

Iowa College Student Aid Commission
March 15, 2013



IOWA COLLEGE STUDENT AID COMMISSION

Guiding Statements

Our Mission

We advocate for, and provide a continuum of services to support, Iowa students and families as they explore and finance educational opportunities beyond high school.

Our Motto

Your Financial Aid Connection.

Our Vision

All Iowans can achieve an education beyond high school.

Our Guiding Principles

We believe in the value of education and our commitment is to:

- Put students first.
- Uphold the public trust.
- Develop and empower a motivated, compassionate, and professional team.
- Create and nurture internal and external partnerships that benefit our customers.
- Provide services to our customers that exceed expectations and address their changing needs.
- Respect and honor the dignity of each other and all those we serve.

IOWA COLLEGE STUDENT AID COMMISSION

A G E N D A

March 15, 2013

10:00 A.M.

Iowa College Student Aid Commission
Conference Room

- * 1. Minutes of Meeting Tab A
 - January 18, 2013
- 2. Executive Director's Report..... Tab B Misjak
- * 3. Consent Agenda Tab C Misjak
 - a. Postsecondary Registration
 - St. Luke's College (13-03-C1)
 - Waldorf College (13-03-C8)
 - Columbia Southern University (13-03-C17)
 - Kaplan University (13-03-C27)
 - University of Maryland University College (13-03-C29)
 - Vatterott College (13-03-C42)
 - College of Saint Mary (13-03-C55)
- 4. Ashford University Discussion Tab D Small
- * 5. ME&V Contract Extension Tab E Doe
- * 6. Printing, Storage and Distribution RFP Tab F Doe
- * 7. Committee Reports Tab G
 - Legislative Committee Leeper
- 8. Staff Reports..... Tab H
 - Administrative Budget/Expenditure Summary..... May
- 9. Adjournment

* *Indicates Action Item*

UPCOMING MEETING DATES:

May 17, 2013

**IOWA COLLEGE STUDENT AID COMMISSION
MINUTES OF MEETING
January 18, 2013
10:00 a.m.
Iowa College Student Aid Commission
603 East 12th Street, 5th Floor, Des Moines, Iowa 50319
Conference Room**

Members Present:

Janet Adams	Roger Claypool
Bob Donley	Cindy Winckler
Crystal Ford	Karolyn Wells
Jeremy Varner	

Members Present by Phone:

Doug Shull

Members Absent:

Randy Feenstra	Herman Quirnbach
Robert Denson	Fred Moore
Elizabeth Sullivan	Ron Jorgensen

Staff Present:

Todd Brown	Heather Doe
Julie Ntem	Julie Leeper
Karen Misjak	Carolyn Small
Kris May	

Attorney General Present:

David VanCompernelle

Guests Present:

Angela Carlson	Capri College
Dawn Nardini	Ashford University
Robin Madison	Legislative Services Agency
Heather Gaumer	Simpson College
Matt Brown	Iowa Student Loan

Guests Present by Phone:

Chris Reeves	Shiloh University
Daniel Loht	The Pennsylvania State University
Paul Massman	Concordia University Irvine
Michael Shreve	Savannah College of Art and Design

Call to Order

The Iowa College Student Aid Commission met for a regularly scheduled meeting on January 18, 2013. Commission Chair Adams called the meeting to order at 10:00 a.m. without a quorum present.

Executive Director's Report

Ms. Misjak updated Commissioner's on the Biennial Report submitted to United States Department of Education. The report shows the early assessment of GEAR UP Iowa cohorts (Class of 2014) is gaining in reading, math and science proficiency compared to the Class of 2013.

Ms. Misjak reported that new employees at the Commission include Kris May, Jesa Wolthuzen, Tim Henriksen, Cara Graziano and Joe Dullard.

This is the time of year for completing the FASFA. In the first 17 days, 1,178 FASFAs have been filed.

The building in which the Commission is currently housed is to be tore down July 1st. A new location has not been found yet. We are looking at Iowa Workforce Development for \$13.50 per square foot and Riverfront for \$10 per square foot, but neither is an ideal spot. We will continue to look at properties.

Great Lakes projected revenues for 3 months to be approximately \$1,297,338. For those 3 months the Commission has received a total amount of \$1,271,823.

Commissioner Doug Shull dialed in by phone at 10:14 am. Quorum present.

Legislative Committee Report

Julie Leeper gave an overview of a white paper being prepared for legislators at the legislative committee meeting held this morning. Legislators have been asking questions regarding the Commission's programs and financing, and this white paper is designed to answer those questions. As a result of feedback from the Legislative Committee, staff will update this document and send it to the Commission for review.

Meeting Minutes November 16, 2012

Motion: Commissioner Ford moved to approve the November 16, 2012 Meeting Minutes as written. Commissioner Wells seconded the motion, which passed unanimously.

Consent Agenda

Chair Adams asked for a motion to approve the consent agenda.

Motion: Commissioner Shull moved to approve the consent agenda as written to include: Postsecondary Registrations for Shiloh University 13-01-D1, Concordia University Irvine 13-01-D7, Savannah College of Art and Design 13-01-D12, and The Pennsylvania State University 13-01-D18. Commissioner Donley seconded the motion, which passed unanimously.

Staff Reports

Kris May gave an update on December 2012, FY2013 year-to-date financials.

Ms. Misjak gave an update on the Commission's Strategic Plan. A consultant has been hired to facilitate two half-day meetings with staff, to be followed up by a full-day meeting to which Commissioners will be invited. We will wrap up the plan in March, at which time we will ask for approval of the 3-year Strategic Plan. Julie Leeper gave a wrap up of the 2010-2012 Strategic Plan. There were 3 goals: the Commission has funding that supports and enhances its services; Iowa students and families plan, prepare and pay for education beyond high school; and the Commission is Iowa's partner for value-added higher education information and resources.

Goal 1: Two federal grants, College Access Challenge Grant and GEAR UP, were received to support the Commission on its goals. The Commission reduced costs from FY2010 totaling \$20.61 million to \$13.7 million by FY2012. Cost reductions included decreasing expenditures in marketing, rent, FFELP, and staff.

Goal 2: The Commission focused on key publications and increasing the number of outreach channels. A Financial Literacy Program was launched. Commissioner Donley inquired about how the Commission tracks the success of our programs on default rate. Ms. Misjak responded that there is tracking data available from the US Department of Education, and stated the Commission is receiving more questions from parents and students due to the publicity around higher student loan debt.

Goal 3: The Commission has partnered with several organizations to add value to higher education information and resources.

Julie Leeper gave an update on the Commission's Pro-treat held July 31, and August 1, 2012. Many of the action items discussed during the Pro-treat will be addressed in the next Strategic Planning process. Eight major categories were discussed: request for information, cost benefit per program, how we analyze the data, technical issues, Postsecondary Registration, I Have A Plan Iowa® and Financial Literacy, issues that require Code changes and legislative action, funding concerns and other issues.

There have been several discussions on automating the process for Postsecondary Registration. Commissioner Varner asked if we have enhanced I Have A Plan Iowa® with hot jobs. Staff has been in contact with XAP regarding this issue. EverFi developed the Financial Literacy and Buttonwood programs. Representative Winckler and Commissioner Claypool praised EverFi for the work it does. Representative Winckler suggested the Commission work with the State Library to have financial literacy information available in libraries. Commissioner Varner inquired about I Have A Plan Iowa® and Clearinghouse partnership. Ms. Misjak stated staff met with the Clearinghouse, and is continuing those discussions.

In response to further Pro-treat discussions, Representative Winckler stated she understands the National Guard has concerns with requiring its members to file the FASFA, but she feels it is essential that Guard members do complete the FASFA so that they do not miss opportunities for assistance in funding their education.

Julie Ntem gave an update on I Have A Plan Iowa®. As of January 15, 2013, 291,218 total accounts have been created. By role they include Middle and High School, 212,007; Parents 8,937; Postsecondary 62,723; and Adults 7,551. Since July 1, 2012 there have been 39,934 new accounts created. Ms. Ntem provided a graph which explained the number of accounts created. Representative Winckler inquired about trying to focus on urban schools to increase that number. Ms. Ntem stated staff is working on this with GEAR UP and I Have A Plan Iowa® trainers but stated we don't want to forget about the rural students as well. Starting in 8th grade, all students must create portfolios, complete career interest assessments, career cluster assessments, identify career clusters of interest, build course plans for high school and obtain parent's approval. In 9th grade, students complete the interest profiler assessment, a career assessment linking interests and school subjects, revise and rebuild their course plan and complete a student reflection paragraph. In 10th grade, students complete a work values and beliefs survey, compare career options side by side, compare colleges and programs side by side, review and revise their course plan and complete a student reflection paragraph.

Commissioner Donley asked if students are using test prep. Ms. Ntem stated growth has occurred; however, not as many are using this as we would like. GEAR UP and I Have A Plan Iowa® trainers are working to promote it.

In 11th grade, students complete a skills inventory checklist or assessment, create a resume and cover letter, compare schools and programs side by side, note any postsecondary visits (virtual or physical), complete a practice postsecondary application, research financial aid information and scholarship information, review and revise their course plan and complete a student reflection paragraph. In 12th grade, students retake the interest profiler and compare results with 9th grade results, retake a career assessment linking school subjects and careers and compare results with 9th grade, review schools and colleges and indicate choices, research job interview information and complete a job interview practice, review and revise their career plan and postsecondary opportunities and complete a student reflection paragraph. Representative Winckler stated in grades 10 and 11, staff should provide information about test prep to get students engaged and aware of ACT test prep.

Commissioner Varner stated work keys assessments should be integrated and wondered if there is a way to automate. Ms. Ntem stated the vendor has noted this request.

Motion: Commissioner Donley moved to adjourn at 11:06 a.m. Commissioner Ford seconded the motion, which passed unanimously.

JANET ADAMS, CHAIR

CRYSTAL FORD, VICE CHAIR

IOWA COLLEGE STUDENT AID COMMISSION

Executive Director's Report March 2013

Impact of Sequester on Commission Programs

On March 1, President Obama signed an order that implemented sequestration. Sequestration will achieve almost \$1 trillion in deficit reductions in the next ten years through across-the-board budget cuts. Several federally-funded programs administered by the Commission will be impacted by the sequestration, although the exact details are still unknown. A brief overview of each impacted program is listed below.

- John R. Justice Student Loan Repayment Program:
Sequestration will not impact current 2012-13 loan repayment awards to eligible attorneys, although 2013-14 awards will be impacted. No details of the amount of reductions are available at this time. The Commission traditionally receives the Grant Award Notice (which authorizes our state funding level for this program) from the Department of Justice in August of each year.
- Education and Training Voucher Program (ETV):
Sequestration will not impact current 2012-13 funding, although 2013-14 awards will be impacted. No details of the reduction amounts are available at this time, but staff is expecting a 5% reduction in the 2013 ETV award allocation. The Commission traditionally receives the funding allocation notice (which authorizes our state funding level for this program) in April of each year.
- GEAR UP Iowa:
Sequestration will not impact current 2012-13 (FY12) GEAR UP funding, although 2013-14 (FY13) awards will likely be impacted. GEAR UP Iowa was partially forward-funded for FY13 (funding for Year 6 of the 6 year grant which is currently in Year 5) in the amount of \$ 1,489,283 by the United States Department of Education (USDE) last fall with remaining funds from the FY12 USDE budget. While final details of a potential reduction amount aren't available at this time, the USDE communicated via conference call on March 5, 2013 that a 5% reduction of the remaining \$ 1,310,717 in funding for the GEAR UP Grant is likely if sequestration remains in place and a continuing resolution is passed that continues funding the Federal Government at FY12 levels. The Commission traditionally receives the GEAR UP Grant Award notice (which authorizes our funding level for this program) in July of each year.

Student and Ethnic Diversity Report Released March 1

As required by Iowa Code Section 261.2, the College Student Aid Commission released its Student and Faculty Ethnic Diversity Report on March 1, 2013. This annual report summarizes trends in representation by minority population groups among students, faculty, and state financial aid recipients at Iowa colleges and universities. The Commission has published this report annually since 1992. Significant findings from this year's report include:

- In the fall of 2012, approximately 30,565 minority students were enrolled at Iowa colleges and universities.
- Between fall of 1992 and fall of 2012, enrollment of racial and ethnic minority students at Iowa colleges and universities has more than doubled.
- Racial and ethnic minorities represented 12.9 percent of total enrollment in the fall of 2012; and 61.5 percent of the minority enrollment were Iowa residents.
- White, non-Hispanics make up 77 percent of the Iowa-resident minority student population.

Among Iowa-resident minority students, 9.7 percent were awarded an Iowa Grant, Iowa Tuition Grant, Iowa Vocational-Technical Tuition Grant or an All Iowa Opportunity Scholarship.

Move Update

Department of Administrative Services is in the process of negotiating a lease for rental space at 430 E. Grand Ave. An update will be provided at the Commission meeting.

IOWA COLLEGE STUDENT AID COMMISSION

St. Luke's College Voluntary Application for Postsecondary Registration in Iowa March 2013

RECOMMENDED ACTION:

Approve the voluntary application for postsecondary registration in Iowa for St. Luke's College.

As a condition of registration:

- By the beginning of the Fall Term 2013, the College must develop, implement, and provide staff with a copy of a policy that complies with new Iowa Code Section 261.9(1)"h" (as enacted by Iowa Senate File 2225).

Note: Iowa Senate File 2267 enacted a change in Iowa Code Section 261B.3 that reduces the registration term from 4 years to 2 years, effective July 1, 2012. All schools that the Commission approves for initial or renewal registration after July 1, 2012, will be registered for a term of 2 years.

Registration Purpose

St. Luke's College in Iowa is currently eligible for an exemption from registration under Iowa Code Section 261B.11, subsection 1, paragraph "j," for "Higher education institutions that meet the criteria established under section 261.9, subsection 1." In other words, St. Luke's meets the institutional eligibility criteria for the Iowa Tuition Grant Program. The school voluntarily requests registration 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

St. Luke's College is a non-profit school located on the campus of St. Luke's Health System at 2720 Stone Park Boulevard, Sioux City, Iowa. The College's main campus is located at 2800 Pierce Street in Sioux City, and it also offers instruction on the campus of Dordt College, 498 4th Ave. NE, Sioux City. The College's Chief Executive Officer is Chancellor Michael D. Stiles, at 2720 Stone Park Boulevard, Sioux City Iowa. The College's Iowa contact person is its Student Services Department Chair, Danelle Johannsen, at the same address.

St. Luke's College is owned by the Northwest Iowa Hospital Corporation doing business as St. Luke's Regional Medical Center. St. Luke's Regional Medical Center is an affiliate of the Iowa Health System. Therefore, the school is independently audited for financial responsibility and federal student aid compliance purposes as part of the Iowa Health System. Since the school is a subdivision of an Iowa hospital, it is not registered with the Iowa Secretary of State as a separate entity transacting business in Iowa.

St. Luke's College should not be confused with Mercy/St. Luke's School of Radiologic Technology in Cedar Rapids, IA, although both are subsidiaries of hospitals that are affiliates of the Iowa Health System.

Physical Facilities: St. Luke's College operates as a division of St. Luke's Regional Medical Center and all physical assets of the College are similarly physical assets of the Medical Center. The College currently controls the majority of the property consisting of 29,090 square feet at 2800 Pierce Street, Sioux City, in the Physician Center One Building. The College has exclusive control of the use and scheduling of a major portion of the second floor and the entire third floor, comprising a total of 25,321 square feet. This space is home to Nursing, Respiratory Care, Imaging Sciences Education, Medical Laboratory Sciences, Clinical Pastoral Care, and the College Library. The College controls a portion of the fourth floor comprising 3769 square feet which houses the Administration Suite and Student Services Suite. The College also provided a list of approximately 60 locations in Iowa, South Dakota, and Nebraska where it provides structured clinical experiences for students enrolled in its Imaging Sciences, Respiratory Therapy, and Nursing programs.

Accreditation: The College is accredited by the Higher Learning Commission (HLC), a regional accrediting agency recognized by the federal Department of Education. In addition, its nursing program is accredited by the National League for Nursing Accrediting Commission, an accrediting agency recognized by the federal Department of Education, and approved by the Iowa Board of Nursing. The school's radiologic programs are accredited by the Joint Review Committee on Education in Radiologic Technology, also an accrediting agency recognized by the federal Department of Education.

Federal Stafford Loan Cohort Default Rate (FFY 2010): 2.8%. For comparison purposes, the FFY 2010 national average cohort default rate is 9.1%.

Graduation Rate: 100%. 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 College discloses that first-time, full-time students are not a large population of its graduates.

Average Loan Debt upon Graduation: For May 2011 graduates –

- Nursing graduates: \$21,796
- Radiology Technology graduates: \$14,150
- Respiratory Care graduates: \$10,563
- All St. Luke's College graduates: \$17,017

Record Preservation: Once a student is no longer enrolled at St. Luke's College, the student's academic files are permanently retained in a fireproof file cabinet in a locked storage room. Financial aid files are retained in a locked storage room for five years. The College is initiating a process to scan documents and store them on the college server for future reference.

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

Michelle Fitch
Students Services Department
2720 Stone Park Boulevard
Sioux City, IA 51104
(712) 279-3503

Instructional Methodology: Predominately face-to-face instruction. Clinical field experiences are conducted with a faculty member or preceptor. St. Luke's College utilizes an online student portal to deliver some course material. In addition, the College offers several general education courses in which classroom assignments, documents, or other information is provided to students via an online student portal. None of the College's courses are 100% online.

Student Learning Resources: The library has 3100 reference materials: 982 nursing references, 83 general education references, 78 respiratory care references, 83 imaging sciences references, 150 print journals and approximately 7000 online journals. Many research resources may be accessed online at <http://www.stlukescollege.edu/default.cfm?id=128>. In addition, the College library participates in interlibrary loan services with a variety of libraries in the United States. Interlibrary loan requests may be made online at <http://www.stlukescollege.edu/body.cfm?id=135> and a small fee may apply to materials requested for educational purposes. The College library offers two full-time staff members to assist students during business hours.

The Student Services Department at the College also provides a variety of student support services including admissions counseling, free tutoring, advising, personal counseling, and student health, as well as activities that promote personal and professional growth.

Curriculum Evaluation and Development: Members of the College community conduct evaluation activities related to curriculum currency and rigor. A request for a curricular change can be originated by faculty or a member of the administrative team such as a department chair. Faculty discuss with the department chair of the respective program any curriculum revisions. Department chairs initiate discussion with the faculty when curriculum revisions are due to an accreditation requirement or change; the result of trends in the field; or modifications in convention. Discussion of revisions occurs during staff meetings where minutes are kept. Ad hoc committees may be created to further assess curricular needs and/or generate recommendations for curricular revision.

Once program faculty has approved the changes to curriculum, these changes are brought to the College Cabinet for review and endorsement. The College Cabinet members are the Chancellor, Chief Academic Officer/Executive Dean, Department Chairs from Nursing, Imaging Sciences, Respiratory Care, Medical Laboratory Sciences, and Clinical Pastoral Care Education, Library and Student and Administrative Services.

The changes are then brought forward to the College Quality Management Council (QMC) for review. This council serves as a link between the program and the College Assembly. Members of QMC are representatives from each program and service arms of the college. QMC then recommends endorsed curriculum changes as information items to the College Assembly. The curricular changes are then brought to the College Board as an information item by the respective Department Chair.

Revisions are officially submitted to programmatic accrediting agencies as called for in the terms of the accreditation after final college approval and prior to implementation of the change.

Recruitment materials are updated to reflect curricula changes upon accreditation approval.

Student Complaints Process: The College disclosed its process for handling formal student complaints and provides information about that process to students in its Student Handbook <http://www.stlukescollege.edu/Documents/Admissions/2012-13StudentHandbook.pdf>. Students should make a good faith effort first to resolve a conflict with the involved party and the Department Chair. If no resolution is found, the student must submit the complaint in writing to the Administrative and Student Services Department Chair. Administration creates a file containing pertinent information about the progress and outcome of the complaint. Students may select a faculty advocate. Formal appeals and grievances are reviewed by a Committee of individuals appointed by the Executive Dean/Chief Academic Officer. If no satisfactory resolution is achieved at this level, the dissatisfied party must appeal in writing to the Executive Dean/Chief Academic Officer. A student who does not receive a satisfactory resolution at this level may appeal to the Chancellor of the College, whose decisions are final.

Programs Offered In Iowa

St. Luke's College offers the following health sciences-related programs in Iowa. Total estimated tuition charges, fees, books, supplies, and other costs payable to the school by a student is provided for each program.

- Associate of Science in Nursing: \$18,925 annually
- Associate of Science in Radiology Technology: \$18,975 annually
- Associate of Science in Respiratory Care: \$18,875 annually
- *Medical Laboratory Science (40 semester credit hours; non-credential): \$5,700 annually. Graduates are prepared to take a national Medical Laboratory Scientist certification examination and may transfer credits earned at St. Luke's into a baccalaureate degree program at any one of a number of colleges that partner with St. Luke's for this purpose.
- *Phlebotomy certificate: \$800 total
- *Mammography certificate: \$1200 total
- *Computerized Tomography certificate: \$2200 total
- *Magnetic Resonance Imaging certificate: \$2200 total
- *Ultrasound/sonography certificate: \$3800 total
- *Clinical Pastoral Care: \$500 total

*These St. Luke's College course offerings are not "eligible programs" for federal student aid.

Registration Compliance

As required by Iowa Code Section 261B.4, St. Luke's College disclosed its policy on refunding tuition charges for withdrawn students. The policy is disclosed in the school's Student Handbook <http://www.stlukescr.org/our-services/all-other-services/imaging-services/school-of-radiologic-technology/>. The school's specific tuition refund policy is not a criterion for registration.

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. St. Luke’s College maintains these policies and discloses them in their Student Handbook at <http://www.stlukescollege.edu/Documents/Admissions/2012-13StudentHandbook.pdf>.
- Iowa Code Section 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. St. Luke’s College updated its military refund policy to comply with this administrative rule requirement and provided the compliant policy as an addendum to its registration application.
- Iowa Senate File 2225 created a new Iowa Code Section 261.9(1)(h). This new 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 new policy now applies to Iowa’s registered schools. Staff request that the Commission waive enforcement of this new rule as it relates only to registration qualifications for the same delayed enforcement period that staff has granted to Iowa’s own schools for the purpose of qualifying for state-based student financial aid, i.e., until the fall of 2013. Schools that are scheduled for registration consideration during the waiver period will be expected to develop and implement a policy that complies with new Iowa Code Section 261.9(1)(h) by the end of the waiver period.

Student Consumer Information: In its registration application, St. Luke’s College affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school’s programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school’s accrediting agency. 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. St. Luke’s College prospective students receive this information during a required Program Conference. Information shared at this conference is also available on the school’s website at www.isrt.org/ResourceCenter/mstl.aspx and in its Student Handbook <http://www.stlukescollege.edu/Documents/Admissions/2012-13StudentHandbook.pdf>.

St. Luke’s College 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 College will disclose this information on its website.

Financial Responsibility: St. Luke's College submitted an audit report dated April 12, 2011, for its parent entity, Iowa Health System and Subsidiaries, conducted by an independent auditing firm BKD, LLP, covering the fiscal year ending on December 31, 2010. The audit report specifically identifies St. Luke's College as a subsidiary of the Iowa Health System. The auditing firm expressed its unqualified opinion that the system's financial statements present fairly, in all material respects, its 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 financially responsible without additional oversight. While the independent firm that audited Iowa Health System and Subsidiaries did review federal student aid compliance performance of its system schools, staff did not find that the independent auditing firm reported or tested St. Luke's College composite score. The most recent composite score available from the federal Department of Education for St. Luke's College is 3.0.

Full-Time Iowa Resident Faculty Member or Program Coordinator: St. Luke's College employs 9 full-time faculty and staff, including its Chancellor, Department Chair of Student Services, Department Chairs of Nursing Education, Respiratory Care, Medical Laboratory Sciences, and Imaging Sciences, and Clinical Coordinators in Imaging Sciences, Respiratory Care, and Nursing.

Instructional/Supervisory Staff Qualifications: St. Luke's College submitted resumes for approximately 27 of its full- and part-time academic leaders and faculty that included information about the position each holds at St. Luke's. All appear to have educational and/or experiential qualifications for their assignments. Staff note two instructors in the imaging sciences department who do not have a graduate degree but both have a bachelor's degree, training, and experience in the fields of education and radiologic technology. The imaging sciences department is chaired by an individual with a terminal degree who has considerable experience as an academic administrator and administrator of hospital-based medical imaging programs. The single faculty member in the College's pastoral care program has a doctorate in ministry and is an experienced chaplain. One of the two faculty in the respiratory care department does not have a graduate degree, but does have approximately 19 years experience as a respiratory therapist and another 10 years experience as a clinical coordinator. The respiratory care department chair has a baccalaureate degree in respiratory therapy and a master's degree in teaching. The medical sciences program chair has a graduate degree in administration and a bachelor's degree in medical technology. Of approximately 20 nursing faculty, one has a doctorate in education, 17 hold a graduate degree in health sciences or nursing, two have a baccalaureate degree in nursing, all are registered nurses, at least five are Certified Nurse Educators through the National League for Nursing. Among the nursing faculty, special experience is noted in fetal monitoring, neonatal care, pediatrics, obstetrics, acute care, oncology, infection control, and gerontology.

Commitment to Iowa Students and Teach-Out: The College's registration application includes a written statement from Chancellor Michael D. Stiles affirming the school's commitment to serve the students that are admitted and enrolled in any of the institution's programs of study. In the event that St. Luke's chooses to no longer offer a full-time certificate or degree program, the College will provide as much notice as possible to currently enrolled students and will immediately cease accepting and processing applications for admission to the impacted program of study. Furthermore, the College will work individually with each currently enrolled student to assist them in the identification of opportunities to

complete their selected course of study within St. Luke's College or at another institution of higher learning within the region that are offering the same or similar certificate or degree program. To the extent possible, St. Luke's College will provide support services beyond identification of alternative institutions, to include as appropriate, letters of recommendation or support, transfer of academic records, and other services to ease the transition from St. Luke's College to another institution of higher learning.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Staff approved the College's application for an exemption from the financial responsibility requirements of Iowa Code Section 714.18, based upon its approval by the Iowa Board of Nursing to offer a nursing licensure preparation program. Iowa Code Section 714.19, subsection 2, provides for an exemption for "Schools of nursing accredited by the board of nursing or an equivalent public board or another state or foreign country."

Effective July 1, 2012, new revised Iowa Code Section 714.24, subsections 1 and 2, requires a school that is governed by the financial responsibility and exemption provisions of Iowa Code Sections 714.18 and 714.19 to renew evidence of financial responsibility or substantiate continued qualification for an exemption, at minimum, every two years. This renewal may occur at the same time the College applies for registration renewal, which is also now on a 2-year cycle.

Section 714.23 – State Tuition Refund Policy

The Iowa tuition refund policy does not apply to St. Luke's College because it is a private nonprofit institution.

IOWA COLLEGE STUDENT AID COMMISSION

Waldorf College Voluntary Registration Renewal Application March 2013

RECOMMENDED ACTION:

Approve Waldorf College's voluntary request to renew its Iowa registration.

As a condition of registration:

- By the beginning of the Fall Term 2013, the College must develop, implement, and provide staff with a copy of a policy that complies with new Iowa Code Section 261.9(1)"h" (as enacted by Iowa Senate File 2225).

Note: Iowa Code Section 261B.3, generally effective July 1, 2012, reduces the registration term from 4 years to 2 years, effective July 1, 2012. All schools that the Commission approves for initial or renewal registration after July 1, 2012, will be registered for a term of 2 years.

Registration Purpose

Waldorf College is presently exempt from registration in Iowa under Iowa Code Section 261.11, subsection 1, paragraph "j", i.e., the College meets the institutional eligibility conditions for the Iowa Tuition Grant program and receives funding for its students from that program. However, the College wishes to maintain voluntary registration in Iowa to comply with federal regulations in 34 CFR 600.9. These federal regulations require a school participating in the federal student aid programs to be authorized to operate, by name, as a postsecondary educational institution by an action of the State in which the school is located. The College also wishes its online programs to be acknowledged under its Iowa registration.

Institutional Information

Waldorf College is a for-profit institution located at 106 South Sixth Street, Forest City, Iowa. The College also maintains administrative offices to support its online programs at 21982 University Lane, Orange Beach, Alabama. The College's Chief Executive Officer is President Bob Alsop, Ph.D., at the Forest City, Iowa, address. The Chief Executive Office of Waldorf's parent organization, Columbia Southern Education Group, is Robert Mayes, Jr., 21982 University Lane, Orange Beach, Alabama. Mayes Education, Inc., doing business as Waldorf College and Columbia Southern Education Group are listed on the application as entities which own more than 10% of the school.

The legal governing body of the school is the President's Council led by Waldorf College President Bob Alsop, which provides leadership and management for daily operations. The Waldorf College President reports to a Board of Trustees, which provides comprehensive oversight of the College. The College provided a listing of the members of the President's Council and the College Board of Trustees. The majority of the President's Council is comprised of administrators in academic, business, admissions, marketing, student affairs, and athletic departments at the Forest City, Iowa,

campus. While there are three members of the Board of Trustees that are associated with the College's parent company, Columbia Southern Education Group, the majority of Board and its Chair appear to be public members with administrative, academic, and financial backgrounds and expertise. The Waldorf Board of Trustees maintains and publicly posts a Conflict of Interest policy <http://www.waldorf.edu/Residential/About-Us/Board/Conflict-of-Interest-Policy> that provides guidelines for Trustees having a relationship with any organization or person that involves a financial interest in, or holding of a position of authority with, any party conducting business with the College.

The designated Iowa contact person for Waldorf College is Laura Friesenborg, Online Program Director, at the Waldorf College campus location.

Physical Facilities: Waldorf College maintains its only campus in Forest City. A campus map and photographs available on the College's website at <http://www.waldorf.edu/Residential/About-Us/Campus-Map> indicates that current physical facilities are sufficient for the administrative, academic, co-curricular, and residential needs of its residential student body of less than 500 students. The College also maintains a television and radio station on its campus.

The College provides administrative support services for its online programs from offices located in Orange Beach, Alabama, and has 11 employees at that location. These 11 employees include eight Admission Representatives, two Student Services Representatives, and an Assistant Registrar, who report to the Waldorf College Registrar in Forest City, Iowa. Waldorf College indicates that, for its online program students, required residencies in certain programs will occur at the College's Iowa campus or in temporary conference facilities, to be determined, in cities such as Des Moines, Cedar Rapids, Davenport, or Clear Lake. Waldorf's current online enrollment is approximately 400 students.

Accreditation: The College is accredited by the Higher Learning Commission (HLC), a regional accrediting agency recognized by the federal Department of Education.

Other Approvals: The Iowa Board of Education has approved Waldorf College's on-campus elementary and secondary teacher preparation programs for initial licensure in Iowa. The Iowa Board of Education's next review of these programs is scheduled for 2013.

Federal Stafford Loan Cohort Default Rate (FFY 2010): 6.3%. For comparison purposes, the FFY 2010 national average cohort default rate is 9.1%.

Graduation Rate: 45%. 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.

Average Loan Debt upon Graduation: For students graduating from Waldorf in 2010-2011, the average loan debt was \$23,117. The average federal loan debt for the same cohort of students was \$20,384.

Record Preservation: The Registrar's Office at the Waldorf College campus in Forest City, Iowa, maintains registration information for two years after a student leaves the College or graduates. Student transcripts are maintained permanently. Hard copies and electronic copies, since 1986, have been stored on-site at Waldorf College. Electronic copies of transcripts are also backed up on disks, which are stored off-site in a bank safety deposit box. Student Life maintains records, such as tuition and housing forms and receipts, for seven years after the student leaves the College or graduates. Financial Aid maintains student records for three to five years after a student leaves the College or

graduates, with longer retention of records if needed for open items in an audit. Perkins loan student records are kept for seven years after the loan is paid off. Business Office records are kept for five to seven years after a student leaves the College or graduates.

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

Twyla Kraal, Registrar
Waldorf College Registrar's Office
106 South Sixth Street
Forest city, IA 50436
(641) 585-8139

A student may also make an online request for transcripts at
<http://www.waldorf.edu/Residential/Academics/Registrar-s-Office/Request-a-Transcript>.

Instructional Methodology:

Residential program instruction is delivered primarily through face-to-face, classroom instruction. Faculty uses a variety of instructional technologies that are integrated in the face-to-face instruction to enhance student learning. Programs such as Communications and Theatre Arts include a practicum component in which students gain hands-on experience each semester through experiential learning in, for example, the college radio station or the Theatre Department. Elementary and secondary education programs include school field experiences throughout the curriculum in addition to the requisite student teaching practicum during the final semester of the program. Most programs include either an internship or a thesis as part of the curriculum. These experiences are designed to provide students with specialized experience in an interest area, either in the form of practitioner experience or research. Student interns have an on-site supervisor and faculty oversight. Programs that permit the option to conduct a thesis in lieu of an internship are humanities-related programs, such as English and History. The thesis provides students with the opportunity to gain in-depth research experience within a specialized topic of interest under the supervision of a professor. Generally, residential student may register for a maximum of two online courses during their baccalaureate programs. Certain programs such as Fire Science Administration, International Management, Organizational Leadership, and Sport Management, are offered in a blended format that provides a mix of residential and online courses. Waldorf also offers occasional international learning opportunities, typically during the summer semester.

Online program instruction is delivered over the internet asynchronously. However, each of Waldorf's online programs also includes a residential "seminar" component that occurs on the Waldorf campus or at another location that is geographical convenient for students in Iowa, or in other states in which Waldorf is approved to do so. For every 30 credits earned through online courses, students complete a three-day, one-credit course through face-to-face instruction. For a full-time student, this generally equates to one face-to-face residential course requirement per year.

Student Learning Resources: The Luise V. Hanson Library provides students access to 60,219 volumes on the library's shelves, including 3,371 bound serials, 111 current print serial subscriptions, 4,381 audio/video items, and 8,988 cataloged e-books. The Library subscribes to 30 online databases that include abstracts and full text articles supporting the College's residential and online degree programs. The Library is staffed with two professional librarians who hold master's degrees in Library Science, four library assistants, and several students serving the library under the Federal Work Study

program. The Library contains eight public computers, two classrooms, several study spaces, four study rooms containing a white board and laptop hook-ups for student use, and one seminar room with projection units and white boards. Residential students are also provided tutorial services, educational training and seminars, learning style assessments, and an academic support program for underprepared students or those seeking to learn better study skills.

The Library provides interlibrary loan services, generally at no charge, and through the Library residential and online students may access the Waldorf College Writing Center. Online students are introduced to the Hanson Library's resources and services during a course each online student takes during his initial semester of enrollment. Online students may seek library assistance via phone or e-mail. In addition, online students have access to the Columbia Southern University Online Library. Technology support is available to online students from Waldorf's Institutional Technology Department via e-mail or phone Monday through Friday, 8 am to 11 pm central standard time. Tutoring support is provided to online students in math as well as writing from 8 am to 5 pm Monday through Thursday and 8 am to 2 pm on Friday.

Curriculum Evaluation and Development: All new courses must be approved by the majority of the originating department faculty in order to be considered by the faculty senate. The faculty senate routes the proposals to any other department or committee that may be affected by the change, such as the core curriculum committee, before considering the course. The senate shares all proposals with the full faculty three days before consideration, allowing for faculty input. A majority vote by the senate is required for approval. If a faculty member disagrees with the decision of the senate, that decision may be appealed to a full faculty meeting. In addition all new curricula and curricular changes are brought to the faculty senate for recommendation to the full faculty for approval.

All online classes are developed by either 1) a member of residential Waldorf College faculty who is a professor in the academic major for which the course is being developed, or 2) an adjunct faculty member who meets the minimum credentials set by the Higher Learning Commission and who has been approved by the residential program's Department Chair.

Departments that offer majors submit assessment reports in a three-year cycle. These reports are reviewed by the Assessment Committee, which offers feedback to the departments and routes requests appropriately. Faculty who teach courses responsible for core curriculum goals operate as a consortia. These consortia submit reports to the Core Curriculum Committee where they are reviewed. The Core Curriculum Committee writes a report on the core goals and submits the report to the Assessment Committee who offer feedback to the consortia.

Student Complaints Process: The College disclosed its process for handling formal student complaints and provides information about that process to students in its Residential Student Handbook and, for online students, on its Online Degree Program web site:

- <http://www.waldorf.edu/Residential/Current-Students/Policies/Student-Handbook>
- <http://www.waldorf.edu/Online/About-Us/Accreditation-and-Memberships/Registering-a-Complaint>

All grievances should be addressed initially to the office/person involved in the dispute. When situations cannot be resolved at this level, the dispute should be taken to the supervising person or office. Students may contact the Dean of Students for assistance in resolving a grievance or obtaining information about the appropriate office or person with whom to discuss a grievance.

An online student who has been unable to resolve a dispute through discussion with the party involved may voice the concern in writing to the Assistance Dean for Online Learning. If the student is not satisfied with the Assistant Dean's response, the student may appeal the decision to the Waldorf College President.

Programs Offered In Iowa

Residential Programs

Note: Total estimated costs reflected below are **annual** tuition, fee, book, and supply charges.

Baccalaureate Degree Programs

- Biology - \$20,249
- Business - \$19,815
- Communications - \$19,690
- Creative Writing - \$19,611
- Criminal Justice Administration - \$19,675
- Elementary Education (licensure in Iowa) - \$19,738
- Secondary Education (licensure in Iowa) - \$19,728
- Foundations of Education (non-licensure) - \$19,689
- English - \$19,686
- Fire Science Administration - \$19,689
- History - \$19,622
- Humanities - \$19,613
- Interdisciplinary - \$19,786
- International Management - \$19,822
- Music - \$20,601
- Organizational Leadership - \$19,839
- Psychology - \$19,684
- Sport Management - \$19,763
- Theatre Arts - \$19,341
- Wellness - \$19,884

Associate Degree Program

- Liberal Arts - \$19,781

Online Programs

Note: Total estimate costs reflected below are **annual** tuition and fee charges. The Waldorf Book Grant provides textbooks at no cost to online students who *successfully complete the course for which the text is provided*. Students who do not successfully complete a course through which a Book Grant is used will be responsible for the return or the cost of the course textbook(s).

Baccalaureate Degree Programs

- Business Administration - \$6,780
- Communications (not yet offered) - \$6,780
- Criminal Justice Administration - \$6,780
- Fire Science Administration - \$6,780

- Organizational Leadership - \$6,780
- Psychology - \$6,780

Registration Compliance

As required by Iowa Code Section 261B.4, Waldorf College disclosed its policy on refunding tuition charges for withdrawn students. During the registration evaluation process, the College made further modifications to its policy and disclosed the revision to residential and online students in its respective and online program catalog addenda at <http://www.waldorf.edu/Download-Information>.

Since Waldorf College is a for-profit institution, its tuition refund policy for withdrawn students must comply with the provisions of Iowa Code Section 714.23. The College maintains a compliant policy for both its residential and online students. For additional information, see *Section 714.23 – State Tuition Refund Policy*, below.

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. Waldorf College maintains these policies and discloses them to students on its web site:
 - <http://www.waldorf.edu/Residential/Current-Students/Health-and-Safety/Substance-Abuse-Policies---Procedures>
 - <http://www.waldorf.edu/Residential/Current-Students/Health-and-Safety/Sexual-Assault-Policy>
- Iowa Code Section 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. Waldorf maintains this policy and discloses it to residential and online students in its respective residential and online programs catalog addenda at <http://www.waldorf.edu/Download-Information>.
- Iowa Senate File 2225 created a new Iowa Code Section 261.9(1)(h). This new 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 new policy now applies to Iowa’s registered schools. Staff request that the Commission waive enforcement of this new rule as it relates only to registration qualifications for the same delayed enforcement period that staff have granted to Iowa’s own schools for the purpose of qualifying for state-based student financial aid, i.e., until the fall of 2013. Schools that are scheduled for registration consideration during the waiver

period will be expected to develop and implement a policy that complies with new Iowa Code Section 261.9(1)(h) by the end of the waiver period.

Student Consumer Information: In its registration application, Waldorf College affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. 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. Waldorf College discloses this information in its residential and online program catalogs at <http://www.waldorf.edu/Download-Information>.

Waldorf College 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 College currently discloses its registration with the Commission and contact information for student complaints at <http://www.waldorf.edu/Residential/About-Us/Accreditation-and-Memberships/State-Licensure>.

Financial Responsibility: Waldorf College submitted an audit report dated June 22, 2011, for its parent company, Columbia Southern University, Inc., and Subsidiaries and CSU Properties, LLC, for the fiscal year ending December 31, 2010, conducted by the independent auditing firm Weworski & Associates. However, an updated financial audit was submitted by Columbia Southern University with its registration application and staff used the updated data provided by Waldorf's sister school. The updated independent auditing report for Columbia Southern University, Inc., and Subsidiaries, and CSU Properties, LLC, including Mays Education d/b/a Waldorf College, issued by the same firm, is dated June 25, 2012. The auditing firm expressed its unqualified opinion that the organization's financial statements present fairly, in all material respects, its financial position.

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 independent auditing firm that audited Columbia Southern University, Inc., and its subsidiaries did not report or test a composite score for Waldorf College. The most recent composite score available from the federal Department of Education is for the College's parent, Columbia Southern University: 3.0.

The federal Department of Education restricts the portion of a for-profit institution's income that may be derived from federal student aid funding to 90%. The independent auditors tested the 90/10 ratio for Waldorf College and reported that the percentage of revenue the College earned from Title IV aid during the fiscal year that ended on December 31, 2011 was 74.40%.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Waldorf College employs approximately 46 full-time residential faculty, listed at <http://www.waldorf.edu/Residential/About-Us/Directory>. Waldorf has a total of 204 full- and part-time faculty members, staff, and administrators. There are currently 53 online faculty members, of which 17 are employed full-time. The College employs 16 Iowa-resident, online faculty members, who teach in the following subject matter areas:

Christine Atwell – Introduction to Waldorf Online
Mark Clouse – Spanish
Joel De Boer – Business, Critical Thinking, Introduction to Waldorf Online
Heather Dewaard-Flickinger – Concepts of Wellness
Cassie Eno – Psychology
Laura Friesenborg – Introduction to Waldorf Online
Heather Jordan – Critical Thinking, Religion
LeAnn Nash – English Composition
Mark Newcome – Introduction to Waldorf Online
John Robinson – Accounting, Macroeconomics
Adam Sauer – Criminal Justice
Scott Searcy– Mathematics
Alan Steckman – Business
Kristin Taylor – Fine Arts
Beth Thompson – French
Glen Wegge – Leadership

Instructional/Supervisory Staff Qualifications: Staff reviewed approximately 40 vitae posted on the College's website for its Assistant, Associate, and full Professors. All appear to have educational and/or experiential qualifications for their assignments. The majority of faculty have terminal degrees. Of those with graduate degrees, all have a significant history of teaching and/or other pertinent, professional experience. Of 53 online faculty members, 21 hold terminal degrees, and the remainder have, at a minimum, at least one graduate degree. The Director of the Online Programs is in the process of completing a doctoral degree in education with an emphasis on organizational management.

Staff took particular note of the collective credentials of the 6 online faculty who are teaching courses in the online fire science administration program: graduate degrees in fire science, emergency services administration, executive fire service leadership, public administration, criminal/social justice administration, human resources management, occupational safety and health engineering; professional certifications in the operation of fire equipment, fire service instruction, rescue operations, hazardous materials, and evidence collection; professional experience as a fireman, fire chief, fire inspector, peace officer, emergency medical paramedic, and zoning commissioner. Staff also notes that three out of the four online faculty teaching criminal justice courses have a juris doctor, and that the College employs an instructor with a juris doctor to teach courses in business law, criminal law, constitutional law, and legal aspects of fire protection.

Commitment to Iowa Students and Teach-Out: The College's registration application includes a written statement from President Robert Alsop affirming the College's commitment to students and the delivery of Waldorf's degree programs, both on campus in Forest City, Iowa, and online. Dr. Alsop states that in the unlikely event of institutional closures, student welfare would be the College's primary concern. For residential students, Waldorf would establish a teach-out plan with Grand View University, providing the opportunity for students to complete their courses of study at a private institution in Iowa. For online students, Waldorf would establish a teach-out plan with Columbia Southern University. For students interested in transferring elsewhere, Waldorf College would be dedicated to assist with the transfer process to ensure the well-being of each student. Teach-out coordination and transfer services would be led by Waldorf's Vice President for Academic Affairs and the Registrar, with assistance from students' faculty advisors.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Staff approved the College's financial responsibility application, which includes a continuous corporate surety bond payable to the State of Iowa in the amount of \$50,000, issued by Merchants Bonding Company (Mutual).

Effective July 1, 2012, new revised Iowa Code Section 714.24, subsections 1 and 2, require a school that is governed by the financial responsibility provisions of Iowa Code Sections 714.18 to renew evidence of financial responsibility, at minimum, every two years. This renewal may occur at the same time the College applies for registration renewal, which is also now on a 2-year cycle.

Section 714.23 – State Tuition Refund Policy

Staff at Waldorf College worked with Commission staff to develop a tuition refund policy that complies with Iowa Code Section 714.23. For both residential and online students, the tuition refund formula that Waldorf adopted applies to all of its students regardless of whether they are Iowa residents. Its policy for residential students provides a greater tuition refund than required by Iowa Code.

Chapter 261F - Educational Loan Code of Conduct and Preferred Lender Arrangements

Waldorf College complies with Iowa Code Chapter 261F by posting on its website an education loan Code of Conduct for its employees <http://www.waldorf.edu/Residential/Future-Students/Tuition---Financing/Financial-Aid/Institutional-Code-of-Conduct-for-Education-Loans>. The College uses a Model Code of Conduct developed by the Commission in consultation with the Iowa Attorney General's Office for this purpose.

Iowa Code Chapter 261F also stipulates certain conditions that must be met by a covered institution (i.e., a state or federal student aid recipient such as Waldorf College) that participates in a preferred lender arrangement. A preferred lender arrangement under Iowa Code means an arrangement or agreement between a lender and a covered institution under which the lender provides or otherwise issues educational loans to borrowers and which relates to the covered institution recommending, promoting, or endorsing the educational loan product of the lender.

Waldorf College does not maintain a list of preferred lenders. However, the financial aid office at the College does refer students to a list of lenders that Waldorf College students have used in the past, commonly known as a "historical lender list." Under federal Department of Education guidance, an institution is not considered to be participating in a preferred lender arrangement if it provides borrowers with a neutral, *comprehensive* list of private education lenders that have previously made loans for attendance at a school within a specified time period. Such a list must be accompanied by a statement that the borrower may choose any lender. A school is prohibited from recommending or endorsing any of the lenders on the list, and under federal Department of Education regulations, the school must provide disclosures to students about the terms and conditions of loans made by the lenders on its historical lender list. After consultation with the Iowa Attorney General's office, staff determined that a historical lender list is an acceptable alternative to provide students with information about lending options and that it is not considered a preferred lender list under Iowa Code Section 261F, provided the school complies with the federal Department of Education's guidance on the use of such a list.

IOWA COLLEGE STUDENT AID COMMISSION

Columbia Southern University Registration Application March 2013

RECOMMENDED ACTION:

Approve Columbia Southern University's registration request.

As a condition of registration:

- By the beginning of the fall 2013 term, the College must develop, implement, and provide staff with a copy of a policy that complies with new Iowa Code Section 261.9(1)"h" (as enacted by Iowa Senate File 2225).

Note: Iowa Code Section 261B.3, generally effective July 1, 2012, reduces the registration term from 4 years to 2 years, effective July 1, 2012. All schools that the Commission approves for initial or renewal registration after July 1, 2012, will be registered for a term of 2 years.

Registration Purpose

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 (effective July 1, 2012) require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this state or if the school otherwise has a presence in this state. Presence means a location in Iowa at which a student participates in any structured activity related to a school's distance education course of instruction. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations. Iowa Code Section 261B.2, subsection 4, paragraph "a" exempts occasional and short-term recruiting activities for the school's residential courses of instruction. However, similar recruiting activities at an Iowa location for a school's *online* programs are *not* exempted. Staff required Columbia Southern University to register in Iowa because the University employs Iowa-resident adjunct faculty who work remotely for the school from their Iowa home or other Iowa location; and the University wishes to promote its online programs at an Iowa location(s). At this time, the University does not have an Iowa-based recruiter.

Institutional Information

Columbia Southern University is an exclusively online postsecondary educational institution whose primary administrative offices are located at 21982 University Lane, Orange Beach, Alabama. The University also maintains administrative offices at 25326 Canal Road, Orange Beach, Alabama. The University's Chief Executive Officer is Robert G. Mayes, Jr., at the same address. Columbia Southern University is registered as a foreign for-profit corporation #440048 with the Iowa Secretary of State. The University's registered agent in Iowa is National Registered Agents, Inc., 604 Locust St. Suite 222, Des Moines, IA 50309.

In addition to University CEO Robert G. Mayes, Jr., persons or entities owning more than 10% of the school are:

- Minnie L. Mayes, 18 Preserve Court, Gulf Shores Alabama
- Chantell M. Cooley, 407 Peninsula Boulevard, Gulf Shores, Alabama

Columbia Southern University is the sister school, and part of the parent organization of Waldorf College located in Forest City, Iowa. Columbia Southern University's legal governing body is its nine-member Board of Trustees. Columbia Southern University's CEO Robert G. Mayes, Jr., Mrs. Minnie Mayes, and Ms. Chantell Cooley serve on the Board of Trustees for both Columbia Southern University and its sister school Waldorf College in Iowa. Otherwise, there is no overlap in membership of the Board of Trustees between Columbia Southern University and Waldorf College.

Columbia Southern University maintains partnerships for acceptance of transfer credits with the following:

- Waldorf College, Forest City, Iowa
- The University of North Alabama, a regionally accredited, public university (for an online Master of Business Administration program)
- Capella University, a private, regionally accredited, Iowa-registered distance education provider. Graduates of Columbia Southern University may be granted up to 88 undergraduate credits, 8 graduate credits or 32 Ph.D. credit hours toward a Capella University program.
- Eastern Iowa Community College, an Iowa public community college. Health Safety and Technology program graduates at EICC are granted entrance into the Columbia Southern University occupational health and safety and environmental management programs.
- South Central College, a public, regionally-accredited college in Minnesota. Graduates of South Central College's Occupational Safety and management program may enroll in the Columbia Southern University Occupational Health and Safety program. SCC graduates and employees, including spouses and children, will also receive a 10% tuition discount.
- Trinidad State Junior College, a public regionally-accredited community college in Colorado. Graduates of the Trinidad state Junior College occupational safety and health program are granted entrance into the Columbia Southern University Occupational Safety and Health program.
- Northcentral University, a private, regionally-accredited university in Arizona. Columbia Southern University graduates seeking enrollment in the Northcentral University's doctorate programs will receive a 10% tuition discount not to exceed \$2,000.
- Masters International School of Divinity, an online entity that is *not* accredited by an accrediting agency recognized by the federal Department of Education. Students enrolled in a program at Masters International may take courses at Columbia Southern University that count as credit toward program completion at Masters International. Columbia Southern University MBA or Master of Science graduates will receive a 10% tuition discount up to \$2,000.

Physical Facilities: Not applicable, since Columbia Southern University has applied for registration exclusively to offer distance education programs to Iowans.

Accreditation: The University is accredited by the Distance Education and Training Council, a national accrediting agency recognized by the federal Department of Education.

Federal Stafford Loan Cohort Default Rate (FFY 2010): 3.6%. For comparison purposes, the FFY 2010 national average cohort default rate is 9.1%.

Graduation Rate: 39%. 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.

Average Loan Debt upon Graduation: For students graduating from CSU in 2010-2011, the average loan debt was \$48.38 and for students graduating from CSU in 2011-2012, the average loan debt was \$15.96. Only one-third of the University's student population used some type of federal student aid, and of that one-third, many only use grant funds and therefore have no loan debt.

Record Preservation: The University stores all student records and documents within the Student Information system, Omega. The database contains detailed records of every assignment, course, enrollment, contact notes, transfer credit, and transcripts on file. All paper documents are scanned into this system and retained indefinitely, and are part of the student's record. The University is in the process of scanning and storing all student records in paper files and destroying the backup paper files in accordance with federal and state guidelines. In the interim, the backup paper files are stored in a locked storage room. Access to Omega is controlled by several security measures. Users must authenticate and have permission on the network to run the Omega software. Staff must have a user account and password to log into Omega. The system uses role-based permissions to grant access to different areas.

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

Registrar Rachel Farris
Columbia Southern University
21982 University Lane
Orange Beach, AL 36542
(251) 981-3771, ext. 6526

The University provides an online transcript request form that may be downloaded, signed and submitted to the University via fax or mail at <http://www.columbiasouthern.edu/downloads/pdf/form/transcript-request>.

Instructional Methodology: Columbia Southern University provides instruction inclusively online through the internet. The University utilizes the Blackboard learning platform to deliver course curriculum. The University incorporates labs, Skype, and Wimba into Speech courses to provide speaking opportunities. Several courses within the core offerings of the College of Arts and Sciences utilize labs created and implemented through the Pearson publishing company. Multimedia resources are provided in many courses and include narrative presentations, self-assessments, and external resources. The University provides asynchronous learning opportunities for students. The two enrollment systems offered are the Term Enrollment system, i.e., 8 weeks with set start and end dates, and the per-course/open enrollment system, i.e., 10 weeks with no pre-determined semester or session dates.

Students that use Federal Student Aid or Veterans Administration benefits to finance their education must enroll in the 8-week term-based program structure. The University offers all of its programs in this

format. Groups of students (i.e., cohorts) who enroll in the term-based structure will begin a course of study together and proceed through the program on the same timeline. The University permits cohorts of students to begin attendance in the term-based structure once per month. Students must submit discussion board postings in term courses.

Students that enroll in the 10-week per course structure may begin a course at any time. There are no predetermined semester or session dates. After the first enrollment, students may take one course after another or multiple courses simultaneously. The University executed an enrollment agreement with the student for each course. Courses are designed in an independent study model and are 10 weeks in length. A student must complete the requirements of each course 10 weeks after it begins.

Student Learning Resources: The Columbia Southern University online library permits students and faculty to access, through the student portal “myCSU,” a collection of online research materials selected to meet the needs of University professors and students. These materials are primarily contained in two sources: research databases and the “ebrary.” The University library subscribes to research databases that provide hundreds of thousands of current full-text periodical articles, including articles from peer-reviewed journals, covering each of the programs of study at the University. The library also subscribes to specific scholarly e-journals that augment the database content. The ebrary provides access to a collection of more than 70,000 titles from all academic subjects’ areas. Some of the publishers represented in the collection are Oxford, Informa Healthcare, Harvard University Press, Wiley, MIT, and Environmental Law Institute. The CSU Online Library does not participate in any formalized agreements with other libraries. The experienced staff is comprised of a professional librarian with an MLIS degree and two library assistants holding degrees in education. To facilitate the use of the University’s collection of research materials, library staff provides assistance to students who have immediate access to a library staff member during the following hours of service: Monday – Thursday 8 am – 11 pm (Central Standard Time), Friday 8 am – 3 pm, and Sunday 3 pm – 11 pm. Students are charged a one-time, online library fee of \$20. Graduate and Doctorate programs include a mandatory orientation course that provides students with information about online library access.

Columbia Southern University also maintains a Student Success Center that provides proactive advisement and coaching for new and continuing students to support their academic goals. The Success Center includes a Writing Center, a Math Center, Career Services and the office of Disability Services. Tutoring services in writing and math are available at no cost to students. Monday – Thursday from 8 am to 5 pm, and on Friday 8 am – 3 pm.

Curriculum Evaluation and Development: University faculty are involved in the course writing process in three distinct ways: front-end analysis, the course writing phase, and the curriculum evaluation. Each of these phases involves significant faculty participation and input regarding course content. During the front-end analysis, faculty provide information about student and professor issues, beneficial course materials, resolutions to deficiencies in the course, and any other noteworthy items. These topics are taken into account and evaluated during the course writing process. During this process, a faculty member or subject matter expert writes the course in conjunction with an instructional designer who assists in establishing a blueprint for the course and aligning objectives to program learning outcomes. In the final phase of the course writing process, the faculty member who writes the course completes a curriculum evaluation report describing why he or she supports the course materials. A second faculty member completes a curriculum evaluation report to support or refute the course materials and provide any necessary improvements.

The University is evaluating a new 15-step curriculum program process. Nomination of a new program at Columbia Southern University can come from any source but must enter the formal development process at the Vice President for Academic Affairs (VPAA) level where the VPAA initiates the process. After the VPAA initiates the process, new curriculum is reviewed by the Department Curriculum Committee, University Curriculum Committee, and Office of the Provost, with final approval provided by the President, and Board of Trustees. The VPAA has oversight responsibility to ensure process integrity. The Dean of Instructional Design and Course Maintenance is responsible for curriculum development project management in conjunction with the academic Program Director. Once final approval has been received from the Board of Trustees, proposed programs are then submitted to Alabama Department of Postsecondary Education and the Distance Education and Training Council, our accrediting body. Once approval from the State and the Accrediting Commission of the Distance Education and Training Council (DETC), the new program is placed in the university catalog and may begin receiving students. Any current curriculum deemed a substantive change as defined by DETC enters the 15 step process. Typically, a change of less than 25% would be initiated by the Program Director and approved by the VPAA. Currently, the VPAA position is vacant and all academic program changes are under the supervision of the Provost as Chief Academic Officer.

Student Complaints Process: The University discloses its process for handling student complaints of a non-academic nature on its website at <http://www.columbiasouthern.edu/About-CSU/Accreditation/Registering-a-Complaint>. Students are encouraged to resolve concerns about administrative policies or operations in an informal setting through direct discussion with the individual or office involved. If a student's concern is not resolved through informal discussion, a student who wishes to file a complaint should contact his/her Student Services Representative for assistance. The University will research the complaint and the student will be notified of the resolution within three calendar days. If the student has proceeded through the University's process for filing a complaint and has not received resolution, the University provides information about registering a complaint with its accrediting agency, the Distance Education and Training Council, and the individual state agencies with jurisdiction in the student's state of residence.

Programs Offered In Iowa

Online programs that Columbia Southern University offers to Iowa residents are listed below. Estimated total cost of tuition and fees for the **entire program** are provided for each program.

Note regarding textbooks: Textbooks are provided at no cost by the University. However, if a student drops, withdraws, or fails a course, a charge for the textbook and shipping will be posted to the student's account. These additional charges are not included in the program cost estimates below. Students may return the text within 30 days to have the charge reversed, or the student may re-enroll in the same course within 30 days and indicate on the course retake form that the student will use the previously provided text.

Doctoral Degree Program

- Doctor of Business Administration - \$18,420

Graduate Degree Programs

- Master of Science in Criminal Justice - \$9,925
- Master of Science in Emergency Services Management - \$9,925

- Master of Science in Occupational Safety and Health - \$9,925
- Master of Science in Organizational Leadership - \$9,925
- Master of Business Administration - \$9,925

Graduate Certificate Programs (these programs are not eligible for federal student aid)

- Environmental Management - \$3,240
- Finance - \$3,240
- Health Care Management - \$3,240
- Human Resource Management - \$3,240
- Marketing - \$3,240
- Occupational Safety & Health - \$3,240
- Project Management - \$3,240
- Public Administration - \$3,240

Baccalaureate Degree Programs

- Bachelor of Science in Business Administration - \$24,120
- Bachelor of Science in Criminal Justice Administration - \$24,120
- Bachelor of Science in Environmental Management - \$24,120
- Bachelor of Science in Fire Science - \$24,120
- Bachelor of Science in Health Care Administration - \$24,120
- Bachelor of Science in Human Resource Management - \$24,120
- Bachelor of Science in Information Technology - \$24,120
- Bachelor of Science in Occupational Safety & Health - \$24,120
- Bachelor of Science in Psychology - \$24,120

Associate Degree Programs

- Associate of Arts in General Studies - \$12,120
- Associate of Applied Science in Business - \$12,120
- Associate of Applied Science in Criminal Justice - \$12,120
- Associate of Applied Science in Fire Science - \$12,120
- Associate of Applied Science in Occupational Safety & Health - \$12,120

Undergraduate Certificate Programs (these certificate programs are not eligible for federal student aid)

- Environmental Management - \$2,460
- Finance - \$2,460
- Fire Science - \$2,460
- Hospitality and Tourism - \$2,460
- Human Resource Management - \$2,460
- Industrial Hygiene Management - \$2,460
- Information Technology - \$2,460
- International Management - \$2,460
- Management - \$2,460
- Marketing - \$2,460

- Occupational Safety & Health - \$2,460
- Project Management - \$2,460
- Sport Management - \$2,460

Registration Compliance

As required by Iowa Code Section 261B.4, Columbia Southern University disclosed its tuition refund policy for withdrawn students. Since it is a for-profit institution, its tuition refund policy for withdrawn students must comply with the provisions of Iowa Code Section 714.23. The University submitted a draft of its revised refund policy for Iowa resident students, which is compliant with Iowa Code, provided the University does not charge a withdrawn student a flat fee that is a percentage of tuition as it does for other students. Business Affairs, who processes withdrawals, is working with the University's IT department to set up exceptions when processing withdrawals for Iowa residents and a state of residence field is being added to the University's database to alert staff of special policies across states at the time of withdrawal. The University will disclose its Iowa tuition refund policy at <http://www.columbiasouthern.edu/Financial/Refund-Policies> and on the University's state disclosure page at <http://www.columbiasouthern.edu/About-CSU/Accreditation/State-Licensure>. The University will provide information in its catalog about how students may access this Iowa-specific information at the above links.

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. Columbia Southern University maintains these policies and discloses them to students on its web site at <http://www.columbiasouthern.edu/Financial/Office-of-Financial-Aid/Consumer-Information/-security-policy>.
- Iowa Code Section 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. The University provided a draft of this policy that it is prepared to implement upon registration approval. Business Affairs, who processes withdrawals, is working with the University's IT department to set up exceptions when processing withdrawals for Iowa residents and a state of residence field is being added to the University's database to alert staff of special policies across states at the time of withdrawal. The University's state disclosure page at <http://www.columbiasouthern.edu/About-CSU/Accreditation/State-Licensure>.
- Iowa Senate File 2225 created a new Iowa Code Section 261.9(1)(h). This new 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 new policy now applies to Iowa's registered schools. Staff request that the Commission waive enforcement of this new rule as it relates only to registration qualifications for the same delayed enforcement period that staff have granted to Iowa's own schools for the purpose of qualifying for state-based student financial aid, i.e., until the fall of 2013. Schools that are scheduled for registration consideration during the waiver period will be expected to develop and implement a policy that complies with new Iowa Code Section 261.9(1)(h) by the end of the waiver period.

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

- <http://www.columbiasouthern.edu/Download-Catalog>
- <http://www.columbiasouthern.edu/downloads/pdf/form/term-enrollment>
- <http://www.columbiasouthern.edu/downloads/pdf/partners/per-course-enrollment-agreement-ccl>

Columbia Southern 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 currently discloses its status with the Commission and the Commission's contact information for student complaints at

- <http://www.columbiasouthern.edu/About-CSU/Accreditation/State-Licensure>
- <http://www.columbiasouthern.edu/About-CSU/Accreditation/Registering-a-Complaint>

Financial Responsibility: Columbia Southern University submitted an audit report dated June 25, 2012, for its parent company, Columbia Southern University, Inc., and Subsidiaries and CSU Properties, LLC, for the fiscal year ending December 31, 2011, conducted by the independent auditing firm Weworski & Associates. The auditing firm expressed its unqualified opinion that the University's financial statements present fairly, in all material respects, its financial position.

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 independent auditing firm that audited Columbia Southern University, Inc. did not report or test a composite score. The most recent composite score available from the federal Department of Education for Columbia Southern University is 3.0.

The federal Department of Education restricts the portion of a for-profit institution's income that may be derived from federal student aid funding to 90%. The independent auditors tested the 90/10 ratio for Columbia Southern University and reported that the percentage of revenue the University earned from Title IV aid during the fiscal year that ended on December 31, 2011 was 39.13%.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Columbia Southern University employs a full-time, Iowa-based Curriculum Coordinator, Teresa Davis, whose official domicile is the location of its sister-school, Waldorf College, at 106 S. 6th St., Forest City, Iowa.

In addition, Columbia Southern University employs the following Iowa-resident adjunct faculty, who work remotely for the school from the employee's Iowa home or other Iowa location and provide instruction in the following subject matter areas:

- Bob Elsbury – Basic Mathematics
- Julie Hirschboeck – English and Literature
- Carol Jensen – Doctor of Business Administration, MBA and Graduate Orientation
- Jeffrey Pilz – American Military History
- Cynthia Ryder – Doctor of Business Administration Research and Graduate Orientation
- James Withers – Bachelor of Science in Occupational Safety and Health

Of the six Iowa-resident faculty members listed above, four possess a doctoral degree, including those who are teaching at the doctoral level, and the remaining two have a graduate degree.

Instructional/Supervisory Staff Qualifications: Staff reviewed web-based disclosures listing the names and educational credentials of hundreds of University faculty in the following three University Colleges:

- College of Arts and Sciences – Of approximately 130 faculty members, 47 possess a terminal degree in areas that include education, school administration, english, literature, agricultural sciences, communications, mathematics, education, forestry, history, counseling, political science, psychology, medicine and law.
- College of Business – Of approximately 130 faculty members, 90 possess a terminal degree in areas such as law (8), organization management or leadership, human resource management, hospitality and tourism management, business administration, sports management, public administration, computer science, health science, e-business, curriculum and instruction, information technology, economics, mathematics, education, marketing, industrial engineering and management, finance or accounting, higher education leadership, applied technology and performance improvement, and public affairs. The remaining approximately 40 faculty possess a graduate degree, 18 of which are Masters of Business Administration.
- College of Safety and Emergency Services – Of approximately 95 faculty, 43 possess a terminal degree in areas such as law (9), organizational leadership, administration, sociology, civil engineering, psychology or forensic psychology, industrial hygiene, industrial engineering, pharmacology and/or toxicology, public health, public safety, emergency management, criminal justice, ecology, homeland security, water resource engineering, and curriculum and instruction. The remaining faculty possess a graduate degree, including in business administration, criminal justice, fire sciences, fire protection and administration, homeland security, industrial safety, and pollution control.

Commitment to Iowa Students and Teach-Out: The College's registration application includes a written statement from President Robert Mayes affirming the University's commitment to students and the delivery of Columbia Southern University (CSU)'s online degree programs. Mr. Mayes states that in accordance with the Distance Education and Training Council (DETC), all students who enroll in CSU academic programs will receive education in accordance with the terms and conditions of their

enrollment contract and have the opportunity to complete their programs in the unlikely event of an institutional closure. In the event that CSU discontinues an academic program, students will be included in an academic completion period. In the event that the university closes prior to student study completion, the University will work with DETC to establish a teach-out plan.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Staff approved the College's financial responsibility application, which includes a continuous corporate surety bond payable to the State of Iowa in the amount of \$50,000, issued by Western Surety Company.

Effective July 1, 2012, new revised Iowa Code Section 714.24, subsections 1 and 2, require a school that is governed by the financial responsibility provisions of Iowa Code Sections 714.18 to renew evidence of financial responsibility, at minimum, every two years. This renewal may occur at the same time the College applies for registration renewal, which is also now on a 2-year cycle.

Section 714.23 – State Tuition Refund Policy

Staff at Columbia Southern University worked with Commission staff to develop a tuition refund policy for Iowa-resident online students that complies with Iowa Code Section 714.23. This policy will be implemented for students who withdraw on and after the date of the University's registration.

IOWA COLLEGE STUDENT AID COMMISSION

Kaplan University Application for Amendment to Voluntary Postsecondary Registration March 2013

RECOMMENDED ACTION:

Approve Kaplan University's request to amend its voluntary registration by closing its Council Bluffs, Iowa, location.

Amendment Purpose

Kaplan University was initially, voluntarily registered to operate in Iowa on November 16, 2012, in order to comply with federal regulations in 34 CFR 600.9 that require a school participating in the federal student aid programs to be authorized, by name, as a postsecondary educational institution in the state in which it is located.

On November 27, 2012, Kaplan University staff and its President Wade Dyke met in person with Commission staff and its Executive Director to notify the Commission of an anticipated change in location, i.e., the closure of its Council Bluffs, Iowa, location. Iowa Code Section 261B.3, subsection 2, states that registrations shall be renewed every two years and shall be amended upon any substantive change in location, program offering, or accreditation. Staff therefore required Kaplan University to submit a registration amendment to formally acknowledge closure of its Council Bluffs location.

Kaplan University provided the following information about plans it initiated to assist students who would be impacted by closure of its location in Council Bluffs:

- Council Bluffs' students were notified of the University's closure plan in November of 2012 via e-mail and telephone. The Council Bluffs students were immediately assigned to and contacted by academic advisors at its Omaha, Nebraska location. The University's plan called for administrative and instructional support for the Council Bluffs' students to be assumed by its Omaha location. The Omaha campus held two open houses to welcome the Council Bluffs' students. Of the 180 students enrolled in Kaplan programs through the Council Bluffs location, 70% were receiving their education solely online or through a blended format, which limited disruption for students impacted by the change. The Omaha campus offers a wider variety of programs and classes, permitting Council Bluffs' students to continue receiving instruction in their choice of program. Students enrolled through the Council Bluffs' campus were permitted to choose the format in which the student wished to continue receiving instruction through the Omaha campus.
- The last day of class on site at the Council Bluffs location was February 21, 2013.
- The last day of work for all employees at the Council Bluffs location was February 27, 2013. Several staff at the Council Bluffs location were able to transition to other Kaplan University positions.
- Financial aid, academic and financial records, and student support services for Council Bluffs students are now managed through the Omaha, Nebraska location.

- The University's Council Bluffs location is 23 miles away from its location in Omaha, Nebraska. The University provided Council Bluffs' students with two \$50 gas cards for each ten-week term to compensate for any additional travel.
- Former Council Bluffs' students who were Iowa Tuition Grant (ITG) recipients are no longer eligible for the Iowa Tuition Grant after their transfer to Kaplan's Omaha, Nebraska location. However, these students will receive an institutional scholarship from Kaplan for the exact amount of the student's prior ITG award until the student withdraws or completes his or her program.

Additional Program

At this time, Kaplan University also requests to add to its registration an online Juris Doctor program offered by the University's Concord Law School. Chapter 31 of Iowa Court Rules require an initial attorney licensure applicant to have completed a Juris Doctor program that is fully accredited by the American Bar Association (ABA). Currently, the ABA does not accredit distance education programs; therefore, a graduate of the University's Juris Doctor program does not qualify for initial licensure as an attorney in Iowa. Kaplan University currently discloses to prospective students on its website that completion of this online program qualifies a student for the bar examination and potential licensure as an attorney **only** in the State of California. However, at the request of Commission staff, the University designed a "JD Student Disclosure Statement Iowa-Specific Disclosures" document that must be signed by an Iowa resident who is admitted into the Concord Law School's Juris Doctor program. This document prominently states, "*Iowa residents acknowledge receipt of this notice that the J.D. degree from this law school does not satisfy the legal education requirements for admission to practice law in Iowa.*" The University also, at the Commission's request, has enhanced its web-based disclosures about career outcomes to provide additional, bona fide information about how a Juris Doctor may be an enhancement for persons pursuing other career opportunities.

Tuition and Fees

Kaplan discloses tuition and fee charges for its online Juris Doctor program at <http://info.concordlawschool.edu/Pages/Tuition.aspx>.

IOWA COLLEGE STUDENT AID COMMISSION

University of Maryland University College Application for Postsecondary Registration in Iowa March 2013

RECOMMENDED ACTION:

Approve the registration application for the University of Maryland University College with a waiver of the Iowa resident, full-time faculty member/program coordinator requirement of administrative rules.

As a condition of registration, the University must notify staff, per Iowa Code Section 261B.5, within 90 days of the University's approval of any Iowa location at which an online degree candidate will participate in a structured field experience.

Note: Iowa Senate File 2267 enacted a change in Iowa Code Section 261B.3 that reduces the registration term from 4 years to 2 years, effective July 1, 2012. All schools that the Commission approves for initial or renewal registration after July 1, 2012, will be registered for a term of 2 years.

Registration Purpose

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 (effective July 1, 2012) requires a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this state or if the school otherwise has a presence in this state. In part, presence means a location in Iowa at which a student participates in any structured activity related to a school's distance education course of instruction. The University of Maryland University College (UMUC) applied for registration because it offers certain distance education programs that require a structured field experience, in which an Iowa resident would participate at an Iowa location. The University also employs adjunct faculty who provide instruction in its online programs remotely from the employee's Iowa home or other Iowa location.

Institutional Information

The University of Maryland University College is a public institution located at 3501 University Boulevard East, Suite 3115, Adelphi, Maryland. The College also maintains branch campuses in Japan, Germany, additional locations in Virginia, the District of Columbia, and additional locations or instructional sites at hundreds of military bases in Australia, England, Europe, Guam, the Middle East, and Asia. The College's Chief Executive Officer is President Javier Miyares, at 3501 University Boulevard East, Adelphi, Maryland. The University has no Iowa contact person since it is a distance education registration applicant. The University is not required to register with the Iowa Secretary of State as a corporation doing business in Iowa and designate an Iowa resident agent since it is an instrumentality of a state.

Physical Facilities: None in Iowa.

Accreditation: The College is accredited by the Middle States Commission on Higher Education, a regional accrediting agency recognized by the federal Department of Education.

Other Approvals: The Iowa Board of Education approved the University to offer its online Master of Arts in Teaching program to Iowa residents, which prepares students for licensure as a secondary school teacher. The Iowa Board of Education's approval only qualifies the University to offer this program under its Iowa registration; it does **not** qualify an Iowa-resident graduate to obtain an initial license to teach in Iowa. Graduation from this program entitles a candidate to be recommended for Maryland Teaching Certification in a specific subject area. An Iowa-resident graduate of this program must then apply to the Iowa Board of Educational Examiners for an Iowa teacher's license. The Iowa Board of Educational Examiners evaluates candidates for Iowa licensure who completed out-of-state educator preparation programs on a case-by-case basis.

Federal Stafford Loan Cohort Default Rate (FFY 2010): 5.5%. For comparison purposes, the FFY 2010 national average cohort default rate is 9.1%.

Graduation Rate: 12%. 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 College discloses that only 2% of its entering students were considered "full-time, first-time" in 2011.

Average Loan Debt upon Graduation: For undergraduate students, \$12,934.

For its graduate students, the University is required by the federal Department of Education to calculate median loan debt upon graduation only for its graduate-level, "gainful employment" certificate programs. Although these are not degree programs, often students who are enrolled in a degree program pursue a certificate concurrently. Therefore, the following data reflects, in many cases, loan debt incurred by a student for the graduate certificate program identified below, *and* for a concurrent graduate program:

- Accounting - \$15,972
- Financial Management in Organizations - \$31,773
- Nonprofit and Association Financial Management - \$58,546
- Biotechnology Management - \$77,362
- Acquisition and Supply Chain Management - \$19,326
- International Trade - \$33,084
- Leadership and Management - \$34,838
- Foundations of Cybersecurity - \$20,500
- Cybersecurity Technology - \$17,039
- Criminal Justice Management - \$41,000
- Distance Education Leadership - \$22,849
- Foundations of Distance Education and E-Learning - \$20,136
- Library & Intellectual Property in Distance Education and E-Learning - \$30,750
- Teaching and Training at a Distance - \$44,912
- Environmental Management - \$34,648
- Chief Information Officer - \$30,500
- Health Care Administration - \$52,429
- Homeland Security Management - \$55,784

- Information Assurance - \$34,298
- Foundations of Human Resource Management - \$28,180
- Database Systems Technology - \$14,500
- Foundations of Information Technology - \$50,556
- Systems Analysis - \$35,756
- Telecommunications Management - \$16,447
- International Marketing - \$62,394
- Public Relations - \$31,625
- Project Management - \$32,045

Record Preservation: UMUC has designated its Office of the Registrar to maintain student records. Official records are retained permanently and kept within the Office of the Registrar at UMUC's headquarters in Adelphi, Maryland. The Registrar stores official records in various protected physical and electronic mediums, including microfiche, microfilm, compact disc, and in PeopleSoft, a data management application. In the unlikely event of institutional closure, the Secretary of Higher Education of the State of Maryland will hold the student records of UMUC.

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

Registrar's Office/Transcripts
 University of Maryland University College
 3501 University Blvd. East
 Adelphi, MC 20783-8075 USA
 Fax: 240-684-2005 or 240-684-2006

Record requests may be made through UMUC's student web portal, by submitting a paper form, or by contacting the Office of the Registrar directly. Instructions for requesting a transcript through the student portal, and additional information about transcript requests for students who attended UMUC Asia or UMUC Europe is located at

<http://www.umuc.edu/students/support/records/transcripts/index.cfm>

Instructional Methodology: Online. UMUC's online course format is WebTycho, an interactive, Web-based course management system. WebTycho is a customized program developed by UMUC to facilitate course delivery via the World Wide Web. WebTycho works in conjunction with a web browser to provide an interactive classroom experience to more than 88,000 concurrent UMUC students and faculty around the United States and the world. Major functions of WebTycho include syllabus and course content for instructors to deliver material; assignment folder for students to hand in personal work; conferencing for class-wide asynchronous discussion; study groups for small group work, and chat for real-time interaction. Course content, texts, requirements, assignments, and class participation are comparable for online and on-site courses. Any given online course maintains the same intended learning outcomes. Supporting WebTycho functions include Reserved Readings (faculty-selected, ready-only, copyrighted material), Library access, Webliography (websites posted by all class members), private messaging, portfolio (documentation of individual activity), class members (e-mail director, robust text creation tools, and faculty center (creation tools for faculty only).

Student Learning Resources: UMUC's interactive, Web-based course management system also permits online students access to all UMUC on-site services, including the library, clubs and societies, Career Services, the Effective Writing Center, mentoring for undergraduate students and for graduate students enrolled in the Master of Arts in Teaching program, free tutoring in math, statistics and select

other undergraduate courses. UMUC phone representatives are available 24/7 to provide answers to general questions and help students navigate UMUC's web site. Representatives also ensure that students are on the UMUC mailing list to receive upcoming class schedules, open house invitations, and other important announcements. Students may access financial, academic, and other personal records through the student portal. Students may order required textbooks and software for all courses online through the UMUC Virtual Bookstore or by mail. Students are guaranteed availability of new and used inventory, discounts for online sales, no sales tax, and an easy return and buyback program. Orders are shipped within 24 hours of receipt. Technical support is available to students 24/7 via web or by telephone.

Library services are available to online students at <http://www.umuc.edu/library/index.cfm>. Students may access an extensive array of subscription research databases containing tens of thousands of full-text articles, as well as thousands of electronic books. The library has created subject-specific resource guides to serve as a jumping-off point for research. Each guide includes subject-relevant research databases, books, web sites and, as applicable, other web-based technologies. Currently enrolled students in the continental United States have borrowing privileges at the 16 University System of Maryland and affiliated institutions. All UMUC students may use the Document Express service to request that journal articles or book chapters not available online in full text be sent to them electronically. Students may obtain individualized research assistance by contacting Information and Library Services or by visiting the Peck Virtual Library Classroom within the student portal. Reference and research assistance is available 24/7 through the library web site under Ask a Librarian.

Curriculum Evaluation and Development: Each academic program (undergraduate and graduate) must conduct an academic program review every five years under guidelines that ensure analysis of these elements and aspects:

- Relation of program to UMUC mission
- Specific degrees and credentials available within the program (specialization for the associate's degree, major or minor for the bachelor's degree, or certificates)
- Relation of program to overall curriculum (i.e., general education and major requirements)
- Relation of program to intended market and employer needs
- Geographic range of program (i.e., availability in all divisions)
- Procedures for establishing new programs or suggesting change to existing programs covered in UMUC
- Size of program (overall and by division)

Verifiable data such as enrollments, degrees earned, course evaluation results, grade distributions, faculty demographics, and survey results are used to analyze the program. Other verifiable data such as research on employment trends in the field, department surveys, information from the WebTycho "999" faculty classrooms, and projected class schedules may be included. Information about decision-making processes and curriculum development procedures as well as descriptions of curriculum changes and the assessment of how differences in geographic location may affect the program (e.g. relative availability of lower-level or upper-level courses) are also used.

Program assessment and evaluation are the final areas of emphasis in the academic program review and include the mandate to "explain the academic and professional standards that help guide the program and how the curriculum is measured against such standards." The evaluation examines accreditation standards, guidelines from professional or academic groups, descriptions of learning outcomes, program goals and objectives, as well as a description of the competencies identified for

formal assessment. UMUC values the perspective and contributions of external evaluators in this process and has incorporated such reviewers in accordance with USM Board of Regents expectations.

No new courses or programs can be added to the curriculum without worldwide approval at several levels. The undergraduate Curriculum Committee leads the review of all materials. Only upon agreement of this committee will curriculum changes be brought forth to the Provost's Office and then to the USM. In the Graduate School, course development takes place within individual departments and is then brought to the Graduate Council for approval.

Student Complaints Process: Students who wish to seek redress for the acts or omissions of a respondent must first request a conference with the respondent and attempt to resolve the complaint informally within 14 calendar days of the alleged act or omission. If a satisfactory resolution is not reached, the student may file a formal complaint in writing to the administrator within 30 calendar days of the alleged act or omission. (If a Student Grievance is filed against the administrator, the formal complaint may be filed with the Provost.) Upon receipt of the complaint, the administrator will immediately inform the respondent, in writing, of the alleged act or omission. Within 30 calendar days of receipt of the complaint, the administrator or his designee will conduct a preliminary administrative inquiry. All material reviewed will be considered confidential and shared only with those with a need to know. The administrator or designee(s) may communicate with the respondent and give the respondent the opportunity to present any relevant evidence. The administrator will dismiss the complaint if the student has failed to comply with procedure or if there is no evidence of the alleged act or omission based upon the inquiry. The student and the respondent will be notified of the decision in writing within 40 calendar days of the administrator's receipt of the complaint. Dismissal of the complaint at this stage by the administrator may be appealed to the Provost.

If the complaint is not dismissed within 40 calendar days of receipt of the formal complaint, the administrator will appoint a three-member ad hoc Investigation Committee within 14 calendar days. The Committee will consist of UMUC employees, with one member appointed chair of the Committee. No member of the Committee may be personally or professionally associated with the allegation. The Investigation Committee may be advised by legal counsel during this process. The administrator or designee(s) will instruct this Committee to review the materials obtained during the inquiry. Within 30 calendar days after being convened, the Committee will hold a fact-finding conference or conduct an investigation. The Committee will communicate with the respondent and the student and give them the opportunity to present any relevant evidence. The respondent may submit questions in writing for the student regarding the alleged act or omission. If a fact-finding conference is held, the respondent and the student will be entitled to be present. The respondent and the student may be accompanied by a representative, who may be an attorney, at his or her own expense. Representatives may advise during the course of a fact-finding conference, but shall not personally participate. Parties who wish to be accompanied by an attorney must inform the administrator in writing at least 5 calendar days before the scheduled date of the proceeding. Representatives may not appear in lieu of persons accused. Within 10 calendar days of holding a fact-finding conference or conducting an investigation, the Investigation Committee will deliberate and issue a brief written opinion containing the findings of the Investigation Committee and any recommendations to the administrator. The administrator will review the recommendations and render a decision. Within 10 calendar days of receiving the Investigation Committee's recommendation, the administrator or designee will notify the student and the respondent of the decision in writing. If the student or respondent believes that the process and procedures outlined in this Policy were not followed, an appeal may be submitted to the Provost and the decision of the Provost is final.

Programs Offered In Iowa

The University of Maryland University College offers the following programs via distance education to Iowa residents. Tuition, fees, and book charges for each general program category are discussed in the sections to follow. In addition to standard fees, students are charged a technology fee of \$13 per credit hour.

Graduate Degree Programs

The University discloses a standard out-of-state tuition rate for graduate level coursework of \$659 per credit hour. The graduate tuition rate for the Master of Business Administration, Master of Science in Cybersecurity and Master of Science in Cybersecurity Policy programs is \$694 per credit hour regardless of residency. The graduate per-credit-hour charge for active military personnel and their spouses, military reserve personnel, and certain dependent children is \$458 per credit hour.

The total, standard, estimated cost of out-of-state tuition and standard fees for a two academic years of graduate study at the University, without the military discount, is \$24,192 (source – College Navigator).

- Master of Arts in Teaching (licensure program)*
- Master of Business Administration
- Master of Business Administration – One-Year Program
- Master of Distance Education and E-Learning (non-licensure)
- Master of Education in Instructional Technology (non-licensure)
- Master of International Management
- Master of Science in Accounting and Financial Management
- Master of Science in Accounting and Information Systems
- Master of Science in Biotechnology
- Master of Science in Cybersecurity
- Master of Science in Cybersecurity policy
- Master of Science in Digital Forensics and Cyber Investigation
- Master of Science in Environmental Management
- Master of Science in Financial Management and Information Systems
- Master of Science in Health Administration Informatics
- Master of Science in Health Care Administration
- Master of Science in Information Technology
- Master of Science in Management
- Master of Science in Technology Management

*The Master of Arts in Teaching program is a teacher preparation program that requires on-site teaching practicum that, for an Iowa resident, may occur at an Iowa location. Graduation from this program does **not** qualify an Iowa resident for an initial teaching license in Iowa. A graduate of this program qualifies for an initial license to teach issued by the State of Maryland. UMUC's Master of Arts in Teaching program web page clearly states that this is the case. A person seeking Iowa licensure must then apply to the Iowa Board of Educational Examiners for an Iowa teaching license. The Iowa Board of Educational Examiners evaluates candidates for Iowa licensure who completed out-of-state educator preparation programs on a case-by-case basis.

Graduate Certificate Programs

The University discloses a standard out-of-state tuition rate for graduate and executive level coursework of \$659 per credit hour. The per-credit-hour charge for active military personnel and their spouses, military reserve personnel, and certain dependent children is \$458 per credit hour.

The total, estimated cost of out-of-state tuition and standard fees for these certificate programs, without the military discount, ranges from \$8,164 to \$12,592, with one exception. The total, estimated cost of out-of-state tuition and standard fees for the Executive Certificate Program – Chief Information Officer is \$28,344.

- Accounting
- Accounting and Information Systems
- Acquisition and Supply Chain Management
- Bioinformatics
- Biosecurity and Biodefense
- Biotechnology Management
- Criminal Justice Management
- Cybersecurity Policy
- Cybersecurity Technology
- Database Systems Technology
- Distance Education, Globalization, and Development
- Distance Education Leadership
- Environmental Management
- Financial Management in Organizations
- Foundations of Cybersecurity
- Foundations of Distance Education and E-Learning
- Foundations of Human Resource Management
- Foundations of Information Technology
- Health Care Administration
- Homeland Security Management
- Informatics
- Information Assurance
- Instructional Technology Integration
- Integrated Direct Marketing
- Intellectual Property, Digitization, and Digital Media
- Intelligence Management
- International Marketing
- International Trade
- Leadership and Management
- Library and Intellectual Property in Distance Education and E-Learning
- Nonprofit and Association Financial Management
- Policy and Management in Distance Education and E-Learning
- Project Management
- Public Relations
- Software Engineering
- Systems Analysis

- Teaching and Training at a Distance
- Technology in Distance Education and E-Learning
- Telecommunications Management
- Executive Certificate Program - Chief Information Officer

Bachelor of Arts Programs

The University discloses an out-of-state tuition rate for undergraduate course of \$499 per credit hour. The per-credit-hour charge for active military personnel and their spouses, military reserve personnel, and certain dependent children is \$250 per credit hour.

The total, estimated cost of out-of-state tuition, standard fees, and books for a 4-year undergraduate degree program at the University, without the military discount, is \$66,155.

- Communication studies
- East Asian studies
- English
- History
- Humanities

Bachelor of Science Programs

The University discloses an out-of-state tuition rate for undergraduate course of \$499 per credit hour. The per-credit-hour charge for active military personnel and their spouses, military reserve personnel, and certain dependent children is \$250 per credit hour.

The total, estimated cost of out-of-state tuition, standard fees, and books for a 4-year undergraduate degree program at the University, without the military discount, is \$66,155.

- Accounting
- Business Administration
- Computer and Information science
- Computer Networks and Security
- Computer Science
- Criminal Justice
- Cybersecurity
- Digital Media and Web Technology
- Emergency Management
- Environmental Management
- Finance
- Fire Service Administration
- Gerontology and Aging Services
- Homeland Security
- Human Resource Management
- Information Systems Management
- Investigative Forensics
- Legal Studies

- Management Studies
- Marketing
- Political Science
- Psychology
- Social Science

Undergraduate Certificate Programs

The University discloses an out-of-state tuition rate for undergraduate course of \$499 per credit hour. The per-credit-hour charge for active military personnel and their spouses, military reserve personnel, and certain dependent children is \$250 per credit hour.

The total, estimated cost of out-of-state tuition, standard fees, and books for these undergraduate certificate programs ranges from \$8,612 - \$10,181.

- Computer Networking
- Human Resource Management
- Management Foundations
- Project Management
- Spanish for Business and the Professions

Associate of Arts Degree Programs

The University offers an online Associate of Arts degree in the following subject areas only to active-duty military personnel overseas and certain others who conform to special stipulations.

The per-credit-hour charge for active military personnel and their spouses, military reserve personnel, and certain dependent children is \$250 per credit hour. The total, estimated program cost for lowa-resident military personnel who qualify for these programs is \$17,730.

- General Curriculum
- Accounting
- Business and Management
- Computer Studies
- Criminal Justice
- Foreign Language Area Studies
- Legal Studies
- Management Studies
- Mathematics
- Women's Studies

Field Experiences

- Master of Arts in Teaching – a student enrolled in this program must complete an internship of sixteen weeks, five full school days per week over the course of a semester and under the supervision of a secondary school teacher who is certified in the intern's content area. All students take responsibility for the entire courseload in planning and instruction by the sixth week. A UMUC faculty supervisor monitors the student's participation. Mentor teachers provide

feedback to the UMUC faculty supervisor on at least three occasions during the internship, a recommended grade at mid-term, and provide a written evaluation at the conclusion of the internship. The UMUC faculty supervisor observes the intern on at least 3 occasions during the internship. The University provides a Master of Arts in Teaching Internship Handbook that explains the expectations of the student, the mentor teacher, and the UMUC faculty supervisor.

- Workplace Learning Program (also called a “co-op”) – an undergraduate student, including an online program student, may earn up to 15 credit hours (no more than 6 credit hours per semester) under a learning agreement with his or her employer and a UMUC faculty mentor. The student must have completed 30 credit hours, of which at least 6 credit hours must have been earned at UMUC, and 9 credit hours in the discipline of the proposed Workplace Learning Program position in order to qualify to earn credit under this program. Students must submit a Workplace Learning Program proposal, similar to a syllabus, in which the student defines learning objectives, texts, experts, or tools that the student will utilize to support the learning process. The student must also outline specific projects that he/she will complete in coordination with the employer. A faculty mentor evaluates the proposal and determines whether it reflects upper level college learning, relates to the field of study, is appropriate for the student’s level of experience in the workplace, and merits credit.

Registration Compliance

As required by Iowa Code Section 261B.4, the UMUC disclosed its policy on refunding tuition charges for withdrawn students. The policy is disclosed on the University’s web site at <http://www.umuc.edu/students/payments/policies.cfm>. The school’s specific institutional tuition refund policy is not a criterion for registration.

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. UMUC maintains these policies and discloses them in its Annual Safety and Security Report at http://www.umuc.edu/legal/upload/2012_Annual_Safety_and_Security_Report.pdf.
- Iowa Code Section 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. UMUC maintains a policy of providing students and military personnel with the opportunity to request exceptions to its standard institutional refund policy on its website http://www.umuc.edu/students/support/advreg/registration/refund_exceptions.cfm. In addition, UMUC will incorporate into its catalog a disclosure for Iowa residents assuring them that UMUC will comply with the student’s request for any of the options afforded to them under Iowa Code

Section 261.9(1)(g), referring the Iowa student to its refund exception policy, and providing the Iowa student with instructions to cross-reference this provision of law in his/her request.

- Iowa Senate File 2225 created a new Iowa Code Section 261.9(1)(h). This new 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 new policy now applies to Iowa's registered schools. UMUC maintains such a policy and provided the policy as an attachment to its registration application.

Student Consumer Information: In its registration application, UMUC affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies; whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. 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. UMUC discloses this information in its undergraduate and graduate catalogs, and in Schedules of Classes that are released on a per-semester basis at <http://www.umuc.edu/students/catalogs/>.

UMUC 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 will disclose its registration with the Commission in its catalogs <http://umuc.edu/students/catalogs/>. The University provides Commission contact information on its financial aid policies web page, <http://www.umuc.edu/students/aid/fapolicies/> under "Filing a Complaint."

Financial Responsibility: UMUC provided an audit report from the independent public accounting firm SB & Company dated October 26, 2012 for the University of Maryland System. The accounting firm expressed its opinion that the University's financial statements present fairly the financial position of the University system and its component units as of June 30, 2012 and 2011.

A private 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. UMUC is not required to calculate and report a composite score because it is a public institution.

Full-Time Iowa Resident Faculty Member or Program Coordinator: UMUC College does not comply with the requirement of administrative rule to employ a full-time Iowa resident faculty member or program coordinator. Consistent with the authority the Commission granted staff during its March 2011 meeting, staff recommends that the Commission waive the full-time Iowa-resident faculty member requirement since the College has applied for registration to offer only distance education programs.

UMUC does employ eight Iowa-resident, part-time faculty members to provide instruction in the following online program coursework from the employee's home or other Iowa location:

- Sue Atkinson – government
- Laura Britson – library skills
- Eric Eller - business
- Stephen Hughes – computer science
- Patricia Keir – doctoral studies in community college management
- Cynthia Letsch – human resources management and development
- Jennifer Smith – library skills
- Barbara Waite – educational principles

All of the Iowans listed above have terminal degrees with the exception of Ms. Atkinson, who has a master's degree from Iowa State University, and Ms. Britson who has two master's degrees, from Drake University and the University of Wisconsin.

Instructional/Supervisory Staff Qualifications: UMUC's policies for hiring faculty require a terminal degree from a regionally accredited or equivalent institution appropriate to the area of instruction, except in the following cases:

- The minimum criteria for a Collegiate or Adjunct Instructor are a master's degree from a regionally accredited or equivalent institution appropriate to the area of instruction (except in rare circumstances) and two years academic, professional, or teaching experience.
- The minimum criteria for an undergraduate Collegiate or Adjunct Assistant Professor permits a master's degree, as an option to a terminal degree, from a regionally accredited institution for individuals who have a minimum of seven years Academic or Professional experience in the academic content area. For graduate faculty, exceptions to the terminal degree requirement may be made for persons with exceptional professional credentials or extensive senior level academic, professional, or teaching experience such that the individual is recognized as an expert or leader in the field.
- The minimum criteria for an undergraduate Collegiate or Adjunct Associate Professor permits a master's degree, as an option to a terminal degree, from a regionally accredited institution for individuals who have a minimum of ten years of academic or professional experience in the academic content area. For graduate faculty, exceptions to the terminal degree requirement may be made for persons recognized as an expert or leader in the field as described above.

Commitment to Iowa Students and Teach-Out: The University's registration application includes a written statement from then-Acting President (now President) Javier Miyares affirming the school's commitment to the delivery of UMUC's online programs to Iowa residents. Acting President Miyares states that, as encompassed in the University's mission, UMUC strives to offer top-quality educational opportunities to adult students throughout the nation, setting the global standard of excellence in adult education. In the unlikely event of program closure, in accordance with University System of Maryland Board of Regents Policy and UMUC Policy, all currently enrolled students will be provided accommodation in the realization of their degree objectives.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

UMUC is a public institution of the State of Maryland, authorized by Maryland Education Code Ann. Section 13-101. Therefore, the University is exempt from filing evidence of financial responsibility, per Iowa Code Section 714.19, subsection 1, as a college or university “. . .authorized by the laws of Iowa or any other state or foreign country to grant degrees.”

Section 714.23 – State Tuition Refund Policy

The Iowa tuition refund policy does not apply to UMUC because it is a public institution.

IOWA COLLEGE STUDENT AID COMMISSION

Vatterott College Application for Postsecondary Registration Renewal March 2013

RECOMMENDED ACTION:

Approve Vatterott College's request to renew its Iowa registration.

As a condition of registration:

- The College must notify the Commission within 90 days of the date it receives updated approval of its on-ground Medical Assistant with Limited Radiologic Technology program, or within 90 days of the date it will cease offering the program if it declines to modify the program in order to meet new conditions established in March 2013 administrative rules by the Iowa Bureau of Radiological Health.
- Vatterott College must notify the Commission within 90 days of the establishment of a new externship or clinical location in Iowa for the Medical Assistant program offered through the Sunset Hills, Missouri campus.

Note: Iowa Code Section 261B.3, generally effective July 1, 2012, reduces the registration term from 4 years to 2 years, effective July 1, 2012. All schools that the Commission approves for initial or renewal registration after July 1, 2012, will be registered for a term of 2 years.

Registration Purpose

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 (effective July 1, 2012) require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this state or if the school otherwise has a presence in this state. Presence means a location in Iowa at which a student participates in any structured activity related to a school's distance education course of instruction. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations. Vatterott College applied to renew its registration in order to continue to operate in Iowa from its permanent physical location in Des Moines, Iowa, and to offer Iowans distance education programs that are coordinated by its campus in Sunset Hills, Missouri. At least one of its distance education programs includes a structured field experience that an Iowan will participate in at an Iowa location.

Institutional Information

Vatterott College is a for-profit postsecondary educational institution that provides programs via in-person instruction at 7000 Fleur Dr., Des Moines, Iowa 50321. The College coordinates the distance education programs it offers Iowans from its location at 12970 Maurer Industrial Dr., Sunset Hills, Missouri. The College's Chief Executive Officer is President Pamela Bell, 9200 Olive Boulevard, Suite 222, Olivette, Missouri, which is Vatterott's corporate

headquarters. The parent company of Vatterott College is Vatterott Educational Centers, Inc. The College submitted an outline of ownership that traces back through Vatterott Educational Centers, Inc., Vatterott Education, Inc., Vatterott Education Holding, Inc., to Vatterott Acquisition Co., John Hancock Tower 56th Fl., 200 Clarendon Street, Boston Massachusetts. Vatterott Educational Centers, Inc., maintains an active certificate of authorization to conduct business in Iowa, #266387, as a foreign profit corporation. Its Iowa registered agent is National Corporate Research Ltd., 604 Locust St., Suite 222, Des Moines, Iowa 50309. The College's Iowa contact person is Des Moines Campus Director Sarah Bouma, 7000 Fleur Dr., Des Moines.

Physical Facilities: Vatterott College's Des Moines location is at 7000 Fleur Drive, a new building that was constructed for the College and first occupied in November of 2006. The building was designed to accommodate a variety of trades, allied health, and information technology programs. The facilities occupy approximately 44,000 square feet, including 20 classrooms, a learning resource center (LRC) which is the campus library facility, and a student lounge. The following facilities address specific program needs:

- The Diesel Mechanic program has a large shop area that can hold up to three full size semi cabs and three welding stations with all proper safety equipment.
- The HVAC (Heating, Air Conditioning and Refrigeration Mechanic) area has multiple heating and cooling units.
- The Dental department has one functional and one expansion laboratory, one large dental clinical with four operational areas, three operational x-ray bays, a dedicated sterilization area, and a large darkroom that is shared with the Medical department.
- The Medical department has a large functional medical clinic with three private exam areas, a classroom computer lab, and a room with x-ray equipment used for positioning of patients and exposure of phantom body parts.
- The CSNT (Computer Systems & Network Technology) area has computer systems in each classroom with hardware and software appropriate for each program application.

The College submitted a current lease for the property it occupies at 7000 Fleur Drive in Des Moines. Conditions of the lease provide for 280 parking spaces, accommodations for the disabled under the Americans with Disabilities Act, and a fire alarm system.

Accreditation: The Des Moines campus of Vatterott College is accredited by the Accrediting Commission of Career Colleges and Schools (ACCSC), a national accrediting agency recognized by the federal Department of Education. Its Sunset Hills, Missouri location was scheduled for regular accreditation renewal review at the February, 2013 ACCSC meeting; results of that review are pending.

Federal Stafford Loan Cohort Default Rate (FFY 2010):

- Des Moines campus: 14.5
- Berkley, Missouri (which includes the Sunset Hills, Missouri online campus): 14.3

For comparison purposes, the FFY 2010 national average cohort default rate is 9.1%.

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.

- Des Moines campus: 58%
- Sunset Hills, Missouri (online) campus: 57%

Average Loan Debt upon Graduation:

- Des Moines campus: \$16,934
- Sunset Hills, Missouri (online) campus: \$16,248

Record Preservation: Vatterott College maintains student records in accordance with its internal record retention guidelines, which are informed by the applicable requirements of its various accreditors, and state and federal regulators. These guidelines identify minimum retention periods for several categories of student records, including registration and academic progress records, admissions records, and financial aid records, to name a few. When records have exceeded their retention period, they are disposed of by the campus. Permanent records (for example, transcripts) either are kept onsite or moved to an off-site, secure storage facility. At all times, such records are preserved in a location affords protection against damage and loss.

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

Brandon Shedron, Chief Academic Officer
9200 Olive Blvd., Suite 222
Olivette, Missouri 63132
(314) 264-1500

The College also maintains an online transcript request form at
<http://www.vatterott.edu/current.asp>

Instructional Methodology:

- *Des Moines campus:* With one exception, the programming offered by the College at its Des Moines campus is delivered on-ground, primarily utilizing a combination of traditional classroom instruction (lecture) and hands-on training (lab). In addition, a number of programs include an externship experience, which typically takes place during the student's ultimate or penultimate term and occupies the majority of the term. While the Des Moines location's instruction is delivered almost entirely on-ground, the College uses an online platform to deliver an array of learning and support services, for example electronic library resources and career services webinars. The Des Moines

location also offers an online GED Exam Preparation Course. The goal of this online course is to prepare students for the GED test. Using the College's online platform, the course covers question formats for each discipline tested, insight into question formats for each content area tested, sample practice test items, explanation of sample question answers, and specific tips and insights for passing each test section and content area. Vatterott College informed staff of its GED preparation program in January, 2012. Staff referred the College to the Iowa Department of Education for coordination with its GED guidelines.

- *Sunset Hills, Missouri (online) campus:* The College's Sunset Hills, Missouri location partners with eCollege, an independent college software and service provider owned by Pearson PLC. Institutions utilize eCollege's online, interactive learning management system to deliver and manage online courses for students. Vatterott College selected this system for its ability to create learning content using web-based tool's develop custom learning paths for individual students or groups; facilitate student participation, communications, and collaboration, and evaluate students' work using assessment capabilities for outcomes. The various eCollege applications are intuitive, easy for students and instructors to use, and are built on a scalable enterprise technology that facilitates performance. Each student who enrolls in an online program is issued a user name and password that provides unlimited access. Among others, the eCollege Learning Management System offers the following features:
 - ✓ An announcements section for updating students on important events happening inside and outside of the classroom
 - ✓ E-mail and discussion boards that permit instructors and students to communicate asynchronously
 - ✓ Live chat functionality that permits real-time interaction and real-time lecture presentations
 - ✓ Recorded lectures that enable students to view presentations asynchronously
 - ✓ A "What's new" section alerting students to new materials that have been added since the last time they logged in
 - ✓ Gradebook feedback functionality permitting students to know exactly where they stand in the course

Student Learning Resources: Hard-copy learning resources are available to students attending the College's Des Moines campus in the on-campus Learning Resource Center (LRC) which contains computers, texts, journals, electronic resources, Internet accessible research databases, and other similar resources and equipments. An onsite LRC Manager provides students with assistance navigating the in-house resource collection during normal business hours (Monday, Wednesday, Thursday and Friday 8 am to 5 pm, Tuesday 8 am to 8 pm):

- Guidance to students seeking on-line tutoring resources
- Assistance to students engaged in on-line job searches and completion of on-line job applications
- Resume and term paper writing assistance
- Remedial tutoring for students seeking to improve their computer skills
- Training in the use of on-line data bases

Online library resources are available to all residential and online students through EBSCO Host, an online research database provided by EBSCO Publishing. This service permits students to conduct research for projects, papers, and class assignments from remote locations, offers access to textbooks, periodicals, white papers, research journals, electronic resources, and resource materials. Databases that are available through the electronic Learning Resource System include Associates Program Source Plus, Computers and Applied Sciences Complete, GreenFILE, Library, Information Science & Technology Abstracts (LISA), and MEDLINE with Full Text.

Through the online student portal, which is accessible on or off campus, the student may access information about their academic progress, and through the eCompanion component, the student's courses, grades, syllabi, weekly outlines, and other support materials. The College emphasizes the use of the online Learning Resource System and incorporates its use into at least one assignment each term. In November of each year, all students are required to participate in Information Literacy Day in which students complete a research project utilizing the Learning Resource Center. Library Services, Career Services, Retention, and the Director of Education provide support and guidance to students as they complete their projects.

Both the Des Moines and Sunset Hills (online) campuses offer students tutoring assistance, retention services (personal advising and counseling) and career services. The College has taken steps in recent months to further expand and strengthen its retention program by implementing a new, multi-part retention initiative:

- Pathways to Success – a comprehensive plan for providing students with guidance, mentoring and other support services. This program builds upon a pre-existing plan to increase student contact, combat absenteeism, provide motivational guest speakers, career management workshops and, most recently, formal student outreach activities and training that lasts for the duration of the student's educational experience.
- Attendance Hotline and Email – the College makes available a dedicated, toll-free telephone number and email address intended to facilitate communication between the College and students on matters relating to attendance and for reporting of issues that might impede the student's attendance.
- Absent Student Outreach Plan – In 2012 the College initiated a system designed to help identifying and reaching out to absent students as quickly and efficiently as possible.
- Student Resource Services (SRS) – the College's corporate parent has contracted with SRS, a third-party provider, to begin providing a broad range of additional counseling and support services to student:
 - ✓ Students may connect by phone with a licensed counselor, free of charge, to receive confidential and professional guidance regarding any concern that may affect their performance at the College
 - ✓ Students may access face-to-face (or telephonic) counseling through a network of licensed counselors at no charge up to 5 sessions per issue
 - ✓ Counselors coach students through issues to find possible solutions and to develop an action plan

- ✓ Students are linked with community resources they may contact for daily living needs
- ✓ Students may consult with an attorney on legal issues. If the student chooses to retain a local attorney, a discount is applied to the fee
- ✓ Students are offered financial planning, budgeting, bankruptcy, credit or identify theft assistance
- ✓ Access to studentlifetool.com contains expert articles on budgeting, stress, childcare, and relationships

Student Resources Services also provides faculty and staff with access to confidential consultations with a licensed counselor regarding student concerns, behavioral or classroom management issues.

All student services are available to on-ground and online students.

Curriculum Evaluation and Development: All of the College's programs are created under a standard curriculum design process. An internal curriculum committee comprised of current faculty with expertise in the appropriate subject area creates each program's content and structure with oversight from the College's senior academic personnel. The committee identifies the knowledge and skill objectives for students completing each course in a program, develops common assessments for each course and, ultimately, pre- and post-test course examinations for the program, enabling the College to measure student performance and institutional effectiveness. All elements of a program are developed in consultation with a Program Advisory Committee (PAC). A PAC committee consists primarily of representatives from the employment community and practitioners. PAC members review and provide direction relating to the established curricula of a program, instructional-related program materials, equipment and facilities, and student achievement objectives. PAC members do not approve programs, nor is there any requirement that they always be unanimous in their views. They are an advisory committee only. However, any feedback received from a PAC is given the utmost consideration. Many PAC members are business owners that employ the College's graduates.

Student Complaints Process: Should a student have a grievance or complaint concerning any aspect of his or her recruitment, registration, attendance, education, or student services, the student should first contact the faculty or staff member to whom the grievance or complaint refers. If the student remains dissatisfied, he must submit his grievance or complaint in writing to the Director of Education. The Director of Education will review the issue, seek resolution and notify the student of the remedy within 10 days. If the student is not satisfied with the response from the Director of Education, the student must appeal to the institution's director in writing and within 10 days of receiving the Director of Education's decision. The institution Director will respond to the student's appeal within 10 days. Students who wish to contest a Director's resolution may submit a written appeal to the Chief Administrator, Vatterott Educational Centers, Inc., whose decision is final. At any time the student may contact the Vatterott Educational Centers, Inc., Student Affairs division for assistance. The student may also, at any time, contact the Iowa College Student Aid Commission or the Accrediting Commission of Career Schools and Colleges, the agency's accrediting agency. Vatterott College discloses its grievance policy to students in its course catalogs:

- Des Moines campus: http://www.vatterott.edu/Documents/catalogs/Des_Moines.pdf

- Sunset Hills (online) campus:
http://www.vatterott.edu/Documents/catalogs/Sunset_Hills.pdf

Programs Offered In Iowa

The total, estimated cost of tuition, fees, books and supplies for each program is listed below.

On-Ground Programs Offered at Vatterott's Des Moines campus

- Undergraduate Certificate (this program is ineligible for federal student aid)
 - ✓ Commercial Driver's License - \$4,250. Staff confirms that neither the College nor the instructor in this program needs any special approval by the Iowa Dept. of Transportation.
- Undergraduate Diploma
 - ✓ Electrical Service Technician - \$25,450
 - ✓ Heating, Air Condition & Refrigeration Service - \$24,050
 - ✓ Information Systems Security - \$24,500
 - ✓ Medical Assistance Occupational Specialist - \$17,100
 - ✓ Wind Energy - \$18,900
- Associate Degree
 - ✓ Computer Systems and Network Technology - \$31,550
 - ✓ Dental Assistant Specialist* - \$30,350
 - ✓ Diesel Mechanic - \$38,850
 - ✓ Heating, Air Conditioning & Refrigeration Service Technician with Management - \$38,400
 - ✓ Medical Assistant with Limited Radiography[±] - \$39,750
 - ✓ Medical Assistant with Office Management - \$32,700
 - ✓ Medical Billing and Coding - \$33,800
 - ✓ Paralegal - \$31,220

*The Iowa Board of Dental Examiners licenses Dental Assistants. Staff contact with the Board confirms that Vatterott College's Dental Assistant program meets the conditions for licensure, i.e., approval by the American Dental Association Commission on Dental Accreditation (ADA).

[±] The State of Iowa Department of Public Health licenses "Limited Radiographic Technologists." The Department of Public Health requires that a successful licensee's educational program either be approved by the Joint Review Committee on Education in Radiologic Technology (JRCERT) or by the Iowa Department of Public Health Bureau of Radiological Health. Vatterott's program is not accredited by JRCERT. However, staff contact with the Iowa Bureau of Radiological Health confirms that it approves of the College's program. The Bureau of Radiological Health is preparing for the release of administrative rules on March 13, 2013, that may impact conditions under which the Bureau approves a limited radiographic technology program. However, the Bureau advises that it will work with schools regarding the new administrative rule requirements after publication, and Vatterott College is aware of this change.

Online Programs

- Undergraduate Certificate (none of these programs are eligible for federal student aid)
 - ✓ Basic Fire Alarm Installation - \$650
 - ✓ Better Green Business - \$335
 - ✓ CMA/RMA Exam Preparation Course - \$75
 - ✓ Electronic Evidence Discovery - \$1,445
 - ✓ Smart Phone Programming - \$510
 - ✓ Your Role in the Green Environment - \$335
- Undergraduate Diploma
 - ✓ Information Systems Security - \$24,500
- Associate Degree
 - ✓ Business Management - \$30,200
 - ✓ Medical Assistant* - \$29,600
 - ✓ Medical Billing and Coding - \$29,600

*Students enrolled in the online Medical Assistant program must complete a 160-hour externship and a separate clinical experience, both of which will occur at various locations in Iowa. Vatterott College/Sunset Hills establishes formal relationships with hospitals or clinics for the externship requirement of the Medical Assistant program. For the clinical portion of the program, Vatterott College/Sunset Hills will establish an arrangement with an Iowa postsecondary institution (for example, a community college) that is accredited by an accrediting agency recognized by the federal Department of Education, and that has an accredited Medical Assistant program. Credits that students earn in the clinical experience at Iowa institutions will be transferred to the College's Sunset Hills, Missouri, program. Vatterott College/Sunset Hills will consider locations for the externship and clinical portions of the program, in part, based on a student's needs and physical location.

Registration Compliance

As required by Iowa Code Section 261B.4, Vatterott College disclosed its institutional policy on refunding tuition charges for withdrawn students at the Des Moines campus and for Iowa resident students enrolled in online programs coordinated by the College's Sunset Hills campus. The College's tuition refund policy meets the requirements of Iowa Code Section 714.23 and is disclosed to students in the respective course catalog for the Des Moines and Sunset Hills locations at:

- http://www.vatterott.edu/documents/catalogs/Des_Moines.pdf
- http://www.vatterott.edu/documents/catalogs/Sunset_Hills.pdf

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. Vatterott College complies with the requirements of Iowa Code Section 261.9(1)(e) and (f), for both the Des Moines and Sunset Hills campuses, through disclosures provided by one or more of the following: the campus annual security report, the campus catalogue, a separate campus web site page devoted to the topic, or the campus financial aid office.

- Iowa Code Section 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. Vatterott College maintains this policy for students attending its Des Moines campus and Iowa resident students attending its online programs coordinated by its Sunset Hills, Missouri campus. The policy is disclosed to students in the respective course catalogs for the Des Moines and Sunset Hills locations at:
 - ✓ http://www.vatterott.edu/documents/catalogs/Des_Moines.pdf
 - ✓ http://www.vatterott.edu/documents/catalogs/Sunset_Hills.pdf
- Iowa Senate File 2225 created a new Iowa Code Section 261.9(1)(h). This new 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 new policy now applies to Iowa's registered schools. Vatterott College adopted a policy that meets this requirement during the registration application review process and provided staff with a copy of the policy.

Student Consumer Information: In its registration application, Vatterott College affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. 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 and the College discloses them in its respective course catalogs for the Des Moines and Sunset Hills, Missouri (online) locations.

Vatterott College 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 College currently discloses the Commission's contact information for student complaints in its respective course catalogs for the Des Moines and Sunset Hills, Missouri locations.

The College includes on its consumer information website http://www.vatterott.edu/consumer_information.asp a section titled “Entities that Accredit, License, or Approve the Institution.” A drop-down box on this site provides the following information:

The names of the organizations that accredit, approve, or license each Vatterott school and its programs are detailed in the current Campus Catalog for that location, along with contact information for each such organization. The Campus Catalog for each Vatterott school is available at www.vatterott.edu/catalogs.

The College also will make available upon request a copy of each school’s accreditation, licensure, or approval documentation. To request a copy of any such documentation, students should submit a written request to the appropriate Campus Director or via email to consumerinfo@vatterott.edu

Financial Responsibility: Vatterott College submitted copies of an audit of its parent company, Vatterott Educational Centers, Inc., conducted by independent auditing firm Ernst and Young, for the fiscal years ending December 31, 2010 and 2011, and dated April 9, 2012. The auditing firm expressed its opinion that the College’s financial statements present fairly, in all material respects, the school’s financial position.

- A for-profit institution that participates in the federal student aid programs must maintain a composite score, based on a three factor financial responsibility ratio, of at least 1.5 in order to be determined “financially responsible” without additional oversight. For the most recently evaluated institutional fiscal year, Vatterott College did not meet 1.5 composite score threshold. Therefore, to satisfy the federal Department of Education’s financial responsibility expectations, the College has posted a letter of credit with the U.S. Department of Education in the amount of \$20,471,034.00 and complies with the federal Department of Education stipulations regarding federal student aid funds management.
- A for-profit institution is prohibited from deriving more than 90% of its revenue from Title IV aid. The independent auditors tested the College’s calculation its 90/10 ratio for its campuses. The Vatterott College/Des Moines derived 87.7% of its revenue from Title IV aid. The Sunset Hills campus is included a Vatterott College division labeled “Berkeley,” which derived 88.9% of its revenue from Title IV aid.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Vatterott College discloses a total of 22 faculty members at its Des Moines campus. Nine faculty and its Campus Director are full-time employees.

Instructional/Supervisory Staff Qualifications: The College provided resumes for 22 Iowa-based faculty, all of whom provide instruction at the Des Moines campus. Staff also accessed approximately 40 national web postings of Vatterott Educational Centers job openings for instructional staff. For the purpose of evaluating faculty, staff note that the highest degree Vatterott College offers is an Associate Degree, and that several of its programs are skill-based, undergraduate certificate or diploma programs. For general education faculty (e.g., mathematics and communications), Vatterott College requires a Master’s degree and 15 credit hours in the applicable subject matter area. For faculty in trade programs such as Medical

Assisting, Diesel Mechanic, and Computer Technology, the College's minimum educational requirement is an Associate's Degree and at least three years of employment experience in the subject matter area.

Resumes provided for the Des Moines faculty reveal the following:

- Of two full-time and an additional two part-time instructors in the medical assistant programs, two are Registered Nurses with experience as Nursing Directors, three have a baccalaureate degree, two have an associate degree in health sciences, two are certified Emergency Medical Technicians, all have health sciences related job experience ranging from 6 to 18 years
- Of two part-time faculty dedicated to instruction in the Medical Assistant with Limited Radiography technology program, one has a baccalaureate degree in business administration and approximately 17 years experience in medical office management. The other faculty member has an associate degree in radiography technology, is an Iowa-licensed General Radiographer, is certified by the American Registry of Radiologic Technologists, and has over 20 years experience in radiography.
- Of the two full-time heating/cooling systems instructors, one has a baccalaureate degree in mechanical engineering and approximately seven years experience relating to the design of heating and cooling systems. The second instructor obtained a postsecondary diploma from a nationally accredited institution that specializes in technical programs including heating/cooling, and has approximately four years of hands-on work experience in heating and cooling systems.
- The single full-time faculty member in the dental assisting program has a postsecondary diploma in dental assisting, an associate degree in business administration, and is pursuing a baccalaureate degree at this time. She is an Iowa-registered dental assistant with approximately ten years of work experience as a dental assistant and dental office manager.
- Of the three instructors in the area of diesel mechanics, one is a full-time employee. Two of the three instructors have an associate degree and the third instructor graduated from a technical high school. All have significant work experience in diesel mechanics ranging from 10 years to approximately 24 years, including in management, supervisory, and instructional roles.
- Of the two wind energy faculty, one is a full-time employee. One of the faculty members has a bachelor of science in technical management and an associate degree in wind energy and turbine technology. The second faculty member has a bachelor's degree in aerospace mechanical engineering. Both have hands-on experience working with wind turbines.
- The single part-time electronics instructor has a bachelor's degree in electrical engineering and experience dating back to 1987 in physical plant operations management. He possesses state or city licenses as a master plumber, master HVAC (heating/cooling systems), master hydronics (boilers), a journeyman electrician, and a first class power engineer.

- Of the two part-time computer technology instructors, one has two associate degrees in the telecommunications technology field and the second faculty member has a baccalaureate degree with a minor in computer information systems and industrial technologies. Both have employment experience in the technology, networking, and information security fields ranging from approximately 11 to 16 years.
- Three of four part-time General Education faculty members possess a Master's degree in Industrial Psychology, Education/Mathematics, and Communications, respectively. The fourth part-time faculty member has bachelor's degree in journalism and communications, has been self-employed as a marketing and advertising consultant since 1999, and teaches business and communications courses at Vatterott.
- Staff notes that there appears to be a vacancy among faculty with specialization required to teach in the paralegal program, and that there is a current job posting for a part-time faculty member to teach in this area at the Des Moines campus.

Commitment to Iowa Students and Teach-Out: The College's application includes a statement signed by Vatterott College CEO and President Pamela Bell affirming the College's commitment to deliver the programs authorized by the Commission and to provide alternatives for students to complete those programs at other institutions if Vatterott ceases to delivery the program before students have completed their courses of study.

Student Complaints: Since June of 2010, the Commission has received one complaint from an lowan attending the Des Moines campus of Vatterott College. The student's general issue pertained to the conduct of an instructor. Staff referred the student to the Commission's online Constituent Request for Review form to provide us authorization to contact the school, as well as request and receive confidential student records. The student did not submit the Constituent Request for Review form and Commission staff therefore did not follow up.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Vatterott College submitted, with its registration renewal request that it has maintained the financial responsibility requirements of Iowa Code Section 714.18, including a continuous corporate surety bond payable to the State of Iowa in the amount of \$50,000, issued by Travelers Casualty and Surety Company of America.

Section 714.23 – State Tuition Refund Policy

Vatterott College's tuition refund policy for students who withdraw from its Des Moines campus or Iowa residents who withdraw from its online programs complies with the provisions of Iowa Code Section 714.23.

Compliance with Iowa Code Chapter 261F

During the registration review process, Vatterott College made minor adjustments to its Educational Loan Code of Conduct for all of its campuses in order to demonstrate compliance with the Educational Loan Code of Conduct provisions of Iowa Code Chapter 261F. The updated policy will be disclosed on the College's website at http://www.vatterott.edu/financial_aid.asp

The College does not maintain a preferred lender list for private education loans and its financial aid offices make no referrals to private education loans whatsoever.

IOWA COLLEGE STUDENT AID COMMISSION

College of Saint Mary Application for Postsecondary Registration in Iowa March 2013

RECOMMENDED ACTION:

Approve College of Saint Mary's application for Iowa registration to provide a portion of its campus-based nursing programs at an Iowa location using compensated faculty.

As a condition of its registration and per Iowa Code Section 261B.5, the College must notify Commission staff within 90 days of the establishment of a new Iowa location at which its campus-based students will participate in a field experience under the supervision of compensated instructors or supervisors.

- By the beginning of the Fall Term 2013, the College must develop, implement, and provide staff with a copy of a policy that complies with new Iowa Code Section 261.9(1)"h" (as enacted by Iowa Senate File 2225).

Note: Iowa Senate File 2267 enacted a change in Iowa Code Section 261B.3 that reduces the registration term from 4 years to 2 years, effective July 1, 2012. All schools that the Commission approves for initial or renewal registration after July 1, 2012, will be registered for a term of 2 years.

Registration Purpose

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 (effective July 1, 2012) require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this state or if the school otherwise has a presence in this state. Presence means, in part, an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations. College of St. Mary applied for registration to offer the clinical portion of its otherwise residential nursing programs at an Iowa location. The school's paid faculty accompanies students to the Iowa clinical site and provides instruction or supervision. The remainder of the nursing program students' instruction occurs on the College's campus in Omaha, Nebraska.

As it relates to distance education, there are no Iowa registration implications for the College at this time since the College currently offers only individual online courses.

Institutional Information

College of Saint Mary (CSM) is a private, non-profit institution located at 7000 Mercy Road, Omaha, Nebraska. The College's Chief Executive Officer is Dr. Maryanne Stevens, RSM, President, at the same address. CSM is registered with the Iowa Secretary of State's office as an entity transacting business in Iowa. Its Iowa registered agent is Registered Agent Solutions, Inc., 5532 Baraboo Court, Davenport, IA 52804.

CSM will conduct the clinical portion of its otherwise residential nursing and occupational therapy programs under an agreement with Alegent Health (Mercy Hospital), at 800 Mercy Drive, Council Bluffs, Iowa.

Physical Facilities: Under the terms of the College's agreement with Alegent Health, Alegent Health agrees to permit CSM students access to clinical facilities, equipment and supplies. Students may also access Alegent Health's medical library.

Accreditation: The College is accredited by the Higher Learning Commission (HLC), a regional accrediting agency recognized by the federal Department of Education. In addition, its Associate and Baccalaureate of Science in Nursing degree programs are approved by an agency recognized by the federal Department of Education for special accreditation of nursing programs: the National League for Nursing Accrediting Commission.

Other Approvals: CSM's Practical Nursing Certificate and Associate of Science in Nursing programs are approved by the Nebraska Board of Nursing for the purpose of nursing licensure. Iowa Board of Nursing approval is not required for this out-of-state school.

Federal Stafford Loan Cohort Default Rate (FFY 2010): 9.4%. For comparison purposes, the FFY 2010 national average cohort default rate is 9.1%.

Graduation Rate: 41%. 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.

Average Loan Debt upon Graduation: For 2011 graduates –

- Federal loans: \$22,014
- Alternative loans: \$9,313
- Total loan debt: \$31,327

Record Preservation: A student's permanent academic file is scanned and stored electronically after the student either graduates or otherwise leaves the college. The data is store off-site at a third-party vendor's facility. It can be accessed via a secure web site. Paper records are then destroyed. The transcript information is stored permanently in our database, which is backed up and the backup media is stored off-site with a different third-party vendor.

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

Registrar, College of Saint Mary
700 Mercy Road, Omaha, NE 68106
(402) 399-2442

http://www.csm.edu/Campus_Services/Registrars_Office/Transcript_Request/

Instructional Methodology: For the portion of CSM's programs in which instruction occurs in Iowa, nursing students are supervised in clinical settings by full-time CSM nursing faculty.

Student Learning Resources: Computer labs at the school's Omaha campus are available to students when labs are not reserved for class time. Professional staff and student workers provide assistance to students. The labs include three instructional labs as well as a general use lab. myCSM portal offers all school community members a personalized web interface for viewing announcements and events as well as personal document storage and collaboration spaces. The CSM campus wireless network service provides laptop and mobile device users with fast and convenient access to the internet, CSM mail, and other web-based services. The wireless network is available in all classrooms and public spaces including the plaza and many other outdoor areas.

The College of Saint Mary Library is a comprehensive source of information that provides reference, research materials, and experienced staff to assist the school community. Materials include reference books, online and print journals, databases, books, e-books, and media. The CSM Library offers services in person, by telephone, and online. Students may request online assistance through Ask A Librarian. This is an interactive service that allows the patron to submit a question to staff and receive an answer within 48 hours. The Library is open seven days a week with adjusted hours during midterms and finals, holiday breaks, and during the summer. Laptops may be checked out for in-house use. The Library also offers private study rooms, scanners, a copier, printer and computers with the Microsoft Office Suite. The Library maintains Reserves, materials provided by individual faculty, to give students access to resources that are directly related to their classes.

The CSM Achievement Center provides centralized services to support students' academic achievement, through advising, tutoring, career services, ADA accommodations, and innovative academic support programs.

Curriculum Evaluation and Development: The College referred staff to the resumes of its program directors in response to this question. Faculty qualifications are discussed below.

Student Complaints Process: The College disclosed its process for handling formal academic complaints in its undergraduate or graduate catalogs. The Student Academic Appeals Board exists to provide the student with a means to appeal a specific academic decision that the student considers unwarranted, unjust or capricious. A student who wishes to make an appeal related to an academic matter must begin the process no later than one month after the end of the semester in which the decision was made. It is the responsibility of the instructor to inform students of course requirements, evaluate students fairly on the basis of the academic performance, encourage free and open discussion, inquiry and expression in the classroom, and identify methods of evaluation/grading that will be used for the course. It is the responsibility of the student to inquire as to course requirements when in doubt, maintain the standards of academic performance established by the professor, and to follow the appeal process if academic rights have been violated.

The process for an Academic Appeal is as follows:

- 1) Discuss the matter of appeal with the instructor.
- 2) Discuss the matter of appeal with the Program Director of the course.
- 3) Discuss the matter of appeal with the course Division Chairperson.
- 4) Discuss the matter of appeal with the Vice President for Academic Affairs.
- 5) If the appeal is then not resolved, submit an "Application to the Academic Appeals Board"

The Vice President will convene the Academic Appeals Board. It is the responsibility of the Academic Appeals Board to evaluate each case confidentially and fairly and to develop a course of action that will resolve the matter. The Academic Appeals Board will notify the offending party and schedule a hearing

in which both parties are present to state their side of the case. The board will make a decision within two weeks following the hearing. Membership in the Student Academic Appeals Board consists of two faculty members and one alternate, to be elected by the Faculty Assembly, and two students, to be elected by the student body association. The Vice President for Academic Affairs will serve as Chair. In addition, for each case there will be one faculty member, to be appointed by the student registering the complaint, and one student, to be appointed by the faculty member against whom the complaint is filed. Recommendations made by the Student Academic Appeals Board and the Nursing Student Policies Committee are forwarded to the Vice President for Academic Affairs. Her/his decision is final.

Programs Offered In Iowa

The College of Saint Mary offers the following programs using a clinical site in Iowa at which compensated faculty provide instruction.

- Practical Nurse Certificate
- Associate of Science in Nursing (ASN)
- Bachelor of Science in Nursing (BSN)

Tuition and Fees

The College discloses a full-time, undergraduate tuition charge **per semester** of \$12,415. A reduced per-credit-hour tuition charge is available to the employees of Alegent Health in Council Bluffs, Iowa.

Other than standard application, matriculation, graduation and transcript fees, the college also charges special academic program and clinical course fees as follows:

- ASN Assessment program - \$385 per semester
- Practical Nursing Certificate assessment - \$385 per semester
- Clinical course fees for ASN and BSN students - \$405 per clinical course
- Clinical course fees for Practical Nursing Certificate students - \$305 per clinical course

All fee charges are listed in the College's academic catalog at

<http://www.csm.edu/wfdata/files/Academics/AcademicCatalog/UnderGraduate/2012-2013.pdf>.

Registration Compliance

As required by Iowa Code Section 261B.4, CSM disclosed its policy on refunding tuition charges for withdrawn students. The policy is disclosed in the College's catalog

<http://www.csm.edu/wfdata/files/Academics/AcademicCatalog/UnderGraduate/2012-2013.pdf> and on its website at http://www.csm.edu/Future_Students/Student_Accounts/Refund_Policy/. The school's specific tuition refund policy is not a criterion for registration.

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 College maintains these policies and discloses them in their Annual Campus Security and Fire Safety Report and Alcohol and Drug Abuse Prevention Information at http://www.csm.edu/About_Us/Notices_And_Disclosures/.

- Iowa Code Section 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. CSM adopted a policy to comply with this administrative rule requirement for **all** of its students and discloses the policy on its website at http://www.csm.edu/About_Us/Notices_And_Disclosures/.
- Iowa Senate File 2225 created a new Iowa Code Section 261.9(1)(h). This new 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 new policy now applies to Iowa's registered schools. Staff request that the Commission waive enforcement of this new rule as it relates only to registration qualifications for the same delayed enforcement period that staff have granted to Iowa's own schools for the purpose of qualifying for state-based student financial aid, i.e., until fall of 2013. Schools that are scheduled for registration consideration during the waiver period will be expected to develop and implement a policy that complies with new Iowa Code Section 261.9(1)(h) by the end of the waiver period.

Student Consumer Information: In its registration application, CSM affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. 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. CSM provides students with these disclosures in its Academic Catalog at <http://www.csm.edu/wfdata/files/Academics/AcademicCatalog/UnderGraduate/2012-2013.pdf>.

CSM 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 College will disclose this information on its Notices and Disclosures website http://www.csm.edu/About_Us/Notices_And_Disclosures/.

Financial Responsibility: The College of Saint Mary submitted an audit report dated October 27, 2011, conducted by an independent auditing firm Dana F. Cole & Company, LLP, covering the institutional fiscal years ending June 30, 2011 and 2010. The auditing firm expressed its opinion that the College's financial statements present fairly, in all material respects, its 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 financially responsible without additional oversight. Staff did not find that the independent auditing firm reported or tested the College's composite score. The most recent composite score available from the federal Department of Education for CSM is 3.0.

Full-Time Iowa Resident Faculty Member or Program Coordinator: The College of Saint Mary employs one full-time Iowa resident faculty member, Dr. Kathleen Zajic, who is the Program Director for the ASN and BSN programs and who is the program coordinator for the clinical field experience located at Alegent Hospital in Council Bluffs, Iowa. Three additional, full-time CSM faculty members also provide instruction and supervision at the Iowa clinical location.

Instructional/Supervisory Staff Qualifications: Staff accessed 15 faculty profiles on the CSM web site. The College also provided complete resumes for the 4 faculty members who provide instruction or supervision in the nursing program clinicals located in Council Bluffs. Of the 15 faculty, 4 hold a terminal degree in education. Eleven faculty have graduate degrees in nursing and two are pursuing an Education doctorate. One faculty member, who is an interim practical nursing certificate instructor, is a Nebraska-licensed Registered Nurse. Some faculty are published authors and have considerable experience in educating peers and developing curriculum.

Commitment to Iowa Students and Teach-Out: The College's registration application includes a written statement from President Dr. Maryanne Stevens affirming the College's commitment to the continued use of Alegent Health in Council Bluffs, Iowa, as a clinical site for its nursing programs. In the event that the College would no longer be able to continue using that clinical location, students in the College's nursing programs would be able to complete their clinical practice at facilities in the Omaha, Nebraska region. In addition, if CSM were to close before enrolled students were able to complete their program of study, the College would provide alternatives for students to complete their programs at other institutions. Dr. Stevens states that the College of Saint Mary pledges to offer the same commitment to other academic programs that may be offered in Iowa in the future, which may include teacher education programs and distance education programs.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Staff approved the College's financial responsibility application, which includes a \$50,000 instructional school bond payable to the State of Iowa and issued by Travelers Casualty and Surety Company of America.

Effective July 1, 2012, new revised Iowa Code Section 714.24, subsections 1 and 2, requires a school that is governed by the financial responsibility and exemption provisions of Iowa Code Sections 714.18 and 714.19 to renew evidence of financial responsibility or substantiate continued qualification for an exemption, at minimum, every two years. This renewal may occur at the same time the College applies for registration renewal, which is also now on a 2-year cycle.

Section 714.23 – State Tuition Refund Policy

The Iowa tuition refund policy does not apply to the College of Saint Mary because it is a private nonprofit institution.

**Iowa College Student Aid Commission
Information Item - Ashford University
March 2013**

On February 28, 2013, Ashford University notified Commission staff via e-mail and telephone about the imminent release of a Public Disclosure Notice about the University by the Higher Learning Commission (HLC).

On March 1, 2013, staff accessed the HLC's Public Disclosure Notice on Ashford University on the HLC website at [http://www.ncahlc.org/download/ PublicDisclosureNotices/PDN 1249.pdf](http://www.ncahlc.org/download/PublicDisclosureNotices/PDN_1249.pdf).

Effective February 21, 2013, the HLC has placed Ashford University on "Notice." "Notice" is an HLC sanction indicating that an institution is pursuing a course of action that, if continued, could lead it to be out of compliance with one or more Criteria for Accreditation.

An institution on Notice remains accredited.

In its Public Disclosure Notice, the HLC outlined the University's next steps:

The University has applied for accreditation by the Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities (WASC). The University is required to file a report with the HLC due July 10, 2013, regarding the outcome of that process. If the University does not achieve accreditation by WASC, the University is required to host a focused evaluation no later than October 1, 2013, to evaluate whether the University has completed specific steps, following its December 2012 plan, to establish jurisdiction with the HLC. The focused evaluation will also examine any issues identified by a WASC action, if any, in June 2013 denying initial accreditation. The University is also required to host a focused evaluation no later than December 15, 2013, to examine retention, graduation, and the University's progress in resolving the issues identified by the HLC in this action.

At its meeting in February 2014, the HLC will review the University's report and the reports of the evaluation teams and determine whether the University can be removed from Notice or whether probation or other action is appropriate if the College has not resolved the HLC's concerns that led to the imposition of Notice and demonstrated it is in compliance with all the Criteria for Accreditation.

Staff continues to monitor Ashford University's progress to substantively address student complaint issues that the Commission brought to the University's attention in its September 22, 2012 letter. These include, but are not limited to, the following:

- The University has completed processes to ensure that all undergraduate and graduate students start a program with books and materials.
- Based on the lack of student complaints over a notable period of time, staff is confident that the University maintains a compliant process for requesting proper student authorization to hold an excess of federal student aid funds, and works effectively with students who exercise their right to revoke that authorization.
- For students starting on or after November 13, 2012, the University implemented the "Ashford Promise," a conditional admission policy whereby all qualified students will be afforded a three (3) week trial period during which they will incur no financial liability unless they are admitted, matriculate, and attend beyond the third week of their first course.
- Ashford University is in the process of making system changes that will permit automated financial aid "packaging," thereby decreasing the delay between the beginning date of a student's attendance and the student's receipt of notification about estimated financial aid that is available to the student to pay incurred institutional charges
- Ashford University is in the process of implementing the Financial Aid Shopping Sheet developed by the federal Department of Education. This standardized award letter format will improve a student's understanding of his/her costs of attendance and options for paying those costs.
- Ashford University is in the process of evaluating changes that may be necessary to adopt an active confirmation process for federal student loan funds. Under this process, every student would be notified of the maximum federal student loan amount he or she is eligible to receive, asked to actively confirm that amount, and provided the opportunity to request a lesser amount.
- Ashford University and Commission staff will be meeting telephonically in the near future for further discussion about possible enhancements to the University's enrollment process

Student Complaints

During 2012, the Commission received 62 complaints from Ashford University students that required staff action. Complaints averaged over 5 per month. Staff perceived a decline in Ashford University student complaints beginning in December of 2012. As of the date of this summary, March 4, 2013, the last new Ashford University student complaint the Commission received was on January 8, 2013.

Iowa College Student Aid Commission

**ME&V Contract Extension
March 2013**

Recommended Action:

Authorize staff to exercise the option for a one-year extension of the Public Relations and Communication Services Contract with ME&V.

The Commission signed a contract in February 2009 for creative advertising, marketing, and consulting services for the Commission's Marketing Department. ME&V received a 28-month contract (March 1, 2009 – June 30, 2011) which permits three one-year renewals at the option of the Commission. In addition, the contract permits the Commission to direct work to ME&V during a two month transition period prior to or immediately following the term of the agreement.

Staff has been very pleased with ME&V's performance under this contract. Under this contract, ME&V has provided Commission staff with expertise and significant time savings in the areas of marketing and communications, including assistance with publications and public relations. This will be the last of the three extensions of the contract.

Iowa College Student Aid Commission

Printing, Storage and Distribution RFP March 2013

Recommended Action:

Authorize staff to issue a request for proposal for printing, storage and distribution of printed materials.

The Commission signed a contract in July 2008 for external printing and fulfillment services for the Commission's Marketing Department. The one-year contract (July 1, 2008- June 30, 2009) also permitted four one-year renewals at the option of the Commission. The last of the four one-year renewals expires on June 30, 2013.

Over the past five years, staff has been very pleased with the services provided through the printing, storage and distribution contract. It has provided significant time and money savings in the areas of printing, fulfillment management and fulfillment reporting.

Reasons to continue outsourcing the printing, storage and distribution of printed materials include:

- Inventory of Printed Materials
 - Prior to the contract, the Commission often had boxes of publications stacked to the ceiling. Our current workspace leaves little space for storing publications.
- Customers Place Orders Daily
 - Prior to the contract, one staff member was required to dedicate 30 hours per week on publication distribution, leaving little time for other job responsibilities. During peak fall season a temporary employee was also hired to fulfill orders. The cost to the agency for salary and benefits was estimated to be approximately \$40,000.
- On-line Order Form and Tracking
 - The contract included the development and support of an online order form for customers. Customers access the form from the Iowa College Aid website making it a seamless process. They receive a confirmation email for each order to let them know their order was received along with an order number for tracking purposes. The administration part of the order form enables staff to track inventory, orders and shipping. In addition, staff can easily add or remove publications from the order form.

- Quantity Price Breaks
 - Prior to the contract, state procurement rules required Commission staff to acquire three competitive bids for each print job. This not only took additional staff time, but also required staff to keep track of print jobs and deliveries from multiple printing sources.

The current contract has a maximum amount not to exceed \$200,000 for printing, storage and distribution.

A summary of expenses for printing, storage and distribution of publications so far to date for the 2012-2013 year is as follows:

\$70,860.00	Printing (Commission/IHAPI/GEAR UP)
\$1,000.00	Publication Storage/Annually
\$1,095.50	Web Hosting and Maintenance of Order Form
\$2,992.00	Order Fulfillment

In order to continue to benefit from outsourcing storage and distribution services, staff is requesting authorization to issue a request for proposal for printing, storage and distribution services.

A review of the proposals will be done by staff and a recommendation for board consideration will be delivered to Commissioners during the May 2013 meeting.

Iowa College Student Aid Commission

**Legislative Action Committee
March 2013**

A legislative report will be provided during the March 15, 2013 Commission Meeting.

**IOWA COLLEGE STUDENT AID COMMISSION
GUARANTEED STUDENT LOAN ADMINISTRATION
SUMMARY OF RESOURCES AND EXPENDITURES
SFY 2013 as of February 28, 2013**

Operating Fund	Class	FY 2013 Operating Budget	FY 2013 Year to Date Budget	FY 2012 Feb-12 Mth Actual	FY 2013 Feb-13 Mth Actual	FY 2012 Year to Date Actuals	FY 2013 Year to Date Actuals	YTD Actual to Budget Variance
Revenues/Resources:								
1	Federal Account Maintenance Fees (AMF)	4,197,366	3,148,025	423,338	-	1,325,947	355,086	(2,792,939)
2	Federal Loan Processing Fee (LPIF)	-	-	-	-	(5,253)	-	-
3	Default Aversion Fees (DAF) (Net of rebates)	-	-	62,445	-	807,494	503,485	503,485
4	ICSAC Share Default Collections *	-	-	1,610,587	354,945	8,231,591	3,819,995	3,819,995
5	Direct Loans Cons. (Net of 8.5% back to Fed Gov) *	-	-	99,069	-	900,676	232,135	232,135
6	Interest on Operating Fund	52,500	30,625	2,208	5,856	53,356	35,332	4,707
7	Other Revenue (includes TOP)	175,490	102,370	168,307	270	895,415	63,215	(39,155)
8	Est PLP Rev *	500,000	291,667	25,102	31,847	565,011	309,278	17,611
9	Intra-Agency Reimbursements	3,718,594	1,422,266	(110,749)	935,658	(110,750)	936,416	(485,850)
10	State Appropriation	-	-	-	-	141,589	-	-
Total Revenues/Resources		\$ 8,643,950	\$ 4,994,953	\$ 2,280,306	\$ 1,328,576	\$ 12,805,076	\$ 6,254,942	\$ 1,259,989
Expenditures:								
11	Agency Administration	1,885,339	1,140,993	105,579	82,486	825,233	721,689	(419,304)
12	Marketing Administration	544,831	327,404	7,899	18,325	106,128	215,487	(111,917)
Total Administrative		\$ 2,430,170	\$ 1,468,397	\$ 113,478	\$ 100,811	\$ 931,361	\$ 937,176	\$ (531,221)
13	Collection Expense	1,453,061	854,957	318,586	240,710	3,182,212	1,733,160	878,203
14	FFEL Expense	663,257	390,135	70,158	125,289	1,197,278	615,371	225,236
15	Collection Expense - PLP	137,500	80,208	11,915	6,322	104,155	103,440	23,232
Total Collection and FFEL Expenses		\$ 2,253,818	\$ 1,325,300	\$ 400,659	\$ 372,321	\$ 4,483,646	\$ 2,451,971	\$ 1,126,671
16	Grant Administration	2,278,482	2,031,998	(134,180)	212,824	(70,948)	251,922	(1,780,076)
17	Financial Literacy	30,000	17,500	(11,429)	19,786	20,271	244,786	227,286
18	IHAPI	1,402,804	836,566	(76,212)	539,340	143,509	766,510	(70,056)
Total Fin Literacy, IHAPI and Grant Expenditures		\$ 3,711,286	\$ 2,886,064	\$ (221,821)	\$ 771,949	\$ 92,832	\$ 1,263,217	\$ (1,622,847)
19	Osteopathic and Miscellaneous programs	0	0	0	0	0	0	-
20	Scholarship and Grants	735,648	433,935	(132,152)	210,267	(10,565)	340,155	(93,780)
21	Postsecondary Registration	304,917	184,493	(15,454)	34,078	49,186	86,041	(98,452)
Total Misc. (S&G, Postsecondary Reg, Osteo)		\$ 1,040,565	\$ 618,428	\$ (147,606)	\$ 244,345	\$ 38,621	\$ 426,196	\$ (192,232)
Total Operating Expenses		9,435,839	6,298,189	144,710	1,489,426	5,546,459	5,078,560	(1,219,629)
22	Federal Default Fee	0	0	0	0	0	0	-
Total Federal Default Fee		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Net resources (exp) before other		\$ (791,889)	\$ (1,303,236)	\$ 2,135,596	\$ (160,851)	\$ 7,258,617	\$ 1,176,382	\$ 2,479,618
Other Resources (Grant Drawdown)								
23	Gear Up Grant DrawDown	2,800,000	2,216,667	95,412	-	536,606	-	(2,216,667)
24	College Access Grant Funds	1,000,000	583,333	-	-	488,676	-	(583,333)
25	JR Justice	121,000	121,000	-	1,589	100,000	3,864	(117,136)
Total Other Resources		\$ 3,921,000	\$ 2,921,000	\$ 95,412	\$ 1,589	\$ 1,125,282	\$ 3,864	\$ (2,917,136)
Other Expenditures (grants)								
25	Gear Up Grant	2,933,156	2,303,010	71,796	186,948	578,957	912,021	(1,390,989)
26	College Access Challenge Grant	1,000,000	583,333	(8,737)	0	902,806	0	(583,333)
27	JR Justice	121,000	121,000	(15,000)	0	70,000	2,276	(118,724)
Total Other Expenditures		\$ 4,054,156	\$ 3,007,343	\$ 48,059	\$ 186,948	\$ 1,551,763	\$ 914,297	\$ (2,093,046)
Net Other Income		\$ (133,156)	\$ (86,343)	\$ 47,353	\$ (185,359)	\$ (426,480)	\$ (910,433)	\$ (824,090)
Net Gain(Loss)Operating Fund		\$ (925,045)	\$ (1,389,579)	\$ 2,182,949	\$ (346,210)	\$ 6,832,136	\$ 265,948	\$ 1,655,527

Footnotes:

4 - Includes FFELP Collections and Great Lakes Payments

5 - Estimated revenue; net number (10% of rehabs) based on total receipts from USDE (18.5%) less payments to USDE (8.5%)

8 - Total cash receipts, includes principal and interest

**IOWA COLLEGE STUDENT AID COMMISSION
FUND 0163 - YEAR TO DATE UNIT DETAIL
SUMMARY OF RESOURCES AND EXPENDITURES
SFY 2013 as of February 28, 2013**

Operating Fund	Class	UNIT 2001 ADMIN	UNIT 2002 MARKETING	UNIT 2004 MISC	UNIT 3003 COLLECTIONS	UNIT 3004 FFEL	UNIT 4001 JR JUSTICE	UNIT 5002 S&G	UNIT 5003 POSTSEC REG	UNIT 7001 GRANT ADMIN	UNIT 7002 FIN LIT	UNIT 7003 IHAPI	UNIT 7007 CACG	UNIT 8008 PLP	UNIT 9009 GEAR UP	YTD ACTUAL TOTAL	YTD BUDGET TOTAL	YTD Actual to Budget Variance	
Revenues/Resources:																			
1	Federal Account Maintenance Fees (AMF)	-	-	-	-	355,086	-	-	-	-	-	-	-	-	-	355,086	3,148,025	(2,792,939)	
2	Federal Loan Processing Fee (LPIF)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Default Aversion Fees (DAF) (Net of rebates)	-	-	-	-	503,485	-	-	-	-	-	-	-	-	-	503,485	-	503,485	
4	ICSAC Share Default Collections *	-	-	-	2,193,227	1,626,768	-	-	-	-	-	-	-	-	-	3,819,995	-	3,819,995	
5	Direct Loans Cons. (Net of 8.5% back to Fed Gov) *	-	-	-	232,135	-	-	-	-	-	-	-	-	-	-	232,135	-	232,135	
6	Iowa Access Grants Funds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Interest on Operating Fund	-	-	-	-	35,332	-	-	-	-	-	-	-	-	-	35,332	30,625	4,707	
8	Other Revenue (includes TOP)	1,518	-	1,621	59,973	-	-	-	-	-	-	-	-	-	103	63,215	102,370	(39,155)	
9	Est. PLP Rev *	-	-	-	-	-	-	-	-	-	-	-	-	309,278	-	309,278	291,667	17,611	
10	Intra-Agency Reimbursements	720,171	215,487	-	-	-	-	758	-	-	-	-	-	-	-	936,416	1,422,266	(485,850)	
11	Grant DrawDown from USDE	-	-	-	-	-	3,864	-	-	-	-	-	-	-	-	3,864	2,921,000	(2,917,136)	
12	State Appropriation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Total Revenues/Resources		\$ 721,689	\$ 215,487	\$ 1,621	\$ 2,485,335	\$ 2,520,671	\$ 3,864	\$ 758	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 103	\$ 6,258,806	\$ 7,915,953	\$ (1,657,147)	
Expenditures:																			
13	Personal Services - Loan Administration	511,387	105,309	-	386,260	197,820	-	135,975	60,333	45,201	-	239,234	-	-	165,046	1,846,565	1,970,311	(123,746)	
14	Travel	7,663	23,004	-	-	-	-	3,590	123	-	-	2,008	-	15,376	51,764	83,165	83,165	(31,401)	
15	Office Supplies	15,934	396	-	165	-	-	163	-	-	-	345	-	551	17,554	12,841	4,713	(758)	
16	Equipment Repairs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	758	-	
17	Printing and Binding	68	53,552	-	-	-	-	554	-	-	-	7,413	-	-	6,130	67,717	117,351	(49,634)	
18	Food	143	-	-	-	-	-	-	-	-	-	-	-	-	143	58	58	85	
19	Postage	6,286	12,101	-	843	20	-	1,564	-	-	-	-	-	202	12,401	33,417	22,716	10,701	
20	Communications	13,410	-	-	1,440	201	-	1,583	-	-	-	3,204	-	-	5,612	25,450	27,521	(2,071)	
21	Rentals	-	-	-	-	-	-	-	-	-	-	-	-	-	4,553	4,553	-	4,553	
22	Professional & Scientific Services	3,948	1,000	-	-	20,247	-	-	-	-	-	640	-	-	5,000	30,835	30,654	181	
23	Outside Services - SLMA	-	-	-	-	279,858	-	-	-	-	-	-	-	-	-	279,858	245,215	34,643	
24	Outside Services - iLink	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
25	Outside Services - SLCS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
26	Outside Services - Other	279	-	-	1,117,202	-	-	3,414	-	-	-	-	-	78,838	-	1,199,733	607,496	592,237	
27	Intra-State Transfers	790	-	-	-	-	-	-	-	-	-	-	-	-	40,276	41,066	88,232	(47,166)	
28	Advertising & Publicity	-	18,208	-	-	-	-	-	-	-	-	500	-	549,090	567,798	365,998	201,800		
29	Attorney General	8,750	-	-	20,186	-	-	-	-	-	-	-	-	-	-	28,936	13,694	15,242	
30	State Audits	18,704	-	-	-	-	-	-	-	-	-	-	-	-	-	18,704	19,906	(1,202)	
31	State Reimbursements - Rent	33,571	-	-	-	-	-	-	-	-	-	-	-	-	-	33,571	-	33,571	
32	State Reimbursements - Other	7,247	452	-	339	1,130	-	452	113	-	-	339	-	-	498	10,570	49,496	(38,926)	
33	ITE Reimbursements	52,756	643	-	2,321	2,221	-	462	266	-	-	739	-	-	644	60,052	94,222	(34,170)	
34	Intra-Agency Reimbursements	-	-	-	203,448	113,874	2,276	192,206	25,206	206,721	19,786	137,088	-	-	37,776	938,381	1,409,785	(471,404)	
35	Equipment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
36	Office Equipment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
37	IT Equipment & Software	38,771	50	-	-	-	-	192	-	-	-	-	-	-	29,068	68,081	130,609	(62,528)	
38	Other Expenses & Obligations	854	772	-	75	-	-	-	-	-	-	-	-	-	-	1,701	1,666	35	
39	Licenses	-	-	-	-	-	-	-	-	-	225,000	375,000	-	-	40,000	640,000	769,755	(129,755)	
40	Other Refunds	1,128	-	-	881	-	-	-	-	-	-	-	-	24,400	-	26,409	53,083	(26,674)	
41	State Aid	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3,191,000	(3,191,000)	
Total Administrative		\$ 721,689	\$ 215,487	\$ -	\$ 1,733,160	\$ 615,371	\$ 2,276	\$ 340,155	\$ 86,041	\$ 251,922	\$ 244,786	\$ 766,510	\$ -	\$ 103,440	\$ 912,021	\$ 5,992,858	\$ 9,305,532	\$ (3,312,674)	
Total Expenditures		\$ 721,689	\$ 215,487	\$ -	\$ 1,733,160	\$ 615,371	\$ 2,276	\$ 340,155	\$ 86,041	\$ 251,922	\$ 244,786	\$ 766,510	\$ -	\$ 103,440	\$ 912,021	\$ 5,992,858	\$ 9,305,532	\$ (3,312,674)	
Net Gain(Loss)Operating Fund		\$ (0)	\$ -	\$ 1,621	\$ 752,175	\$ 1,905,300	\$ 1,588	\$ (339,397)	\$ (86,041)	\$ (251,922)	\$ (244,786)	\$ (766,510)	\$ -	\$ 205,838	\$ (911,918)	\$ 265,948	\$ (1,389,579)	\$ 1,655,527	

Footnotes:

- 4 - Includes FFELP Collections and Great Lakes Payments
- 5 - Estimated revenue; net number (10% of rehabs) based on total receipts from USDE (18.5%) less payments to USDE (8.5%)
- 9 - Total cash receipts, includes principal and interest

IOWA COLLEGE STUDENT AID COMMISSION
SCHOLARSHIP & GRANT ADMINISTRATION
SUMMARY OF EXPENDITURES
SFY 2013 as of February 28, 2013

State Appropriated - \$232,943

	FY 2012	FY 2013	FY 2013	FY 2013	Variance
	Actual	Budget	Year to Date	Year to Date	Over
	Actual	Budget	Budget	Actual	(Under)
Expenditures:					
1 Salaries	\$ 219,455	\$ 232,510	143,191	\$ 156,156	\$ 12,965
2 Travel	335	433	172	-	(172)
3 Office Supplies	1,445	-	-	-	-
4 Equipment Repairs	52	-	-	-	-
5 Printing	2,058	-	-	-	-
6 Postage	3,672	-	-	-	-
7 Communications	2,381	-	-	-	-
8 Rental	5,588	-	-	-	-
9 Professional Services	60	-	-	-	-
10 Outside Services	3,653	-	-	-	-
11 State Transfers	75	-	-	-	-
12 State Reimbursements - Rent	3,479	-	-	-	-
13 State Reimbursements	1,469	-	-	-	-
14 ITD Reimbursements	6,165	-	-	-	-
15 Office Equipment	-	-	-	-	-
16 IT Equipment & Software	-	-	-	-	-
17 Other Expenses & Obligations	9	-	-	-	-
Total Expenditures	\$ 249,896	\$ 232,943	\$ 143,363	\$ 156,156	\$ 12,793

Notes:

1 - FY2013 Budget covers as many salary and benefit costs as possible, with remainder to travel. FY2012 budget was done with a different assumption.

Non Appropriated (Covered by GSL)

	FY 2012	FY 2013	FY 2013	FY 2013	Variance
	Actual	Budget	Year to Date	Year to Date	Over
	Actual	Budget	Budget	Actual	(Under)
Resources:					
18 Intra-agency Reimbursements	-	-	-	\$ 758	\$ 758
Total Resources	\$ -	\$ -	\$ -	\$ 758	\$ 758
Expenditures:					
19 Salaries	-	351,674	234,449	135,975	(98,474)
20 Travel	-	2,275	1,517	3,590	2,073
21 Office Supplies	-	-	-	163	163
22 Equipment Repairs	-	-	-	-	-
23 Printing	-	-	-	554	554
24 Postage	-	-	-	1,564	1,564
25 Communications	-	2,774	1,850	1,583	(267)
26 Rental	-	-	-	-	-
27 Outside Services	-	-	-	3,414	3,414
28 State Transfers	-	-	-	-	-
29 State Reimbursements - Rent	-	-	-	-	-
30 State Reimbursements	-	1,820	1,213	452	(761)
31 ITD Reimbursements	-	1,425	950	462	(488)
32 Intra-Agency Reimbursements	-	327,624	218,416	192,206	(26,210)
33 Office Equipment	-	-	-	-	-
34 IT Equipment & Software	-	-	-	192	192
35 Other Expenses & Obligations	-	-	-	-	-
Total Expenditures	\$ -	\$ 687,592	\$ 458,395	\$ 340,155	\$ (118,240)

Notes:

18 - Intra-Agency reimbursements (resources) reflects reimbursement received from JR Justice grant; represents salaries and benefits costs reimbursement.
32 - Intra-Agency reimbursements reflects the charges for Administration and Marketing for ICSAC. Charges are allocated based on budgeted FTE count.

Total Expenditures (Appropriated + NonAppropriated)

	FY 2012	FY 2013	FY 2013	FY 2013	Variance
	Actual	Budget	Year to Date	Year to Date	Over
	Actual	Budget	Budget	Actual	(Under)
Resources:					
36 Intra-agency Reimbursements	\$ -	\$ -	\$ -	\$ 758	\$ 758
Total Resources	\$ -	\$ -	\$ -	\$ 758	\$ 758
Expenditures:					
37 Salaries	\$ 219,455	\$ 584,184	\$ 377,640	\$ 292,131	\$ (85,509)
38 Travel	335	2,708	1,689	3,590	1,901
39 Office Supplies	1,445	-	-	163	163
40 Equipment Repairs	52	-	-	-	-
41 Printing	2,058	-	-	554	554
42 Postage	3,672	-	-	1,564	1,564
43 Communications	2,381	2,774	1,850	1,583	(267)
44 Rental	5,588	-	-	-	-
45 Outside Services	60	-	-	3,414	3,414
46 State Transfers	3,653	-	-	-	-
47 State Reimbursements - Rent	75	-	-	-	-
48 State Reimbursements - Other	3,479	1,820	1,213	452	(761)
49 ITD Reimbursements	1,469	1,425	950	462	(488)
50 Intra-Agency Reimbursements	6,165	327,624	218,416	192,206	(26,210)
51 Office Equipment	-	-	-	-	-
52 IT Equipment & Software	-	-	-	192	192
53 Other Expenses & Obligations	9	-	-	-	-
Total Expenditures	\$ 249,896	\$ 920,535	\$ 601,758	\$ 496,311	\$ (105,447)
Net Resources (Expenditures)	(249,896)	(920,535)	(601,758)	(495,553)	106,205

**IOWA COLLEGE STUDENT AID COMMISSION
 DEFAULT PREVENTION, FUND #0261
 SUMMARY OF RESOURCES AND EXPENDITURES
 SFY 2013 as of February 28, 2013**

	FY 2013 Budget	FY 2013 Year to Date Budget	FY 2013 Year to Date Actuals	Variance
Resources:				
Interest	4,200	2,800	2,690	(110)
Refunds & Reimbursements	0	0	0	0
Total Resources	4,200	2,800	2,690	(110)
Expenditures:				
Travel/State Vehicle	0	0	0	0
Office Supplies	0	0	0	0
Printing & Binding	0	0	0	0
Professional & Scientific Services	0	0	0	0
Outside Services	0	0	0	0
Advertising & Publicity	0	0	0	0
ITD Reimbursement	0	0	0	0
Licenses	150,000	100,000	150,000	50,000
Aid to Individuals	0	0	0	0
Total Expenditures	150,000	100,000	150,000	50,000
Net Gain(Loss)	(145,800)	(97,200)	(147,310)	(50,110)
Default Prevention Cash Balance 6/30/12	1,594,173			
Net Gain/(Loss) SFY 2013 02/28/2013	(147,310)			
Cash Balance 02/28/2013	1,446,863			



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