned into a .pdf and emailed to the registrar. The transcript request form can be obtained from the Office of the Registrar or at <http://www.hamiltontechcollege.edu/transcriptdiploma-request.html>.

Instructional Methodology: The College separates each class day evenly between classroom instruction and laboratory. This equitable split in the day allows lessons taught in theory to be applied immediately in the laboratory environment. Occasionally, a class trip to a business or industry is scheduled for certain classes to supplement the structured curriculum in the course. Students are expected to participate in the field trip.

Student Learning Resources: The College has various resources and services available to students. Those services include:

- MAP (Mentoring, Application, and Preparation) Program: All students are given the option to take advantage of the MAP Program, which is offered at no additional cost to the student. The College maintains this service for those individuals who may feel that they need some assistance with any of their courses, projects, or assignments. Students who wish to use this service may do so by contacting Katrina at 309-269-9705 to arrange a mentor, or by filling out a form located at <http://www.hamiltontechcollege.edu/mentoring-request.html>.
- Student Advising: A Student Services Advisor is available for students who are experiencing a problem or those who need someone to talk to in regards to personal, financial, scholastic issues, among others. The advisor maintains a list of housing options near campus due to the fact that on campus housing is not available. In addition to a list of housing, the advisor also maintains a list of current part-time employment opportunities for students to take advantage of if the need arises throughout the duration of their education. During the course of training, students are encouraged to make full use of this service.
- Library/ Learning Resource Center: The Learning Resource Center is an on-campus facility for all students to take advantage of. Study, research, and tutoring assistance are available through the Learning Resource Center. The Learning Resource Center contains technical journals, periodicals, books, reference materials, and internet access throughout the entire building. Students are encouraged to consult with a librarian if they need assistance or are unable to locate specific literature. The following periodicals are typical of regular subscriptions maintained by the College:
 - ✓ American Journal of Nursing
 - ✓ Assembly
 - ✓ Bloomberg
 - ✓ CMA Today
 - ✓ Entrepreneur
 - ✓ Iowa Medicine
 - ✓ Health
 - ✓ Q-Bits
 - ✓ Computer Graphics World
 - ✓ Wired
 - ✓ CNC Machining
 - ✓ HR Magazine
 - ✓ Quad City Times
 - ✓ Scientific American
 - ✓ USA Today
 - ✓ Make
 - ✓ Popular Science
 - ✓ Fast Company
- All instructors carry smart phones which allow the students to maintain communication when needed via text, email, and/ or phone call.
- Career Services: All students meet with the Career Services Director at three points during their education:
 - ✓ Portfolio Creation
 - ✓ Resume Development
 - ✓ Interview Skills

Additionally, all students have an interview with a faculty member from their field of study who provides them with an evaluation and guidance in accordance to performance.

Curriculum Evaluation and Development: A Program Advisory Committee is maintained by the College as a means to update curriculum. The majority of the Committee consists of employers representing the major occupation or occupations for which training is provided. At least two regularly scheduled meetings must be conducted annually, and minutes for

each meeting are maintained. The duties of the Committee include:

- Review, at least annually, the established curricula of the program and comment as to its objectives, content and length prior to the Commission's recognition.
- Review and comment on each new program including the appropriateness of curriculum objectives, content and length prior to the Commission's recognition.
- Review and comment, at least annually, on student graduation and employment, and where required, state licensing examination outcomes of each program.

Student Complaints Process: If a student of the College has a concern or complaint, they should meet with their instructor. If this does not resolve the issue, the student should see the following people in the following order: Student Services Advisor, Academic Dean, Dean of Students, and then the School Director.

Complainants are encouraged to first address the complaint internally and if that proves to be inadequate, the student may contact the accrediting agency, the Accrediting Commission of Career Schools and Colleges, or the Iowa College Aid office. To file a complaint with Iowa College Aid, the student may fill out a form located at <https://www.iowacollegeaid.gov/content/constituent-request-review>. All complaints received by the accrediting agency must be received in writing. If a student files the complaint with the accrediting agency, the complaint must include the following:

- The basis for any allegation of noncompliance with ACCSC standards or requirements.
- All relevant names and dates and a brief description of the actions forming the basis of the complaint; copies of any documents or materials that support the allegations, when available.
- A release from the complainant authorizing the Commission to forward a copy of the complaint, including the identification of the complainant, to the school. This can be achieved by completing and submitting page two of the complaint form.
- The complaint form can be located at <http://www.accsc.org/UploadedDocuments/Forms/ACCSCComplaintForm.pdf>.
- More information regarding filing a complaint with the Commission may be found at <http://www.accsc.org/Student-Corner/Complaints.aspx>.

Programs Offered In Iowa

Hamilton Technical College offers the following programs at its campus. Total estimated tuition charges, fees, books, supplies, and other costs payable to the school by a student are provided for each program.

Diploma Programs

- Medical Assisting Technology - \$14,500
- Medical/ Insurance Coding - \$14,500
- Heating, Ventilation, Air Conditioning (HVAC-R) Diploma Program
 - This has been approved by the ACCSC and the Iowa Department of Public Health, but will not begin until winter. (50 weeks) \$15,200

Associate Degree Programs

- Associate of Science in Electronics Engineering Technology - \$42,000

Baccalaureate Degree Programs

- Bachelor of Science in Electronics Engineering Technology - \$56,000

**Field Experiences:* The College requires students who are enrolled in certain programs to complete an externship, which is a form of field experience. The programs that require an externship for completion are:

- Medical Assisting Technology: Students are required to complete an externship of 180 hours. This externship may be completed in a number of settings, which include hospitals, doctor offices, or clinics.
- Medical/ Insurance Coding: Students are required to complete 240 hours of field work in a hospital, doctor's office, or clinical setting for completion of the program.
- HVAC-R: Students are required to complete 180 hours of field work in the HVAC industry.

Registration Compliance

As required by Iowa Code § 261B.4, the College submitted a policy for refunding tuition charges to withdrawn students. Since Hamilton Technical College is a for-profit institution, its tuition refund policy must comply with Iowa Code §714.23. Staff determined that the College's policy is compliant and it is currently disclosed in the 2015-2016 College Catalog at:

- ✓ http://www.hamiltontechcollege.edu/uploads/2/4/4/9/24498755/2015.2016_academic_catalog_08.11.2015.pdf and
- ✓ <http://www.hamiltontechcollege.edu/student-financial-services1.html>.

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

- 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. These requirements duplicate policies and disclosures required by the federal Department of Education for a school that participates in the federal student aid programs. Hamilton Technical College maintains drug and alcohol prevention policies, penalties for drug and alcohol violations and sexual violence policies and resources on its website, as follows:

- ✓ http://www.hamiltontechcollege.edu/uploads/2/4/4/9/24498755/2015.2016_academic_catalog_08.11.2015.pdf
- ✓ <http://www.hamiltontechcollege.edu/student-services1.html>
- ✓ <http://www.hamiltontechcollege.edu/services.html>

✓ <http://www.hamiltontechcollege.edu/student-financial-services.html>

- Iowa Code § 261.9(1)(g) requires a school to maintain a special policy tuition and mandatory fee 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. The College maintains a compliant tuition refund policy in its Academic Catalog, http://www.hamiltontechcollege.edu/uploads/2/4/4/9/24498755/2015.2016_academic_catalog_08.11.2015.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. By cross-reference from existing administrative rules for registration [283-21.2(261B), sub§ 7], this policy applies to Iowa's registered schools who compensate one or more parties to conduct instruction or other operational activities on the school's behalf at an Iowa location. The College maintains this policy and discloses it on their website, at <http://www.hamiltontechcollege.edu/sexual-harassment-and-misconduct.html>.

Student Consumer Information: In its registration application, the College affirms its willingness to comply with the requirements of Iowa Code Chapter 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 duplicative of the federal Department of Education's student consumer information disclosure requirements for a school that participates in the federal student aid programs. The College provides this information to prospective students in its Academic Catalog, http://www.hamiltontechcollege.edu/uploads/2/4/4/9/24498755/2015.2016_academic_catalog_08.11.2015.pdf.

The College affirms on the application that it will comply with the provisions of Iowa Code § 261B.7. These provisions of Iowa Code state that, provided the school does not claim "approval" or "accreditation," the school must disclose to students that it is registered by the Commission and disclose Commission contact information for students who have questions or complaints about the school. The College discloses its Iowa registration and the Commission's contact information for the campus on its accreditation page at <http://www.hamiltontechcollege.edu/about.html>.

Financial Responsibility: Hamilton Technical College provided staff with an independent audit conducted by Blair, Westfall & Co., P.C., dated December 30, 2014. The auditing firm expressed its opinion that the corporation's financial statements presented fairly, in all material respects, the financial position of Hamilton Technical College, Ltd. as of December 30, 2014.

- A nonpublic 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 financially responsible without additional oversight. In its

independent audit conducted by Blair, Westfall & Co., P.C. the firm reported a composite score for the College of 2.3 for the year ending December 31, 2014. The highest score a school may receive is a 3.0.

- A for-profit school that participates in the federal student aid programs must demonstrate that no more than 90% of its revenue is derived from Title IV funding. In its independent audit conducted by Blair, Westfall & Co., P.C., Hamilton Technical College reports that the percentage of revenue derived from federal student aid was 85.04% for the year ending December 31, 2014.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Hamilton Technical College reports that the College compensates nine full time staff members for operational support other than teaching. The college employs nine full time faculty members, and two part time faculty members that provide classroom instruction.

Instructional Staff Qualifications: The College reported 11 faculty members which provide instruction in courses offered. Of those 11, nine are full-time faculty members, while two are part-time. Two of the nine instructors are nationally certified medical assistants. Both of these instructors teach non-degree courses at the College. One of these instructors has been with the College since 2003, and the other has six years' experience working in the field as a medical assistant. One of the nine instructors holds an associate level degree in electronics. This instructor has work towards a baccalaureate level degree, however; they have not completed it. Another of the nine instructors holds certificates in both basic and advanced electronics and has work toward a baccalaureate degree, however; they have not completed it. This instructor teaches associate level courses and has been with the College since 1999. One of the full time faculty members has numerous training and certifications and over 30 years' experience in field of study. This faculty member has been with the College since 1987 and teaches associate level courses. One faculty member is a certified coding specialist and has 10 years' experience in medical billing/ coding. This instructor teaches non-degree courses. Two of the nine instructors hold baccalaureate level degrees, one in electronics and the other in electronic engineering technology. One of these instructors teaches associate level courses, and the other teaches both associate and baccalaureate level courses. Both of these instructors have extensive professional experience with the College. One of the nine full time faculty members holds a Master of Fine Arts degree and is also the Academic Dean of the College. This instructor provides instruction in non-degree courses, associate level courses, and baccalaureate level courses.

Two of the 11 faculty members are reported as part-time faculty providing instruction in associate level courses. Both of these instructors hold master level degrees, one is a Master of Arts in Teaching and the other is Master of Arts in English. One of these instructors has 32 years' experience as an engineering technician.

Commitment to Iowa Students and Teach-Out: By executing her signature on the application, the Hamilton Technical College President, Maryanne Hamilton, commits to the delivery of programs in Iowa, and agrees to provide alternatives for students to complete programs at the campus or another school if Hamilton Technical College closes a program or the campus closes.

Compliance with Iowa Code Chapter 714

§ 714.18 – Evidence of Financial Responsibility

Hamilton Technical College has filed satisfactory evidence of financial responsibility under Iowa Code § 714.18, including a continuous corporate surety bond in the amount of \$50,000 payable to the State of Iowa and issued by Arthur J. Gallagher & Co, paid through October 13, 2016.

§ 714.23 – State Tuition Refund Policy

Hamilton Technical College maintains a compliant tuition refund policy for students who withdraw from its campus, and discloses that policy to students in its Academic Catalog, at http://www.hamiltontechcollege.edu/uploads/2/4/4/9/24498755/2015.2016_academic_catalog_08.11.2015.pdf and on its website at <http://www.hamiltontechcollege.edu/student-financial-services1.html>.

Compliance with Iowa Code Chapter 261F

Preferred Lender List: Hamilton Technical College does not appear to have a preferred lender list or a historical lender list. Students are directed to utilize federal financial aid. When a student is in need of private lending, he/she is directed to work with their individual banker(s) or internet banks.

Student Loan Code of Conduct: Students may review Hamilton Technical College's 261F compliant Student Loan Code of Conduct in the College's Student Consumer Information disclosures at:

- <http://www.hamiltontechcollege.edu/code-of-conduct-for-educational-loans.html>.
- <http://www.hamiltontechcollege.edu/uploads/2/4/4/9/24498755/20160815193014181.pdf>.