

IOWA COLLEGE STUDENT AID COMMISSION

Kaplan University Application for Voluntary Postsecondary Registration Renewal in Iowa April 8, 2016

STAFF ACTION:

Approve Kaplan University's voluntary application for postsecondary registration renewal in Iowa for a term that begins retroactively on November 17, 2014 and ends on November 17, 2016.

Registration Purpose

Kaplan University is currently eligible for an exemption from registration in Iowa under revised Iowa Code Section 261B.11, subsection 10 (i.e., the University meets the institutional eligibility requirements of participation in the Iowa Tuition Grant program). However, the University 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.

Kaplan University therefore requests and the Commission approves registration authorization only for Kaplan University's Iowa-based campuses and service centers and the online programs offered under KU and its two online program subdivisions, Open College and Concord Law School. Registration authorization under Iowa Code Chapter 261B is not necessary for Kaplan Professional and Continuing Education since it does not offer degree programs.

Institutional Information

Kaplan University is a for-profit institution with multiple physical campuses and student support service centers located in Iowa, as follows:

- 1801 East Kimberly Rd., Suite 1, Davenport Iowa (main campus)
- 7009 Nordic Dr., Cedar Falls Iowa
- 3165 Edgewood Parkway SW, Cedar Rapids, Iowa
- 4655 121st St., Urbandale, Iowa
- 2570 4th St. SW, Plaza West, Mason City, Iowa

The University also maintains campuses, student service centers, and administrative offices in the states of California (an administrative facility that supports Concord Law School), Florida, Illinois, Indiana, Maine, Maryland, Minnesota, Missouri, Nebraska, and Wisconsin. The University also maintains teaching locations on military bases at Fort Benning, Georgia, Fort Bliss, Texas, and Fort Irwin, California. The chief executive officer of Kaplan University is President Betty Vandenberg, 550 West Van Buren St., Suite 700, Chicago, IL. Kaplan University maintains a fictitious name registration with the Iowa Secretary of State's office under a foreign (Delaware), for-profit corporation registration #222144 for the Iowa College Acquisition Corporation. Its registered agent is CT Corporation System, 500 East Court Avenue, Des Moines, IA.

Kaplan University's designated Iowa contact person (including for complaints registered by a Kaplan University student who resides in any State) is Susan Spivey, President at both the Cedar Rapids and Cedar Falls campuses, 3165 Edgewood Pkwy SW, Cedar Rapids, IA.

Kaplan University shares an ultimate corporate parent, Kaplan, Inc., with other postsecondary educational institutions and nondegree-granting schools such as Kaplan Test Prep and Dev Bootcamp, and Kaplan International Colleges. From a corporate management perspective, Kaplan Higher & Professional Education (KHPE), headed by Chief Executive Officer Gregory Marino, provides fiscal and corporate support directly to Kaplan University. This ensures that Kaplan University's support mechanisms are focused entirely on Kaplan University's mission and students. Kaplan, Inc.'s other, non-HLC accredited institutions and schools operate under various other legal entities and reporting structures with an executive management and reporting structure that is entirely separate from Kaplan University. Kaplan University has no control or oversight responsibility over other Kaplan entities, and those entities have no control or oversight over any part of Kaplan University.

Kaplan University maintains a Board of Trustees that provides active oversight and governance of all University activities. Five of the trustees serve as public trustees, with no employment, contractual or financial interest in the University or its ultimate corporate parent, Kaplan, Inc. These five trustees have experience in educational technology, public and private academic leadership, accreditation, military leadership, business operations and leadership, and public policy. Two additional Kaplan Higher and Professional Education (KHPE) employees serve on the University's Board of Trustees, including KHPE Chief Executive Officer Gregory Marino and Lisa Gefen Sicilian, KHPE's Chief Administrative Officer. The University President Dr. Betty Vandenbosch also serves on the University's Board of Trustees as a non-voting member.

Physical Facilities: Each Kaplan University onsite program is taught in specially built classrooms and Kaplan provides special training facilities for certain programs, like criminal justice and allied health/nursing. Program-specific training facilities are discussed below. Each Kaplan campus includes a computer lab that utilizes high-speed Internet, LCD monitors, and Microsoft Office 2010. All computer rooms also have ceiling projectors and a whiteboard. Students are free to use the computer lab any time the campus is open, as long as they are not being used for classes. In addition, the Academic Success Center has computers for students use. There are also lounge facilities available to students. Facilities are partially accessible to persons with physical impairments.

Program-specific labs are available at certain Iowa campuses:

- All of the Iowa-based campuses house a Firearms Training Room. This room offers simulation of actual police interaction with the public, including flashing lights, the sound of firearms, verbal interactions with the public, and the verbal commands from the officer during training. The training room has a Firearm Training Simulator (FATS) machine with a 16' x 8' screen. There is a Glock 17 handgun simulator, an Oleoresin Capsicum (OC, also known as pepper spray) simulator, as well as a portable speaker system, a police rooftop flashers unit, and carbon dioxide tanks for the guns to provide life-like recoil. This lab provides students with realistic training scenarios that help students develop critical thinking skills, eyewitness identification, and on-demand verbal commands. Simulation scenarios escalate or de-escalate based on the student's performance. The room is capable of training up to 15 people at a time.

- The Des Moines, Cedar Falls, Cedar Rapids, Mason City, and Davenport campuses offer medical labs that provide students with hands-on experience in clinical procedures commonly performed in medical offices. Equipment includes exam tables, microscopes, an autoclave, centrifuge(s), venipuncture equipment, injection supplies, EKG machines, and other medical laboratory equipment and supplies.
- At the Des Moines, Cedar Falls, and Cedar Rapids campuses, a nursing program lab consists of birthing simulators, mannequins, high- and low-fidelity simulators, oxygen machines, injection pads, the same nursing equipment and beds found in a hospital or clinic and audio-visual systems to assist students in the development and testing of skills

Kaplan provides instructional and administrative office space at each Iowa campus as follows:

- Davenport, Iowa: 35,100 square feet
- Cedar Falls, Iowa: 30,000 square feet
- Cedar Rapids, Iowa: 20,000 square feet
- Des Moines, Iowa: 38,000 square feet
- Mason City, Iowa: 30,000 square feet

Multiple Commission staff has visited the Kaplan University campuses across the state at the invitation of the University to provide training or information about Commission initiatives and student services. Kaplan maintains sites in Iowa that are modern, clean, provide ample parking, and are sufficiently spacious to accommodate administrative staff, student support services, and student instruction.

Accreditation: Kaplan University is accredited by the Higher Learning Commission (HLC), a regional accrediting agency recognized by the federal Department of Education. This accreditation includes programs offered by the Concord Law School.

Federal Stafford Loan Cohort Default Rate (FFY 2010): 12.9% (institution-wide). For comparison purposes, the FFY 2010 national average cohort default rate is 11.8%.

Graduation Rate: The graduation rate 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. Kaplan University reports the following, graduation rates for students who began their enrollment at the Iowa-based campuses and in online programs in award year 2008-2009:

- Davenport campus: 21% (includes online program students)
- Cedar Falls campus: 42%
- Cedar Rapids campus: 29%
- Urbandale (Des Moines) campus: 26%
- Mason City campus: 32%

Average Loan Debt upon Graduation:

Iowa Campus-Based Programs – these figures represent *average* loan debt and were provided by the University on its registration application:

- Cedar Falls campus

- ✓ Associate Degree graduates: \$17,296.10
- ✓ Baccalaureate Degree graduates: \$23,216.38
- Davenport campus (includes online program graduates?)
 - ✓ Associate Degree graduates: \$16,811.97
 - ✓ Baccalaureate Degree graduates: \$8,689.88
- Cedar Rapids campus
 - ✓ Associate Degree graduates: \$15,925.33
 - ✓ Baccalaureate Degree graduates: \$12,148.72
- Urbandale (Des Moines) campus
 - ✓ Associate Degree graduates: \$15,900.92
 - ✓ Baccalaureate Degree graduates: \$15,464.55
- Mason City campus
 - ✓ Associate Degree graduates: \$14,296.40
 - ✓ Baccalaureate Degree graduates: \$3,359.74

Online Programs – the figures below represent *median* loan debt of specific online program graduates during the 2014-2015 award year, and were obtained from the University’s web-based Gainful Employment disclosures. The University anticipates that median loan debt will decrease going forward for students enrolled in nine programs that are eligible for the Kaplan Tuition Cap. For more information, see the subheading *Programs* below.

Business and Information Technology

- Master of Science in Accounting: \$48,541
- Master of Science in Management: \$51,783
- Master of Business Administration: \$55,918
- Master of Science in Finance: \$46,517
- Graduate Certificates in Accounting, Human Resources, and Project Management: These programs are not eligible for federal student aid and therefore the University is not required to provide Gainful Employment disclosures.
- Human Resources Post-baccalaureate Certificate: These programs are not eligible for federal student aid and therefore the University is not required to provide Gainful Employment disclosures.
- Bachelor of Science in Accounting: \$30,588
- Bachelor of Science in Business Administration: \$30,925
- Bachelor of Science in Finance: data is unavailable; fewer than 10 students completed this program during the most recent reporting period.
- Associate of Applied Science in Accounting: \$16,166
- Associate of Applied Science in Business Administration: \$27,743

Criminal Justice

- Master of Science in Criminal Justice: \$48,028
- Master of Science in Homeland Security and Emergency Management: \$43,875
- Bachelor of Science in Criminal Justice: \$29,273
- Bachelor of Science in Corrections: data is unavailable; as of the date of this report, this program was only recently launched in September of 2015.
- Associate of Applied Science in Criminal Justice and Criminology: data is unavailable; as of the date of this report, this program was only recently launched in September of 2015.

- Certificates in Corrections; Crime Scene Technician; Private Security; Management and Supervision: data is unavailable; fewer than 10 students completed this program during the most recent reporting period.

Education

- Master of Science in Education (for existing teachers): \$38,610
- Master of Arts in Teaching Noncertification (nonlicensure program for students residing outside of Iowa): data is unavailable; fewer than 10 students completed this program during the most recent reporting period.
- Master of Science in Instructional Design and Technology: data is unavailable; fewer than 10 students completed this program during the most recent reporting period.
- Master of Science in Higher Education: \$39,005
- Master of Arts in Teaching – Iowa Certification: data is unavailable; fewer than 10 students completed this program during the most recent reporting period.
- Master of Science in Educational Psychology: \$48,136
- Bachelor of Science in Early Childhood Administration: data is unavailable; as of the date of this report, this program was only recently launched in September of 2015.

Fire Science

- Bachelor of Science in Fire Science: \$0. The University explains that of 19 program completers, 10 had no loans because they were either self-paying or their program costs were paid. Thus, a median loan debt would produce a result of \$0. The other nine students that received federal student aid averaged about \$13,000 in loan debt.
- Bachelor of Science in Fire and Emergency Management: \$25,775
- Associate of Applied Science in Fire Science: data is unavailable; fewer than 10 students completed this program during the most recent reporting period.

Health Sciences (Nursing programs are listed separately, below):

- Master of Health Care Administration: \$46,801
- Master of Public Health: \$49,106
- Master of Science in Health Education: \$43,729
- Master of Health Informatics: data is unavailable; fewer than 10 students completed this program during the most recent reporting period.
- Master of Health Information Management: data is unavailable; fewer than 10 students completed this program during the most recent reporting period.
- Bachelor of Science in Health Care Administration: \$32,995
- Bachelor of Science in Health Information Management: \$71,550
- Bachelor of Science in Nutrition Science: \$32,998
- Bachelor of Science in Health and Wellness: \$28,862
- Bachelor of Science in Health Science: \$28,864
- Medical Office Administration: data is unavailable; as of the date of this report, this program was only recently launched in September of 2015.
- Medical Billing Coding Certificate: \$12,275
- Medical Assistant Certificate: data is unavailable; fewer than 10 students completed this program during the most recent reporting period.

Law and Legal Studies:

- Juris Doctor: \$48,678

- Executive Juris Doctor: \$40,447
- Master of Science in Legal Studies: \$57,084
- Master of Science in Environmental Policy: \$48,838
- Bachelor of Science in Legal Studies: \$32,588
- Bachelor of Science in Environmental Policy and Management: \$42,658
- Associate of Applied Science in Public Safety and Security: data is unavailable; fewer than 10 students completed this program during the most recent reporting period.
- Associate of Applied Science in Legal Support and Services: data is unavailable; as of the date of this report, this program was only recently launched in September of 2015.

Nursing

- Doctor of Nursing Practice: data is unavailable; fewer than 10 students completed this program during the most recent reporting period.
- Post-Master's Certificate, Nurse Educator; Adult-Gerontology Nurse Practitioner; Executive Leader: data is unavailable; fewer than 10 students completed this program during the most recent reporting period.
- Post-Master's Certificate, Family Nurse Practitioner: \$0 median loan debt; \$3,104 institutional financing plan
- Master of Science in Nursing:
 - ✓ Adult Gerontology: \$64,607
 - ✓ Executive Leader: \$36,270
 - ✓ Family Nurse Practitioner: \$64,710
 - ✓ Informatics: \$45,386
 - ✓ Nurse Educator: \$47,319
- Master of Science in Nursing – DNP Path (for students with a baccalaureate degree who desire to move on to a Doctor of Nursing Practice): data is unavailable; fewer than 10 students completed this program during the most recent reporting period.
- Bachelor of Science in Nursing: \$24,754
- Associate of Science in Nursing – Iowa and Nebraska only (hybrid): \$32,917

Open College

- Bachelor of Science in Professional Studies: This program is not eligible for federal student aid and therefore the University is not required to provide Gainful Employment disclosures.

Social and Behavioral Sciences

- Master of Public Administration: \$47,970
- Master of Science in Psychology: \$52,831
- Master of Science in Educational Psychology: \$48,136
- Master of Science in Human Services: data is unavailable; as of the date of this report, this program was only recently launched in July of 2015.
- Graduate Certificates in Addictions; Industrial/Organizational Psychology: These programs are not eligible for federal student aid and therefore the University is not required to provide Gainful Employment disclosures.
- Post-baccalaureate Certificates in Applied Behavior Analysis; Autism Spectrum Disorders: These programs are not eligible for federal student aid and therefore the University is not required to provide Gainful Employment disclosures.
- Bachelor of Science in Communication: \$34,799
- Bachelor of Science in Liberal Studies: \$14,861

- Bachelor of Science in Human Services: \$31,107
- Bachelor of Science in Psychology in Addictions: data is unavailable; as of the date of this report, this program was only recently launched in September of 2015.
- Bachelor of Science in Psychology in Applied Behavior Analysis: data is unavailable; as of the date of this report, this program was only recently launched in September of 2015.
- Bachelor of Science in Psychology in Industrial/Organizational Psychology: data is unavailable; as of the date of this report, this program was only recently launched in September of 2015.
- Human Services Certificate in Child and Family Services; Elder Care Services: data is unavailable; as of the date of this report, this program was only recently launched in July of 2015.

Technology:

- Master of Science in Information Technology: \$47,979
- Master of Science in Cybersecurity Management: data is unavailable; as of the date of this report, this program was only recently launched in July of 2015.
- Bachelor of Science in Information Technology: \$30,928
- Bachelor of Science in Cybersecurity: data is unavailable; as of the date of this report, this program was only recently launched in July of 2015.
- Associate of Applied Science in Information Technology: \$28,047
- Graduate Certificate in Information Security: This program is not eligible for federal student aid and therefore the University is not required to provide Gainful Employment disclosures.
- Post-baccalaureate Certificates in Cisco Networks; Computer Forensics; Information Security; Microsoft Operating Systems; Multiplatform Software; Oracle Database Administration: These programs are not eligible for federal student aid and therefore the University is not required to provide Gainful Employment disclosures.

Record Preservation: Kaplan University ensures the security of student records by:

- Restricting access to electronic student information to only staff that need it in order to perform job functions and by employing strong password protection on all hardware and software. Access to systems and databases and the permission levels allowed therein are carefully assessed before such provisioning is granted. We conduct a regularly-scheduled review of all personnel permission settings.
- Securing physical files in locked cabinets and/or rooms and limiting access to authorized personnel only.
- Limiting the display of social security numbers to staff that need that data to perform job functions and restricting it from appearing on reports, printing, or otherwise compromising its security.
- Ensuring that work space access is limited to authorized persons.
- Placing controls on what kind of information can be saved to a drive or printed.
- Requiring students to clearly identify themselves for identification purposes before releasing non-directory information.
- Managing closely a third-party authorization process whereby students can designate another person as someone to whom we can release non-directory information, and the type of information which can be released to that person.
- Maintaining a document retention schedule and process, for the timely destruction of such records-determined to no longer be required or needed.
- Managing compliance to FERPA by means of training and resources.

- Using security paper when printing student transcripts and a secure third-party vendor for provisioning electronic transcripts.
- Employing a dedicated information security team to guard against external threats to University systems.
- Storing electronic data on secure servers, which are backed up regularly and maintained redundantly in geographically diverse locations.

Transcript Requests:

- Online Programs: Mike Lorenz, University Registrar, 550 W. Van Buren, 7th FL, Chicago, IL 60607; (866) 522-7747; mlorenz@kaplan.edu
- Davenport Campus: Janet Gehris, Campus Registrar, 1801 East Kimberly Rd., Suite 1, Davenport IA 52807; (563) 355-3500
- Cedar Falls Campus: Jessica Wittenburg, Campus Registrar, 7009 Nordic Dr., Cedar Falls, IA 50613; (319) 277-0220
- Cedar Rapids Campus: Stephanie Brecht, Campus Registrar, 3165 Edgewood Parkway SW, Cedar Rapids IA 52404; (319) 363-0481
- Urbandale (Des Moines) Campus: Christian Kinkenber, Campus Registrar, 4655 121st St., Urbandale, IA 50323 (515) 727-2100
- Mason City Campus: Pattie Eden, Campus Registrar, Plaza West, 2570 4th St. SW, Mason City, IA 50401; (641) 423-2530

Official transcripts may also be ordered through the “Transcripts” link in the Registrar and Credits page of the University’s online student portal, KU Campus.

Instructional Methodology: Kaplan University offers students educational programs via classroom instruction and distance education. However, not all Kaplan University programs are available via in-person instruction, and not all programs offered via in-person instruction are available at all Kaplan campuses. Kaplan web pages that are devoted to the University’s campuses and programs, and its Catalog, provide information about which programs Kaplan offers with only online delivery and which programs are offered with a classroom-based component at specific Kaplan campuses. Even in a program that is offered via a face-to-face component, some portion of the program and some components of an individual course may be offered via online delivery. Kaplan assures staff that a student enrolled in a program that offers courses with a classroom-based, face-to-face component has the opportunity to take those courses in that delivery mode. Through the campus advising process, students are made aware of the delivery option for courses in their program.

Students enrolled in Kaplan University, regardless of delivery mode, use the University’s online virtual platform, which is located on the internet at www.kucampus.kaplan.edu. It is supported by a large farm of Web servers configured redundantly to generally assure uninterrupted, around-the-clock operation. Kaplan University’s students have access to the Kaplan University Advanced Classroom Environment, a unique, high-performance, multi-user data management system.

Several modes of asynchronous interaction are available through the virtual classroom used in online course delivery. Threaded discussion forums are prompted by faculty using the virtual classroom Discussion Board. In addition, the online classroom provides for interactive activities such as text-based discussion, quizzes, and readings, and an integrated email system that can be used for student-to-student messages or faculty-to-student correspondence. The classroom also provides an assignment function that allows students to identify all required course assignments

and any updated postings when they log into class. Virtual office hours allow students to communicate directly with instructors.

In some programs, online faculty members hold live Seminar sessions online to discuss pertinent course content, case studies, and/or assignments. Students are expected to attend a scheduled Seminar session each week. These Seminars create valuable opportunities for students to exchange opinions, share relevant work experiences, and further their understanding of the curriculum.

Student Learning Resources: **Again, this is a compilation of what you gave me in 2012 and 2014 that is most comprehensive. Please check.**

A resource shared by all online and campus students is the Kaplan University Online Library <http://library.kaplan.edu>, which facilitates access to over two dozen databases, over 200,000 e-books, and a robust collection of thousands of scholarly journals, magazines, newspapers, and other periodicals. In addition to the electronic collections, services for students include article document delivery, subject and course-specific research guides, and reference assistance. Reference assistance for students is staffed by professional librarians and trained support staff, and is available via e-mail, toll-free telephone, or real-time chat during posted hours.

Students who need extra assistance because of academic difficulties may inquire about available tutoring services through their Academic Advisor (online), the Academic Success Center (onsite), or the Academic Dean (Learning Center). Through a link on the University's online student portal, KU Campus, students may access free, individualized, interactive online tutoring sessions from the Academic Support Center. In addition, highly trained, dedicated tutors offer course-specific and generalized academic learning assistance through the Writing, Math, Science, Business and Technology Centers.

Kaplan University also provides a Career Services Center <http://www.kaplanuniversity.edu/academic-support/career-services.aspx>, which is accessible to students on the "CareerNetwork" page through the University's online student portal, KU Campus. A student may also email careerservices@kaplan.edu for additional information. Career Services offers dedicated staff who assist students with career assessment, occupational direction, resume/cover letter review, interview preparation, mock interviews, career networking tips, assistance in building an online presence for a job search, and online career fairs.

Curriculum Evaluation and Development: The Kaplan University School Review Teams (SRTs) are responsible for the review of and decisions regarding curricular programs and courses in their respective schools. The SRT includes representatives of various University departments: marketing, finance, military, admissions, accreditation, the assistant dean of curriculum for that department, and three to five faculty members from the specific program. In addition, SRTs use internal and external subject matter experts. The SRTs will:

- Approve new certificates, certification programs, associate's degree, bachelor's degree, and graduate programs and/or changes to existing programs. SRTs may approve the following program-related items, which should also be included in the New or Revised Program Proposal template:
 - ✓ Rationale for adding the program, with a brief discussion of the relationship to Kaplan University's mission, brief marketing feasibility, and target audience/competitive analysis

- ✓ Program outcomes
 - ✓ Degree plan including number of credits (core, major, and electives), general education requirements, and general education literacy (GEL) distribution
 - ✓ Admission and progression requirements
- Approve new courses and/or changes to existing courses. The Committee may approve the following course-related items:
 - ✓ Rationale for adding or changing course
 - ✓ Course title
 - ✓ Course number (as approved by the Registrar's Office)
 - ✓ Credit hours
 - ✓ Prerequisites
 - ✓ Course description
 - ✓ Course outcomes
 - ✓ Course outline
 - ✓ Course type, i.e., required or elective; and how the course fits into the degree plan.

The SRTs send recommendations for undergraduate and graduate curriculum and program changes to the Faculty Curriculum Committee for final approval. The Faculty Curriculum Committee also reviews the University's general education curriculum requirements and proposals for modifications.

The Faculty Curriculum Committee generally approves requested additions and/or changes if the SRT recommendation is submitted with the endorsement of the faculty within the program in which it is to be offered and if the following conditions are met:

- The request is harmonious with and/or supportive of the University Mission Statement.
- The request clearly fulfills a need that cannot be met by existing course(s) or programs.
- The request meets general University requirements.
- The request is appropriate to the function of the University.
- The request does not duplicate a course or program offered by another program in the University.

Student Complaints Process: The University's Catalog, which is listed on its Student Consumer Information page at <http://www.kaplanuniversity.edu/student-consumer-information.aspx>, outlines the University's general problem resolution and grievance procedures for students enrolled in online programs and for students who enroll in campus-based programs.

Online Program Students

- Step 1: Discuss your issue with the appropriate instructor, staff member, or administrative manager.
- Step 2: If you are not satisfied with outcome of the discussion, you can request your complaint be filed with an ombudsperson, dean, or designated resolution person.
- Step 3: If you remain unsatisfied or the complaint remains unresolved, you can file a grievance with the University's Student Relations Department. Grievance forms may be obtained from an ombudsperson, dean, or designated resolution person and emailed to the Student Relations Department at studentrelations@kaplan.edu.

Student Relations will serve as an impartial representative of Kaplan University that is not directly involved in the issues of the complaint. A Student Relations representative will investigate the complaint and assist in the response to the complainant. Student Relations will make every effort to complete investigations and provide responses to the complainant within five business days of the date it receives and assigns the complaint, or Student Relations will contact the complainant to report the status of the investigation.

Campus-Based (Onsite) Program Students

- Step 1: Communicate with the appropriate instructor, staff member, or administrative manager.
- Step 2: Communicate with the Program Coordinator/Department Chair.
- Step 3: Communicate with the Campus Academic Dean.
- Step 4: Unresolved concerns may be brought to the attention of the University's Student Relations Department by filing a grievance. The process from this point is the same as for online students, as described above.

State Agency Appeal: If a student's complaint cannot be resolved after exhausting the University's grievance procedure, the student may file a complaint with the state postsecondary education oversight agency in the state in which the student resides. Kaplan University provides contact information on its Student Consumer Information website for state postsecondary education agencies.

The Iowa College Student Aid Commission (the Commission) accepts complaints from any Kaplan University student attending an Iowa-based campus, and from any student attending Kaplan University's online programs or courses (including Concord Law School, Open College, and Kaplan Professional and Continuing Education) who resides in any state in the United States.

Kaplan University will maintain records of all complaints and their resolutions for a period of no less than 3 years.

Programs Offered

Online Programs

Please see the separate list of online programs. This list includes estimates of total institutional charges over the course of the program. Book charges are included in the cost of tuition. All students are charged an additional technology fee of \$295 per quarter term.

Iowa Campus-Based Programs

The following programs are offered in a blended format (a combination of face-to-face and online instructional modalities) at the University's Iowa-based campuses.

- Medical Assistant Certificate: \$22,413
- Medical Billing and Coding Certificate: \$15,372
- Medical Office Administration Certificate: \$22,413
- Pathway to Paralegal Certificate: \$14,952
- Phlebotomist Certificate: \$13,254 (Note: the University is not accepting new enrollments in this program; the University is teaching out currently enrolled students).

- Associate of Applied Science in Accounting: \$30,699
- Associate of Applied Science in Business Administration: \$22,500* - \$30,699
- Associate of Applied Science in Criminal Justice and Criminology: \$22,500* - \$30,699
- Associate of Applied Science in Information Technology: \$30,699
- Associate of Applied Science in Legal Support and Services: \$22,500* - \$30,699
- Associate of Science in Nursing: \$38,108. Note that this program is available in a campus-based format only at the Iowa campuses in Cedar Falls, Cedar Rapids, and Des Moines.
- Associate of Applied Science in Public Safety and Security: \$22,250* - \$30,699
- Bachelor of Science in Accounting: \$66,642
- Bachelor of Science in Business Administration: \$45,000* - \$66,462
- Bachelor of Science in Communication: \$66,462
- Bachelor of Science in Criminal Justice: \$66,462
- Bachelor of Science in Early Childhood Administration: \$45,000* - \$66,462. Note: This program is available in a campus-based format only at the Iowa campuses in Davenport, Des Moines, and Mason City.
- Bachelor of Science in Health Care Administration: \$66,462
- Bachelor of Science in Human Services: \$66,462
- Bachelor of Science in Information Technology: \$66,462
- Bachelor of Science in Legal Studies: \$66,462
- Bachelor of Science in Psychology in Addictions: \$45,000* - \$66,462
- Bachelor of Science in Psychology in Applied Behavior Analysis: \$45,000* - \$66,462
- Bachelor of Science in Psychology in Industrial/Organizational Psychology: \$45,000 - \$66,462

*Tuition Cap Programs: The Kaplan University Tuition Cap is available to first-time Kaplan University enrollees in predetermined programs. For online and on-campus programs that are eligible for the Tuition Cap, students are charged a total maximum cost of completion of \$22,500 for an associate's degree, or a total maximum of \$45,000 for a bachelor's degree. With the exception of any applicable background check and/or lab fees, students will not be charged for completing the program after the student has reached the total cost of program completion, even if the student must retake a course. The student must maintain enrollment in a Tuition Cap program in order for the student to continue to qualify for the cap. A student that transfers into a non-capped program is no longer eligible for the Tuition Cap. For students with prior credits earned at another institution, the University adjusts the Tuition Cap downward based on the number of credits a student successfully transfers into the University's program. Military servicemembers and veterans are not eligible for the Tuition Cap since these individuals qualify for military or veteran's educational benefits that exceed the Tuition Cap discount.

Kaplan University holds the following approvals for programs that prepare students for licensed professions in Iowa:

- The Iowa Board of Nursing for an Associate of Science in Nursing (that prepares students for initial licensure as a Registered Nurse); a Bachelor of Science in Nursing (RN to BSN); a Master of Science in Nursing (MSN) in five tracks - Adult/Gerontological Nurse Practitioner, Family Nurse Practitioner, Executive Leader, Nurse Educator, and Informatics; Adult Nurse Practitioner and Family Nurse Practitioner; a Post-Master's Certificate program; and a Doctor of Nursing Practice (DNP) in five tracks – MSN to DNP; BSN to DNP, Adult Gerontology Nurse Practitioner; Family Nurse Practitioner, and Executive Leader.

- The Iowa Board of Education for a Master of Arts in Teaching program that prepares students for licensed employment in Iowa as a secondary school teacher.

Field Experiences:

The following Kaplan University programs contain a field experience (i.e., practicum) component:

- Certificate in Medical Assisting
- Certificate in Medical Billing and Coding
- Certificate in Medical Office Administration
- Associate of Applied Science (AAS) in Health Information Technology (as of the date of this report, the University is not accepting new enrollments in this program)
- Associate of Science in Nursing
- Bachelor of Science in Health Information
- Master of Arts in Teaching – Iowa licensure track
- Master of Science in Higher Education – Student Affairs specialization
- Master of Science in Public Health
- Master of Science in Psychology (Addictions)
- Master of Science in Psychology (Applied Behavior Analysis)
- Master of Science in Psychology (Industrial/Organizational Psychology)
- Graduate Certificate in Addictions
- Graduate Certificate in Industrial/Organizational Psychology
- Post-Graduate Certificate in Applied Behavior Analysis
- Master of Science in Nursing – DNP Path
- Post-Master’s Certificate in Adult Gerontology Nurse Practitioner
- Post-Master’s Certificate in Family Nurse Practitioner
- Post-Master’s Certificate in (Nursing) Executive Leader
- Post-Master’s Certificate in Nurse Educator
- Executive Juris Doctor

The University generally described the common expectations of the student, faculty, and supervisor in all practicum courses:

- Student – Kaplan University maintains a practicum site placement team that locates appropriate placement sites for undergraduate students. Graduate students work with the placement team to identify an appropriate practicum site. Once an appropriate site is identified, the student submits an affiliation agreement to the Practicum Coordinator that has been signed by the student and the preceptor at the practicum site. In all practicum programs, the student must complete additional coursework which can take the form of a journal, participation in discussion boards with other students and the course instructor, submission of a paper for the instructor’s review, and submission of timesheets to verify hours engaged in activity at the field experience site.
- Faculty – Faculty members are responsible for ensuring that the student has located an appropriate practicum site and is meeting the agreed upon goals. The practicum course instructor monitors the student’s progress by requiring the student to keep a journal and participate in discussion boards with other students and the course instructor. Course

instructors also check in with site supervisors and review the student's timesheets to ensure the student and the preceptor are having a successful experience.

- Site Supervisor – The site supervisor works with the student to develop mutually agreed upon, measureable goals that pertain to the student's career focus. The supervisor monitors the student's progress toward these goals. Site supervisors are expected to help students set their weekly hours and provide regularly scheduled meetings and feedback regarding the student's performance. The site supervisor signs all timesheets. At the end of the practicum experience, the site supervisor provides a written evaluation of the student. Approximately half of the student's practicum course grade is based on the grade that the internship supervisor gives to the student; the other one-half is based on the student's work in the classroom portion of the course.

The University also submitted detailed excerpts from its various practicum handbooks, syllabi, and internship agreements, which substantiate the very structured, outcome-driven nature of the field experiences in various Kaplan programs.

Registration Compliance

As required by Iowa Code Section 261B.4, Kaplan University discloses its policies for refunding tuition charges to withdrawn students. The University's policy complies with Iowa Code Section 714.23, and is more generous to withdrawn students than Iowa Code requires. The University discloses the Iowa tuition refund policy on its Kaplan University and Concord Law School enrollment agreements, and in its Catalog <http://catalog.kaplanuniversity.edu/>, which includes information for Concord Law School students.

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. These requirements duplicate policies and disclosures required by the federal Department of Education for a school that participates in the federal student aid programs. The University maintains these policies and discloses them in Clery Act security and crime awareness reports at <http://www.kaplanuniversity.edu/student-consumer-information.aspx>. Information for online program students is available through the Davenport, Iowa campus report. The University coordinates its online programs through the Davenport campus.
- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy concerning 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. Kaplan University has adopted a University-wide policy that complies with this provision of Iowa Code and discloses the policy to students on the University's Military

website at <http://www.kaplanuniversity.edu/military/military-faq.aspx>. During the registration renewal evaluation process, the University expanded its disclosure of this policy in its Catalog <http://www.kaplanuniversity.edu/documents/catalog.pdf>, which includes information specific to students enrolled in Concord Law School.

- Iowa Senate File 2225 created a new Iowa Code Section 261.9(1)(h). This law, generally effective July 1, 2012, 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), subsection 7], this policy applies to Iowa's registered schools. Kaplan University has a policy in place for Iowa-based employees that complies with this requirement and disclosed a copy of the policy as an addendum to its registration application. The University discloses the policy to newly hired employees as part of its new employee orientation packet.

Student Consumer Information: In its registration application, Kaplan University indicates that the disclosure requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8), are not applicable. 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. Despite the University's application response, the University provides these disclosures to students in the University's catalog <http://www.kaplanuniversity.edu/documents/catalog.pdf>, in a variety of locations on its website including on individual program pages, on its website, and in its enrollment agreement.

The University affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7. Effective July 1, 2012, these provisions of Iowa Code were modified to 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 provide Commission contact information for students who have questions or complaints about the school. The University provides information for the Commission on a state agency contact page in its catalog <http://www.kaplanuniversity.edu/documents/catalog.pdf> and in a *Grievance Process, State Agencies Contact List* on its Student Consumer Information webpage at <http://www.kaplanuniversity.edu/student-consumer-information.aspx>.

Financial Responsibility: Kaplan University submitted an independent financial audit report by PricewaterhouseCoopers LLP, dated June 24, 2014, for its parent company, the Kaplan Higher Education LLC (KHE) and Subsidiaries (including Kaplan University), for the fiscal year ending December 31, 2014. The auditing firm stated its opinion that KHE's consolidated financial statements present fairly, in all material respects, the consolidated financial position of KHE and its subsidiaries, and the results of their operations and cash flows, in accordance with accounting principles general accepted in the United States.

The auditors provided additional commentary on appendices to KHE's consolidated financial statements that contained a condensed balance sheet and condensed statement of operations for Kaplan University, as required by the Higher Learning Commission. The auditors state that such information is not intended to be a complete presentation of the financial position and result of operations of Kaplan University. Thus, this information was not subjected to stand-alone audit procedures performed in conjunction with the audited of the KHE consolidated financial statements. However, the information was subjected to the auditing procedures applied in the audit of the basic

consolidated financial statements, and in the auditors' opinion, is fairly stated, in all material respects, in relation to the KHE consolidated financial statements as a whole.

- Financial Responsibility Composite Score - A private for-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 financially responsible without additional oversight. The University's most recent composite score verified by the federal Department of Education is **2.8** (out of a possible 3.0) for the institutional fiscal year ending December 31, 2014:
- 90/10 Ratio: A private for-profit school that participates in the federal student aid programs must not derive more than 90% of its revenue from federal student aid sources during any institutional fiscal year. The aforementioned independent audit reports that KHE received approximately **80.5%** of its cash receipts from the federal student aid programs.

Full-Time Iowa Resident Faculty Member or Program Coordinator. Kaplan University has 34 Iowa-based, full-time faculty, and 83 part-time, Iowa-based faculty. The University reports a total of 260 full-time and 2830 part-time faculty who provide instruction in programs offered to Iowa residents (regardless of the faculty member's location).

Instructional/Supervisory Staff Qualifications:

Kaplan University submitted an alphabetic listing of 65 full- and part-time faculty and instructors in its Iowa campus-based programs that provides each faculty member's highest earned degree and educational area of emphasis, and the courses for which each faculty member provides instruction. Of these faculty members, five hold a doctoral degree in medicine, sociology, or geosciences; 47 hold a master's degree, and the remaining 13 have a baccalaureate degree. Of those holding a baccalaureate degree, staff observe that their education is in the health sciences (in the majority, nursing) and that their instructional assignments are predominantly in lower-level, baccalaureate degree courses in the health sciences.

The University also submitted an alphabetic listing of over 3000 full- and part-time faculty who provide instruction in its online courses. This list includes highest degree attained and the associated educational area of emphasis. Each page in this list included approximately 12 to 16 faculty members. The vast majority of this list includes at least one full-time faculty member on each page. Nearly all of these faculty members hold a master's degree and many possess a doctoral degree in areas such as law, education, criminal justice, public health, health or social sciences, information technology, and business. This list includes a very small number of faculty with only a baccalaureate degree in a specialized vocational areas such as nursing, health sciences, or criminal justice.

Staff sampled job descriptions for open, remote/virtual (online) faculty positions advertised on the University's Careers site. With one exception, all sampled adjunct faculty positions required at least a master's degree and professional experience. The single exception related to an adjunct faculty opening in the medical assisting undergraduate certificate program, for which the University required the applicant to possess a bachelor's degree in a health sciences field. Job descriptions that staff sampled for graduate program faculty in the behavioral sciences programs demanded that the applicant have a conferred doctoral degree in the subject matter to be taught. In some cases, for highly specialized teaching assignments (e.g., in nursing, software development, or behavioral

sciences), the University's minimum qualifications also included professional licensure or certification.

Staff also sampled faculty profiles posted on the University's website for health sciences and information technology programs. Of 24 health sciences faculty reviewed, 17 had a doctoral degree in health care administration, nutrition, health education, nursing, medicine, or law. The remaining faculty members had at least one master's degree. Experience and expertise among the health sciences faculty members focused on health care administration in various settings, health policy, and health education. Of 17 information technology faculty reviewed, all had at least a master's degree and eight had a doctoral degree or were pursuing doctoral studies. Expertise among the information technology faculty includes topics such as application development methodologies, IT architecture and design, network security, educational technology, instructional design, programming, and law.

Commitment to Iowa Students and Teach-Out: By executing his signature on the application, the University's Vice President for State Affairs and Associate General Counsel John P. Carreon committed to the delivery of programs the University offers in Iowa and agreed to provide alternatives for student to complete their programs at the same or other institutions if the University closes a program before students have completed their course of study.

Student Complaints

During the most recent calendar year (2015), the Commission received a total of 11 complaints from Kaplan University students. Four of the eleven complainants were enrolled in a program through a University campus located in Iowa. Seven of the complainants were enrolled in online programs and resided in states other than Iowa. Complaints received from Kaplan University students during 2015 constituted approximately 10% of the total number of complaint cases (110) that the Commission received during 2015.

Of the 11 complaints received from Kaplan University students in 2015, staff concluded that eight were either unfounded or otherwise without merit. These complaints generally resulted from a student's inattention to federal student aid eligibility or loan repayment obligations, a student's failure to note disclosed program charges, or in one case, a student's attempt to defraud the federal student loan program.

In two cases, Commission staff reached no conclusion that Kaplan University had engaged in questionable conduct, committed an error, or even provided poor customer service, but the University nevertheless offered to resolve the complaint in favor of the student. In one case, the University offered to conduct a second review of a student's previously denied petition to obtain course credit for life experience. In another case, a student claimed she had been enrolled in an associate degree program instead of a diploma program. Based on multiple sources of documentation and disclosures the University provided, the student's claim could not be substantiated. However, the University offered to allow the student to retake, without charge, the final course in her diploma program which she had previously failed, graduate her with a diploma, and forgive tuition charges for the courses she took that were attributable only to the associate degree program.

In the final case, a student claimed that a University staff person ignored her notification about a disabling condition and did not cooperate with her request for an approved leave of absence to coincide with her husband's military duty reassignment. The University offered the student the

opportunity to appeal for readmission, initiated its processes for students who request reasonable disability accommodations, and forgave outstanding tuition charges resulting from her withdrawal.

The University provides a single, Iowa-based, student complaint resource who takes an active role in facilitating resolution on all student complaints regardless of the student's state of residence. This resource is easily accessible by phone and email, prompt, objective, and thorough in her responses to student complaints.

Generally, staff finds that Kaplan University is interested in preserving a positive and communicative relationship with the Commission. The University is consistently attentive and diligently responsive to staff questions, concerns, and recommendations. In particular, staff acknowledges the University's Cedar Falls and Cedar Rapids campus President, its state/accrediting agency compliance staff, and General Counsel as key participants in maintaining staff's confidence in the University's good faith efforts.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Kaplan University filed sufficient evidence of financial responsibility under Iowa Code Chapter 714.18. This evidence includes a continuous, corporate surety bond payable to the State of Iowa in the requisite amount of \$50,000, issued by Holman and Company.

Section 714.23 – State Tuition Refund Policy

Iowa Code Section 714.23 requires Kaplan University, as a for-profit institution to offer a student who withdraws from the school's program a minimum refund or reduction of tuition charges. Kaplan University adopted a policy that exceeds the minimum tuition refund formula in Iowa Code Section 714.23 for its Iowa-resident online students, and for students that attend its Iowa campuses. This policy is disclosed in applicable enrollment agreements and in the University's Catalog, including for students attending Concord Law School.

Compliance with Iowa Code Chapter 261F

During the registration renewal evaluation process, Kaplan University updated its institution-wide Educational Loan Code of Conduct to comply with the provisions of Iowa Code Chapter 261F. This Iowa law governs the business relationships of private education loan lenders and school employees who have education loan related responsibilities. Iowa Code Chapter 261F also mandates that a school provide certain student consumer information disclosures in cases when a school maintains a preferred lender list. Staff found no evidence that the University maintains a preferred education loan lender list or that it otherwise refers students to specific private education loan lenders.

Additional Information – Federal Student Aid Eligibility:

Kaplan University is currently on a provisional certification to participate in the federal student aid programs that is valid until September 30, 2018. Information obtained directly from the federal Department of Education's Multi-Regional School Group indicates that the University was due for renewal of its certification to participate in the federal student aid programs and was recertified provisionally due to a program review that is pending final disposition. The University's provisional program participation agreement with the federal Department of Education does not relate to

program review findings; rather, it is a procedural matter. The federal Department of Education responding to staff inquiry about this matter clarified that almost all schools that are scheduled to undergo recertification to participate in the federal student aid programs during a program review process are provisionally recertified until the program review is finally and officially concluded.