

**Iowa College Student Aid Commission  
November 16, 2012**



# 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

November 16, 2012

10:00 AM

Iowa College Student Aid Commission  
Conference Room

- \* 1. Minutes of Meeting ..... Tab A
  - September 21, 2012 Commission Meeting
- 2. Executive Director’s Report ..... Tab B .....Misjak
- \* 3. Consent Agenda ..... Tab C
  - a. Postsecondary Registration
    - Colorado State University – Global Campus (12-11-C1)
    - Mt. Carmel School of Nursing (12-11-C8)
    - Bellevue University (12-11-C14)
    - INSTE Bible College (12-11-C22)
    - Kaplan University (12-11-C29)
- 4. Ashford University Discussion..... Tab D .....Small
- 5. Committee Reports ..... Tab E
  - \*- Legislative Committee Report..... Adams
- 6. Adjourn

\* Indicates Action Item

Upcoming Meetings:

Unless otherwise indicated, meetings will begin at 10:00 a.m. and conclude by 2:00 p.m.

January 18, 2013

March 15, 2013

May 17, 2013

**IOWA COLLEGE STUDENT AID COMMISSION**

**MINUTES OF MEETING**

**September 21, 2012**

**10:00 a.m.**

**Iowa College Student Aid Commission  
603 East 12<sup>th</sup> Street, 5<sup>th</sup> Floor, Des Moines, Iowa 50319  
Conference Room**

**Members Present:**

Janet Adams	Rob Denson
Bob Donley	Crystal Ford
Colleen Hunt	Ron Jorgensen
Fred Moore	Doug Shull
Elizabeth Sullivan	Cindy Winckler

**Members Absent:**

Roger Claypool	Randy Feenstra
Herman Quirnbach	Karolyn Wells

**Staff Present:**

Nancy Ankeny	Todd Brown
Tony Girardi	Deb Krueger
Julie Leeper	Karen Misjak
Julie Ntem	Carolyn Small
Ashley Wendt	

**Attorney General Present:**

David VanCompernelle

**Guests Present:**

Wanda Boatwright	Ashford University
Heather Gaumer	Simpson College\ IASFAA
Michael Gonzalez	Viterbo University
Robin Madison	Legislative Services Agency
Dawn Nardini	Ashford University
John Parker	Iowa Student Loan
Linda Schwinn	Capri College
Cindy Amyot	University of Missouri-Kansas City

## **Call to Order**

The Iowa College Student Aid Commission met for a regularly scheduled meeting on September 21, 2012. Commission Chair Adams called the meeting to order at 10:00 a.m. with a quorum present.

## **Meeting Minutes July 13, 2012**

Motion: Commissioner Moore moved to approve the July 13, 2012 Meeting Minutes as written. Commissioner Donley seconded the motion which passed unanimously.

## **Executive Director's Report**

Ms. Misjak said Great Lakes moved all paper documents from the Commission and we are working closely with the U.S. Department of Education to meet record retention requirements. The Federal Fund will be transferred to Great Lakes once the Department verifies the balances and a small portion of the fund will be maintained for outstanding warrants for a 6 month time period.

Staff will have view only access to the Sallie Mae system beginning October 1, 2012 until November 30, 2012. Sallie Mae sent a letter outlining the costs associated with the remainder of the contract period. Great Lakes agreed to pay the October and November monthly charges and the deconversion charges in the payment agreement. The letter in the board book will not be signed after it was determined that the conditions in the letter were covered under the Sallie Mae Contract.

Ms. Misjak reports that State Auditors are currently in the office and have to provide audited financial statements to the USDE at the end of the year for SFY12. The Commission will have to provide the financial statements for SFY13 to cover the three months prior to the transfer of the portfolio.

The Commission will not receive the College Access Challenge Grant for 2012-13 because the State did not meet Maintenance of Effort requirements. Since the State of Iowa has a rainy day account, USDE requested the Governor to backfill funding to meet the requirements. Commissioner Winckler asked if a supplemental could be done in January, however the amount needed to meet the MOE is over \$2 million in support of financial aid for students attending private institutions of higher education and over \$42 million in support of public institutions of higher education.

Ms. Misjak said there were two applicants that qualified under the Iowa Grant for students of deceased public workers.

Commissioners were given the Audit Report for June 2011. The findings in the report were due to data entry errors and have been corrected.

The Commission's layoff plan will be final on September 27, 2012. Deb Krueger has resigned and her last day will be the same day.

Chair Adams thanked all of the staff for their hard work during this difficult time and wished the departing staff well.

### **Consent Agenda**

Motion: Commissioner Donley moved to approve the Consent Agenda items as listed. Commissioner Ford seconded the motion which passed unanimously.

### **State FY 2014 and 2015 Budgets**

Mr. Girardi presented Commissioners with statistical information regarding state need-based student aid and postsecondary access. Commissioner Winckler said the more educated a community is the greater impact there is on economic growth.

Staff will be submitting a status quo budget as requested by the Governor's office. The Legislative Committee believes it was effective last year when Commissioners presented at the budget hearing and requested increased appropriations for programs. Ms. Leeper said the Legislative Committee will meet a few more times prior to the November Commission meeting. During the Commission meeting, the Legislative Committee will present its recommendation for what Commissioners should request during the Commission's budget hearing with the Governor.

Chair Adams is concerned with the recommendation that funding for the for-profit Iowa Tuition Grant Program remain at the current level. She asked whether Commissioners believe they should single out this Program, and expressed concern over how this action could impact students. Commissioner Donley said tuition throughout the state is increasing and, if grant awards are not increased by at least some fraction, students will be held back from gaining access to postsecondary education. Commissioner Donley felt the Commission should entertain asking for an increased appropriation. The federal discussion about the students who attend for-profit universities is unclear. Commissioner Donley would not support excluding the for-profits from budget increases that the Commission will propose. Chair Adams feels that students in all sectors should be supported.

Commissioner Winckler thought it would be realistic to determine the administrative costs associated with administering the programs and that it is important that the state pay for the administration of programs which it supports. With revenue significantly decreased from other sources for the Commission, it is important to have this conversation now.

Commissioner Denson said that maybe holding the for-profit institutions level is appropriate. He noted that the Commission is responsible for the registration of postsecondary institutions in Iowa and decides what educational institutions may provide education to students in our state. He felt there is credible evidence that there are problems in the for-profit sector and the Commission must ensure that it is protecting Iowa students. An appropriate response is

needed, so there is not criticism of the Commission with respect to postsecondary registration and protection of Iowa students. Chair Adams feels an addendum can be included in the budget requests to address the for-profit institutions. She also noted that she is aware that the Consumer Protection Division of the Attorney General's Office is currently investigating some for-profit institutions in the state.

Commissioner Moore said that institutions are required to provide a significant amount of information when registering in this state. Commissioner Donley asked if there is a rationale that the Commission has come up with that allows Commissioners to make informed decisions in terms of consumer protection. He felt that additional criteria may be needed. He also noted that while the law provides explanatory language, the Commission has no real sanction authority. Some states have entire departments overseeing registrations in their states and are receiving millions of dollars to fund departments.

Commissioner Donley said he would like to have more information by the November Commission meeting regarding the criteria that is being used to register institutions in Iowa, and felt it might be appropriate to ask the Higher Learning Commission what they use in their accreditation standards. Commissioner Donley said this information may be useful to Commissioners in deciding whether to request an increase for the for-profit Iowa Tuition Grant Program.

Ms. Misjak said student complaints are documented and that staff works with the Consumer Protection Division at the Attorney General's office.

### **XAP Contract Amendment**

Motion: Commissioner Donley moved to authorize staff to approve the amendment to the Community Center Web Portal Contract with XAP Corporation. Commissioner Ford seconded the motion which passed unanimously.

### **Staff Reports**

Ms. Kruger presented the FY 2012 Revenue and Expenditure Summary.

Ms. Ankeny provided a report on I Have A Plan Iowa™. A comparison of all charts was provided to show the growth and usage of the program.

Mr. Brown presented an evaluation of the Iowa Grant Program.

Commission adjourned at 12:02 p.m.

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JANET ADAMS, CHAIR

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CRYSTAL FORD, VICE CHAIR

## **IOWA COLLEGE STUDENT AID COMMISSION**

### **Executive Director's Report November 2012**

#### **Iowa Building Demolition**

The Department of Administrative Services (DAS) contacted us regarding the demolition of the Iowa Building. Their goal is to demolish the building on or before July 2013. DAS has provided us with numerous possibilities to relocate, all of which are not on the state capitol complex. We currently pay \$3.46 per square ft., and we will be looking at spending between \$12-\$14 per square ft. off of the complex.

We moved to this location in October 2010 to decrease the cost of rent for our agency. We spent approximately \$500,000 to renovate the space. DAS will assist with the transition to a new space and will not charge us for any renovations or moving expense. The expense to rent will increase significantly and was not allowed for in our current budget.

#### **College Week Live**

To kick off College Application Week, Iowa College Aid hosted a virtual "Get Prepped 4 College" event at College Week Live on Monday, October 29, 2012. A total of 143 students logged in during the event to hear from financial aid and admissions experts, chat live with college students and explore exhibit booths for college planning information.

The live presentations, listed below, were conducted by members of the College Application Week steering committee. Recorded versions of the presentations will be added to the IowaCollegeAid.gov website for anyone to view and access.

12:00 College Search 101: Year by Year Outline, by Todd Coleman, Wartburg College

1:00 Financial Aid 101: FAFSA and Beyond, by Nancy Ankeny, Iowa College Aid/Iowa Department of Education

2:00 College Checklist, by Jamie Rathjen, University of Northern Iowa

3:00 Frequently Unasked Questions, by Ali Schlapkohl, Drake University

4:00 State Scholarships and Grants, by Julie Voss, Iowa College Aid

5:00 Why Apply to College Now? by Katie Heither, Grand View University

## IOWA COLLEGE STUDENT AID COMMISSION

### Colorado State University – Global Campus Application for Postsecondary Registration in Iowa November 2012

#### **RECOMMENDED ACTION:**

***Approve the Iowa registration request of Colorado State University – Global Campus (CSU – Global) with a waiver of the full-time Iowa-based faculty member/program coordinator requirement.***

As a condition of registration:

- By the beginning of the fall 2013 term, the University 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: Per changes in Iowa Code Section 261B.3 effective July 1, 2012, CSU Global's registration period is 2 years.**

#### **Registration Purpose**

Revised Iowa Code Section 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. 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, with the exception of proctored examinations. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations.

Staff instructed CSU – Global to apply for registration in Iowa in order to continue providing distance education programs because the University employs four online instructors who work for the University remotely from their Iowa homes or other Iowa locations.

#### **Institutional Information**

CSU – Global is a purely online, public institution that was created by an Act of the Colorado General Assembly in 2009. Colorado law designates CSU – Global an undergraduate degree-completion institution, and authorizes it to offer master's level programs. The University is under the control and supervision of the Board of Governors of the Colorado State University System. Its administrative facility is located at 8000 E Maplewood Ave., Suite 5-250, Greenwood Village, CO. The chief executive officer of the school is Dr. Becky Takeda-Tinker at the same address. The University is not registered with the Iowa Secretary of State as an entity conducting business in Iowa because it is a division of the State of Colorado.

A student must transfer in at least 12 credit hours for admission to CSU – Global and may transfer in as many as 90 credit hours.

*Accreditation:* CSU – Global is regionally accredited by the Higher Learning Commission (HLC). In 2011, the HLC accredited CSU – Global independently of its ground-based, “sister” school Colorado State University.

*Federal Stafford Loan Cohort Default Rate (FFY 2010):* 2.9%. For comparison purposes, the FFY 2010 national average cohort default rate is 9.1%.

*Graduation Rate:* No data. The graduation rate is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion, as reported to the federal Department of Education. CSU – global is a degree completion institution that does not accept first-time students. All applicants must have at least 12 transfer credits when they begin attendance at the University.

Since CSU – Global students may transfer in from 12 to 90 credits, the University reports that it is difficult to track graduation rates based on a normal time for program completion. CSU – Global provided the following information about the percentage of students who began attendance at the institution historically and who have since graduated from a University program:

Fall 2008: 35%  
Spring 2009: 39%  
Fall 2009: 41%

*Average Loan Debt Upon Graduation:* \$16,934 for undergraduate students; \$26,722 for graduate students.

*Record Preservation:* As part of the Colorado State University System, the System would preserve the records of CSU – Global Campus in the unlikely event that the institution should cease operation.

*Transcript Requests:* To order an official transcript, students must submit a signed Transcript Request Form through their Student Portal. Students who are unable to submit the form through the portal should contact their advisor with questions. Verbal, email, and mail transcript requests are not accepted. CSU - Global’s preferred transcript delivery method is through Scrip-Safe International, a secure, electronic service.

*Student Learning Resources:* CSU – Global provides its nontraditional students with services to meet their educational needs including 24/7, real-time tutoring via qualified instructions/tutors; 24/7 technical support via real-time, qualified support representatives; trained, highly responsive course instructors who respond within 24 hours of student contact and provide a 72-hour grading turnaround; 24/7 online library access with key databases to support the curriculum; a career center; student skills workshops; and student feedback and surveys. The online library service known as Jones e-Global Library offers a wide range of services, including access to databases and e-books as well as to meta-links for journals, articles, and other subscriptions. The e-Global Library service provides real-time access to reference Librarians 24/7 through the Ask-A Librarian chat service. CSU – Global campus librarians may also be contacted during normal work-week business hours 8 a.m. to 5 p.m., by e-mail, telephone, or Pronto instant messaging.

*Curriculum Evaluation and Development:* Each academic program has a faculty program coordinator responsible for curriculum and assessment. The University has a curriculum sub-committee responsible for approving new programs. This sub-committee is comprised of program coordinators. The sub-committee receives or initiates recommendations pertaining to all courses and programs offered for credit at CSU – Global, evaluates all proposals for new or existing curriculum, and drafts policies relating to the operations or any area that impacts curricula. Recommendations forwarded from the curriculum sub-committee are advanced to the Academic Operations Committee and the University Provost. New programs that are approved at this level are then reviewed by the Governance Council, Colorado System Board of Governors, Colorado Commission of Higher Education, and the Higher Learning Commission.

*Student Complaints Process:* Students who believe that a staff or faculty member has failed to apply University policy or procedures are strongly encouraged to first speak directly with the party involved to seek resolution. If resolution is not achieved, students may file a written complaint with the Office of Student Success, who investigates each complaint, within four weeks following the end of the term in which the issue occurred. The student's concern may be reviewed by the Grievance Committee as recommended by the Manager of Academic Success or the Provost. The student is notified of the findings and any steps to be taken regarding the resolution no later than three weeks after receipt of the complaint. If the student wishes to appeal the decision, he/she may appeal to the Provost, in writing, no later than two weeks after receipt of the decision. CSU – Global discloses its student complaint process in its Academic Catalog at <http://csuglobal.blackboard.com/bbcswebdav/institution/public/Academics/Catalog/CSU-Global%20Academic%20Catalog>

## **Programs Offered In Iowa**

*Baccalaureate Degree Programs* - \$48,432 maximum per program for all baccalaureate degree programs (a student must transfer in at least 12 credit hours for admission and may transfer in as many as 90 credit hours). This amount includes books, supplies, and tuition. There are no fees.

- Bachelor of Science in Accounting
- Bachelor of Science in Applied Social Sciences
- Bachelor of Science in Business Management
- Bachelor of Science in Communication
- Bachelor of Science in Criminal Justice and Law Enforcement Administration
- Bachelor of Science in Healthcare Administration and management
- Bachelor of Science in Information Technology
- Bachelor of Science in Interdisciplinary Professional Studies
- Bachelor of Science in Organizational Leadership
- Bachelor of Science in Public management

*Graduate Degree Programs* - \$21,216 per program for all graduate degree programs. This amount includes books, supplies, and tuition. There are no fees.

- Master of Science in Management
- Master of Science in Organizational Leadership
- Master of Science in Teaching & Learning (non-licensure). Through an articulation agreement with Western State University, students may transfer to Western State University to earn a

teaching license, however, the University's program is not a teacher preparation program and the CSU – Global website explicitly states that the license earned at Western State University is a Colorado Teaching License <http://csuglobal.edu/degree-programs/master-degrees/education/teacher-licensure/>

- Master of Criminal Justice and Law Enforcement Administration
- Master of Healthcare Administration and Management

*Graduate Certificate Programs* - \$7,072 for all certificate programs. This amount includes books, supplies, and tuition. There are no fees.

*Note: students enrolled in these professional development programs are classified as non-degree seeking students and therefore none of these programs are eligible for financial aid.*

- Applied Business Management
- Criminal Justice Leadership
- English Language Learning
- Finance
- Healthcare Administration
- Human Resource Management
- Information Technology
- International Management
- Online Teaching
- Organizational Leadership and Change Management
- Organizational Training and Instructional Design
- Strategic Innovation and Change Management
- Teacher Leadership

CSU – Global's Tuition Guarantee program <http://csuglobal.edu/tuition-and-financial-info/tuition-guarantee/> promises that the cost of a student's online courses remain the same through the student's entire degree program, provided the student remains continuously enrolled and in good academic standing.

## **Registration Compliance**

As required by Iowa Code Section 261B.4, CSU – Global disclosed its policy on refunding tuition charges for withdrawn students. The policy is disclosed in the University's academic catalog at <http://csuglobal.blackboard.com/bbcswebdav/institution/public/Academics/Catalog/CSU-Global%20Academic%20Catalog>

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. CSU – Global maintains these policies and discloses them in the academic catalog and Crime Statistics and Safety Report at:

- ✓ <http://csuglobal.blackboard.com/bbcswebdav/institution/public/Academics/Catalog/CSU-Global%20Academic%20Catalog>
- ✓ [http://csuglobal.blackboard.com/bbcswebdav/institution/public/Academics/saftey\\_csugc.pdf](http://csuglobal.blackboard.com/bbcswebdav/institution/public/Academics/saftey_csugc.pdf)

- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy concerning tuition and mandatory fee charges for members of the Iowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member has been called to active (Iowa) state or federal military duty or service. Staff thoroughly reviewed and discussed with University representatives the meaning of the text of CSU – Global’s policy for addressing cases when a student who is the deployed servicemember or the deployed servicemember’s spouse must withdraw because of a call to active duty. CSU – Global’s policy states that a student “. . . should file a tuition appeal before requesting a refund. Each case will be reviewed and a decision made to ensure that students will not be unjustly penalized financially.” CSU – Global staff assure Commission staff in writing that the University intends no impediment to the student’s receipt of a full refund if it is the student’s desire not to complete a course at a later date. Staff are advised that CSU – Global’s policy is intended to provide students the opportunity for counseling with the University’s military team to ensure that the student understands the full financial impact of withdrawal on all financial aid or other benefits that have a financial impact on the student. The University assures Commission staff that it will grant a withdrawn student’s request for a full refund of tuition for a course the student does not intend to complete. The University has no mandatory fees. The University discloses its policy on military withdrawal in its academic catalog  
<http://csuglobal.blackboard.com/bbcswebdav/institution/public/Academics/Catalog/CSU-Global%20Academic%20Catalog>
- 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.

The Commission created a task force comprised of Iowa-based school representatives and Commission staff to study the statutory requirement and determine whether any state-wide consensus could be achieved on the definition of key terms that are defined in the new law, and guidelines for the new policy. The task force has completed its work and a copy of its recommendations was provided to CSU – Global. However, staff believe that the Commission should 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, CSU – Global 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 is disclosed to students in the University's catalog at <http://csuglobal.blackboard.com/bbcswebdav/institution/public/Academics/Catalog/CSU-Global%20Academic%20Catalog>

CSU – Global 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 this information in its catalog and on its website.

*Financial Responsibility:* CSU Global submitted an independent financial audit report dated November 30, 2011, for the Colorado State University System conducted by BKD, LLP, for the System's fiscal years ending June 30, 2011 and 2010. The auditing firm expressed an unqualified opinion on the System's financial statements. There were no material weaknesses in internal control over financial reporting, and no instances of noncompliance considered material in the financial statements disclosed by the audit. Public institutions are not required to calculate a composite score and report that score to the U.S. Department of Education.

*Full-Time Iowa Resident Faculty Member or Program Coordinator:* CSU – Global does not comply with the requirement of administrative rule to employ at least one full-time Iowa-resident faculty member or program coordinator. The University does employ four Iowa-resident, part-time instructors in its online programs, who work remotely from their Iowa home or other Iowa location:

- Anne O'Bryan, Ph.D – teaches education courses
- Daniel Hand, Masters in Science – teaches biology
- Isabel Wan, Ph.D. – teaches organization leadership courses
- Jill Bale, Ph.D. – teaches finance

*Instructional/Supervisory Staff Qualifications:* CSU – Global discloses the resumes of all faculty at <http://csuglobal.edu/about-us/our-faculty/>. Of 58 faculty members, all are master's level graduates and the vast majority hold an earned doctorate. Many have significant teaching and/or professional experience. The University also included in its registration application its seven-step faculty hiring and preparation process. Terminal degrees and applied business experience are preferred. All prospective employees must undergo a background check, including a criminal background check. All applicants must undergo a faculty certification to ensure that they have the skills to teach online and understand academic and personnel policies. For the first course, a peer mentor is assigned to work with new faculty over the course of an 8-week term. The mentor evaluates the new faculty member at the completion of the course. If the evaluation is positive, the faculty member will continue to be engaged as

a faculty member. Faculty undergo annual evaluations that include data from end-of-course surveys, peer mentors and formal evaluation by faculty development coordinator service. CSU – Global also conducts random and periodic evaluation of faculty by observing class activities. Spot evaluations or additional mentoring may be implemented if there are problems on the end-of-course survey or other feedback from students or staff.

*Commitment to Iowa Students and Teach-Out:* As an addendum to the application, CSU-Global provided a letter signed by President Takeda-Tinker affirming the University's commitment to the delivery of programs in Iowa and agreeing to provide alternatives for students to complete their programs at the same or other institutions if CSU-Global closes the program before the students complete their program of study.

## **Additional Information**

### **Compliance with Iowa Code Chapter 714**

#### *Section 714.18 – Evidence of Financial Responsibility*

CSU – Global is exempt from filing evidence of financial responsibility because it is a public institution that was created as a degree-granting educational institution by Senate Bill 09-086, an Act of the General Assembly of the State of Colorado, in 2009 (revised Iowa Code Section 714.19, subsection 1).

#### *Section 714.23 – State Tuition Refund Policy*

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

## IOWA COLLEGE STUDENT AID COMMISSION

### Mount Carmel College of Nursing Application for Postsecondary Registration in Iowa November 2012

#### **RECOMMENDED ACTION:**

***Approve the voluntary application for postsecondary registration in Iowa for Mount Carmel College of Nursing with a waiver of the Iowa resident, full-time faculty member/program coordinator requirement of administrative rules.***

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 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 Section 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. 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, with the exception of proctored examinations. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations.

Mount Carmel College of Nursing must register in Iowa because Iowa-based affiliates of the College are conducting an operational activity on the school's behalf at Iowa locations, specifically promoting the College's distance education program. Mercy Medical Centers in Clinton, Dubuque, Dyersville, Mason City, New Hampton, and Sioux City are subsidiaries of Trinity Health, Mount Carmel College of Nursing's parent company. These Iowa hospitals are distributing information about the distance education program offered by Mount Carmel College of Nursing to their employees.

The College also requests authorization under its registration to, in the future, employ Iowa-based instructors in its online programs so that there is a local contact for questions, as a physical resource for students, and to build community.

#### **Institutional Information**

Mount Carmel College of Nursing is a non-profit school whose main campus is located at 127 South Davis Avenue, Columbus, OH. The College is a subsidiary of Trinity Health Unified Enterprise Ministry.

The chief executive officer of the school is Ann E. Schiele, Ph.D., RN. The College is not registered with the Iowa Secretary of State as an entity transacting business in Iowa. However, its parent company, Trinity Health Corporation, is registered with the Iowa Secretary of State as a foreign non-profit corporation #264627. Its Iowa registered agent is Russell M. Knight, 250 Mercy Dr., Dubuque, IA 52001.

*Accreditation:* The College is accredited by the Higher Learning Commission (HLC). Regarding its nursing-related distance education program, the Iowa Board of Nursing does not require the College to seek its approval. The College's RN to BSN program is approved by the Ohio Board of Nursing. The College's baccalaureate programs are accredited by an accrediting agencies recognized by the federal Department of Education that has distance education within its scope of accreditation, the Commission on Collegiate Nursing Education.

*Federal Stafford Loan Cohort Default Rate (FFY 2010):* 1.6%. For comparison purposes, the FFY 2010 national average cohort default rate is 9.1%.

*Graduation Rate:* 64.4%. 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:* \$18,850 for undergraduates; \$31,700 for graduate students.

*Record Preservation:* Transcripts for all students are stored electronically and officially accessed from the student electronic database by staff in the Records and Registration Office. Transcripts are retained permanently. A permanent academic record is electronically archived for each graduate of the program and includes storage of the final College academic transcript, degree awarded, and program completion date. The record also includes the application for admission and final official transcripts from other colleges/universities that would verify transfer of credit to the College, Veterans Administration paperwork (if applicable), and other College post-matriculation correspondence and documentation.

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

Mount Carmel College of Nursing Office of Records and Registration  
127 South Davis Avenue  
Columbus, OH 43222-1504  
(614) 234-3522  
<http://www.mccn.edu/current-students/transcript-request>

*Student Learning Resources:* Online students are introduced to the library during a mandatory orientation to online learning. Library services are available through the Mount Carmel Health Sciences Library website <http://library.mchs.com/> where students have access to tutorials, 117,769 e-books, and 26,104 e-journals. In addition, the College is a member of a consortium of 85 Ohio college and university libraries (OhioLink), which permits students access to 10 million electronic resources. Support services are available from the Center for Learning and Scholarship by phone, e-mail, web-conferencing, or through the Learning Management System. For technical assistance, students may access College Information Technology experts via e-mail, phone, web-conferencing, or through the Learning management System. There is also a College and Technology tab in the Learning Management System populated with FAQs and links to multiple tutorials.

*Curriculum Evaluation and Development:* All faculty developing and evaluating curriculum and teaching have discipline-appropriate degrees. This is verified upon hire and also independently by the Collegiate Commission on Nursing Education (CCNE) during reviews held every five years. Faculty comprising the College's Undergraduate Curriculum Committee possesses at least a master's degree; all but two have nursing-specific degrees and the two exceptions have degrees in the health sciences field. The Curriculum Committee meets twice monthly to evaluate and refine curriculum. Any substantive changes are brought to full faculty vote at one of the monthly Faculty Assembly meetings. Recent changes, benchmarked against the national *Essentials of Baccalaureate Education* from the American Association of Colleges of Nursing (AACN), include the addition of a cultural competence course and a nursing informatics course.

*Student Complaints Process:* Complaints must be made formally in writing, signed by the student, and addressed/submitted to a College Executive (President/Dean, Associate Dean of the Graduate Program, Associate Dean of the Undergraduate Program, Assistant Dean of Online Learning, director of Records and Registration, or Director of Business Affairs). These complaints are tracked and pursued. The College Executive who receives the formal written complaint will provide the institution's written response. The College records steps taken by the institution to resolve the complaint, the institution's final determination, and any referral to outside agencies or other external actions initiated by the student to resolve the complaint. The College's student complaint process is described in the Online RN-BSN Completion Program Student Handbook, p. 26.

### **Program Offered In Iowa**

Mount Carmel College of Nursing offers a single distance education program to Iowans, a baccalaureate, post-licensure degree completion program in nursing (RN to BSN). The total cost of the program for the 2012-2013 academic year \$15,976, at a rate of \$343.00 per credit hour. Additional fee charges that are included in the estimated program's costs are a one-time transcript evaluation/processing fee of \$100, a \$120.00 technology fee charged for each academic term, and a graduation fee of \$225.00 with a College pin and \$85.00 without a College pin.

The College may request to add on an additional distance education program, a Masters of Science in Nursing degree program, beginning in fall of 2013. Per Iowa Code Chapter 261B.5, the College must notify Commission staff within 90 days of the date it opens the program for enrollment. No additional registration application or addendum is necessary since the program would not require the approval of another Iowa state agency.

### **Registration Compliance**

As required by Iowa Code Section 261B.4, Mount Carmel disclosed its policy on refunding tuition charges for withdrawn students. The policy is disclosed in the school's Online RN to BSN Completion Program Student Handbook, p. 57. 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 annually in their Online RN-BSN Completion Program Student Handbook, beginning on page 32.
- 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. During the registration evaluation process, the College developed a policy for *all* students that meets the requirements of Iowa Code. The school will disclose the policy to students in its academic catalog.
- 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.

The Commission created a task force comprised of Iowa-based school representatives and Commission staff to study the statutory requirement and determine whether any state-wide consensus could be achieved on the definition of key terms that are defined in the new law, and guidelines for the new policy. The task force has completed its work and a copy of its recommendations was provided to Mount Carmel. However, staff believe that the Commission should 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, the 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 is disclosed to students in the College's Undergraduate Catalog and Catalog Supplement at [http://www.mccn.edu/pdf/academic\\_programs/2010\\_mccn\\_undergraduate\\_catalog.pdf](http://www.mccn.edu/pdf/academic_programs/2010_mccn_undergraduate_catalog.pdf) [http://www.mccn.edu/pdf/academic\\_programs/2012\\_undergraduate\\_catalog\\_supplement.pdf](http://www.mccn.edu/pdf/academic_programs/2012_undergraduate_catalog_supplement.pdf)

Mount Carmel College of Nursing 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:* Mount Carmel submitted an audit report dated September 22, 2010, conducted by the independent auditing firm Deloitte and Touche, LLP, which covers the Trinity Health Corporation and its subsidiaries for the fiscal years ending on June 30, 2010 and 2009. The auditing firm expressed its opinion that the Corporation’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 2010-2011 composite score. The school provided its most recently calculated composite score for its 2010-2011 fiscal year, which was 3.0.

*Full-Time Iowa Resident Faculty Member or Program Coordinator:* The 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 recommend 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.

*Instructional/Supervisory Staff Qualifications:* The College provided a credential summary for its entire faculty, including what each faculty member teaches, and identified 14 faculty who teach in the College’s online programs. Of the 14 online faculty members, 7 are full time. All possess at least a Master’s degree. Nine are Registered Nurses in the state of Ohio. Ten have specific degrees in nursing or another health science.

*Commitment to Iowa Students and Teach-Out:* Mount Carmel College of Nursing’s President Ann Schiele, PhD, RN, authored the cover letter accompanying the College’s registration application. In her cover letter Dr. Schiele states that the College is committed to advancing the educational preparation of nurses to the baccalaureate level and in an online format. In the unlikely event that the need for such a program would subside and the College would close the program, Dr. Schiele states the College would assist all students remaining in the program to find alternate institutions to complete their Baccalaureate degree in Nursing.

## **Additional Information**

### **Compliance with Iowa Code Chapter 714**

#### *Section 714.18 – Evidence of Financial Responsibility*

Staff approved Mount Carmel College of Nursing’s application for an exemption from the financial responsibility requirements of Iowa Code Section 714.18, based upon its status as a nursing school fully approved by the Ohio Board of Nursing. 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 Mount Carmel College of Nursing because it is a private nonprofit institution.

## IOWA COLLEGE STUDENT AID COMMISSION

### Bellevue University Renewal Application for Postsecondary Registration in Iowa November 2012

#### **RECOMMENDED ACTION:**

***Approve Bellevue University's Iowa registration renewal request.***

As a condition of registration:

- By the beginning of the fall 2013 term, the University 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).
- Within 90 days of the date that Bellevue University places an online program student in a field experience at an Iowa site, the University will notify the Commission of the field experience site location.

**Note: Per changes in Iowa Code Section 261B.3 effective July 1, 2012, Bellevue University's registration renewal period is 2 years.**

#### **Registration Purpose**

Revised Iowa Code Section 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. 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, with the exception of proctored examinations. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations.

Bellevue University has applied for registration renewal in order to continue offering residential programs at Iowa sites. The University has also applied for acknowledgement of its distance education programs.

#### **Institutional Information**

Bellevue University is a non-profit, private institution that maintains its main campus at 1000 Galvin Road South, Bellevue, Nebraska. The chief executive officer of the school is Dr. Mary B. Harkins, at the same address. The University is not registered with the Iowa Secretary of State as an entity conducting business in Iowa. Its Iowa contact person is Dr. Pamela Imperato, 508 N. 4<sup>th</sup> St., Missouri Valley, IA.

*Locations in Iowa:*

- Iowa Western Community College (IWCC)

2700 College Rd.  
Council Bluffs, Iowa

- Western Iowa Technical Community College (WIT)  
4647 Stone Ave.  
Sioux City, Iowa

Appropriate, current lease agreements were provided between the University and IWCC and WIT. The WIT lease agreement guarantees a private office on campus. Additional services may be mutually agreed upon between the two parties. Additional (classroom) space may be requested of WIT on a term-by-term basis, based on space available. WIT provides Bellevue University students with access to its computer lab and library and the University reports the ability to add on classrooms as needed. The lease agreement with IWCC guarantees office space, classroom space, computer lab space, and access to IWCC's learning resources.

The University no longer wishes to operate at its previously approved location in Red Oak, Iowa.

*Accreditation:* Bellevue University is regionally accredited by the Higher Learning Commission (HLC).

*Federal Stafford Loan Cohort Default Rate (FFY 2010):* 4.5%. For comparison purposes, the FFY 2010 national average cohort default rate is 9.1%.

*Graduation Rate:* 37%. The graduation rate is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion, as reported to the federal Department of Education. Bellevue University advises that it does not have cohort graduation rate data for each location, and that the graduate rate it calculates for reporting to the federal Department of Education represents .524% of the University's population.

*Average Loan Debt upon Graduation:* \$25,000 for undergraduate students; \$30,750 for graduate students. These data are for the University's main campus students.

*Record Preservation:* The University protects information and personal records in compliance with the regulations of the Family Educational Rights and Privacy Act of 1974. Academic records (created, received, or maintained) by University employees in the scope of employment, including any copies, belong to the University and are retained and disposed of according to the University's policy, which follows AACRAO Retention Guidelines.

*Transcript Requests:*

Pam Blouch  
1000 Galvin Road South,  
Bellevue, NB 68005-3098  
(402) 557-7404

*Student Learning Resources:* Bellevue University maintains a Center for Student Engagement (CSE) headed by a dean. The goal of the CSE is to provide programs and activities designed to support students and promote academic, personal, career achievement, and progress towards graduation. The CSE is comprised of eleven departments dedicated to support students with their academic and career endeavors. Peer tutoring is available to all students free of charge, including online students. Tutoring

is available in a variety of subject areas including accounting, business, computers, ESL, mathematics, MBA, science, Spanish, statistics, study skills, and more. The University's Writing Center offers business writing instruction by faculty online or through Bellevue's Cyber-Active Learning platform. Library resources are available 24/7 through the University's real-time user information network and an online tutorial is available in five modules to help students locate and use the services and resources that the library provides. Librarians are available via online chat 24/7 and in real time for help referencing material. The University supports 24/7 technical e-mail support, 12-hour per day voice assistance and administrative/advising support.

Bellevue University has a full-time admissions counselor located in Stuart Hall at Iowa Western Community College. In addition to Bellevue University's online library and academic resources, Iowa students also have access to the IWCC facilities, including the library and computer labs. A part-time Bellevue University admissions counselor is available in the Dr. Robert H. Kiser Building on the campus of Western Iowa Technical Community College (WIT). Iowa students attending the University's programs at WIT also have access to WIT facilities, including the library and computer labs.

*Curriculum Evaluation and Development:* Full-time faculty are highly involved in curriculum development in their area of discipline as well as evaluating curriculum through WEAVE, the University's electronic repository for planning and reporting on program objectives, measures, and artifacts decided upon to demonstrate that programs meet faculty, university, and accreditation standards. Full-time faculty are also required by their teaching contract to develop curriculum in their area of expertise. Full-time faculty serve on the Academic Review Committee (ARC) and the relatively new College Curriculum Committees. Comprised of one faculty member from each curricular college, the ARC's purpose is to aid in the development of high quality educational programs by providing an independent review of a syllabus's quality and course objectives in the case of new courses or changes that result in substantial modifications. In addition, the ARC provides input on new and changed programs to the Program Planning Committee through the Faculty Senate President. Only full-time faculty with disciplines for the University's majors offered in Iowa would develop curriculum for the Iowa sites.

*Student Complaints Process:* The University's Catalog <http://www.bellevue.edu/resources/content/pdfs/10-12-catalog.pdf> and Student Handbook <http://www.bellevue.edu/current-students/content/pdfs/handbooks/student-handbook.pdf> outline the University's Student Complaint Policy (for matters that do not relate to academic appeals, the Americans with Disabilities Act, plagiarism, the Student Conduct Code, Sexual Harassment Policy, or student records, for which other procedures apply). Each student is encouraged to attempt to resolve the issue directly with the appropriate faculty or staff member in an informal manner. If a satisfactory resolution cannot be reached informally, the student should submit the complaint to his/her Academic Advisor. The Academic Advisor is the student's liaison in the complaint process. Advisors assist by documenting the complaint and following up with the department or area under which it falls. If no satisfactory resolution is reached with the department, the student may submit his/her complaint in writing to the Assistant Vice President for Student Engagement/Dean of Students.

## **Programs Offered In Iowa**

Program costs listed below include tuition, fees, books, and supplies, or other standard programmatic charges.

*Residential Baccalaureate Degree Completion Programs* (based on admission with an associate degree or approximately 60 credit hours). Locations at which these programs are offered are indicated below: Iowa Western Community College (IWCC), or Western Iowa Technical Community College (WIT), as applicable.

- Bachelor of Science in Computer Information Systems - \$11,362.74 (IWCC)
- Bachelor of Science in Business - \$13,830 (WIT)
- Bachelor of Science in Business Analysis and Management - \$14,599.50 (WIT)
- Bachelor of Science in Criminal Justice - \$14,905 (WIT)
- Bachelor of Science in Healthcare Management - \$13,830 (WIT)
- Bachelor of Science in Human Resources - \$14,533 (WIT)
- Bachelor of Science in Management – \$13,830 (WIT)
- Bachelor of Science in Marketing Management - \$13,830 (WIT)
- Bachelor of Science in Security Management - \$14,460 (WIT)

*Residential Graduate Degree Programs*

- Master of Business Administration - \$21,425 (IWCC)
- Master of Science in Computer Information Systems \$20,054 (IWCC)
- Master of Healthcare Administration - \$20,870 (IWCC)
- Master of Science in Human Services - \$20,427 (IWCC)
- Master of Science in Management of Information Systems - \$20,002 (IWCC)

*Online Baccalaureate Degree Completion Programs* (based on admission with an associate degree or approximately 60 credit hours) – total estimated tuition/fee/book/supply cost of all programs listed below is \$17,150:

- Bachelor of Science in Adult Education
- Bachelor of Science in Behavioral Science
- Bachelor of Science in Business
- Bachelor of Science in Business Analysis and Management
- Bachelor of Science in Criminal Justice
- Bachelor of Science in Healthcare Management
- Bachelor of Science in Investigations
- Bachelor of Science in Legal Studies
- Bachelor of Science in Management
- Bachelor of Science in Management Information Systems
- Bachelor of Science in Management of Human Resources
- Bachelor of Science in Marketing Management
- Bachelor of Science in Non-Profit Management
- Bachelor of Science in Nursing (RN to BSN)
- Bachelor of Science in Project Management
- Bachelor of Science in Security Management
- Bachelor of Science in Software Development
- Bachelor of Science in Supply Chain and Logistics Management
- Bachelor of Science in Systems and Network Administration

### *Online 4-year Baccalaureate Degree Programs*

- Bachelor of Science in Accounting - \$48,190
- Bachelor of Arts in Art Management - \$48,190
- Bachelor Science in Business Administration - \$48,190
- Bachelor of Arts in Communication Arts - \$48,190
- Bachelor of Applied Science in Communication Arts - \$47,080
- Bachelor of Applied Science in Computer Information Systems - \$47,080
- Bachelor of Science in Cybersecurity - \$48,190
- Bachelor of Science in Game Studies - \$48,190
- Bachelor of Arts in Graphic Design - \$48,190
- Bachelor of Arts in Health Science - \$48,190
- Bachelor of Science in Information Technology - \$48,190
- Bachelor of Science in International Security and Intelligence Studies - \$48,190
- Bachelor of Applied Science in International Security and Intelligence Studies - \$48,190
- Bachelor of Arts in Liberal Studies - \$48,190
- Bachelor of Science in Psychology - \$48,190 (open for admission beginning Spring 2014)
- Bachelor of Arts in Psychology - \$48,190 (open for admission beginning Spring 2014)
- Bachelor of Science in Software Development - \$48,190
- Bachelor of Science in Systems and Network Administration Program - \$48,190
- Bachelor of Science in Web Technologies - \$48,190

### *Online Master's Degree Programs*

- Master of Arts in Human Services\* - \$18,060
- Master of Arts in Managerial Communication - \$18,060
- Master of Business Administration - \$19,515
- Master of Healthcare Administration - \$18,060
- Master of Project Management - \$18,060
- Master of Public Administration - \$18,060
- Master of Science in Acquisition and Contract - \$18,060
- Master of Science in Clinical Counseling\* – \$30,100. **NOTE:** Staff recommends that the University be permitted to offer this program under its Iowa registration for Iowa residents who wish to pursue careers as Iowa-licensed Mental Health Counselors. Iowa administrative rules require that a Mental Health Counseling licensure applicant either attend a program that is accredited by the Council on Accreditation of Counseling and Related Educational Programs (CACREP), or submit to a case-by-case educational credential equivalency evaluation. The University's program is not currently CACREP-accredited. However, the University's department chair has provided staff with internal program assessment documentation that substantiates the University's significant efforts to enhance the University's internship and coursework such that she believes the University's program now meets CACREP standards. The University just completed its internal approval process to initiate a CACREP accreditation application and is preparing to initiate the first step in that process, a self-evaluation study.
- Master of Science in Computer Information Systems - \$18,060
- Master of Science in Cybersecurity - \$18,060
- Master of Science in Finance - \$18,060
- Master of Science in International Security and Intelligence Studies - \$18,060
- Master of Science in Justice Administration and Crime Management - \$18,060

- Master of Science in Leadership and Coaching - \$18,060
- Master of Science in Management - \$18,060
- Master of Science in Management of Information Systems - \$18,060
- Master of Science in Security Management - \$18,060

*\*Internship:* These otherwise online programs require an internship that an Iowa resident may participate in at an Iowa location. The University provided an internship manual for these programs that discusses, in detail, policies for selection of internship sites, expectations of the internship site, the internship site supervisor, University faculty, and the student. The University executes a formal written agreement with the internship site and site supervisor. University faculty maintain regular phone and e-mail contact with site supervisors. While a student may request to perform his/her internship at an employment site, the employment site must meet University internship site standards and must provide the opportunity for the student to expand and enhance professional skills.

#### *Online Doctoral Degree Program –*

- Ph.D. in Human Capital Management - \$36,210

### **Registration Compliance**

As required by Iowa Code Section 261B.4, Bellevue University disclosed its policy on refunding tuition charges for withdrawn students. The policy is disclosed in the University's academic catalog at <http://www.bellevue.edu/resources/content/pdfs/12-13-catalog.pdf>

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 University maintains these policies and discloses them in their academic catalog and consumer information at:
  - ✓ <http://www.bellevue.edu/resources/content/pdfs/12-13-catalog.pdf>
  - ✓ <http://www.bellevue.edu/about/consumer-information/crime-statistics.aspx>
- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy concerning tuition and mandatory fee charges for members of the Iowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member has been called to active (Iowa) state or federal military duty or service. Bellevue University submitted for staff review a revised withdrawal policy that permits the options outlined in Iowa Code. Since the policy refers to the "student" in the case of a deployed service member, staff requested and obtained written assurances that the policy would be applied to the deployed

service member who is a student and to the spouse of a service member who is deployed when the spouse is the University's student. The University will disclose its military deployment policy to students on its website and in its next catalog revision.

- 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.

The Commission created a task force comprised of Iowa-based school representatives and Commission staff to study the statutory requirement and determine whether any state-wide consensus could be achieved on the definition of key terms that are defined in the new law, and guidelines for the new policy. The task force has completed its work and a copy of its recommendations was provided to Bellevue University. However, staff believe that the Commission should 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, Bellevue 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 and is disclosed to students in the University's catalog at <http://www.bellevue.edu/resources/content/pdfs/12-13-catalog.pdf> and on its program-specific web pages.

The University affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7. Effective July 1, 2012, these provisions of Iowa Code were modified to state that, provided the school does not claim "approval" or "accreditation," the school must disclose to students that it is registered by the Commission and provide Commission contact information for students who have questions or complaints about the school. The University will disclose this information on its website and will add the disclosure to its next catalog addition.

*Financial Responsibility:* Bellevue University submitted an independent financial audit report dated October 19, 2011, for the institutional fiscal years that ended June 30, 2010 and 2011, conducted by BKD, LLP. The auditing firm stated its opinion that the institution's consolidated financial statements present fairly, in all material respects, the financial position of the University.

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 University's 2010-2011 composite score. The most recent

composite score available from the federal Department of Education for Bellevue University is for institutional fiscal year that ended on June 30, 2010; the school's composite score was 3.0.

*Full-Time Iowa Resident Faculty Member or Program Coordinator:* Bellevue University has 44 full-time employees who reside in Iowa. The University included a complete list of Iowa-resident, full-time employees. Staff was able to verify through faculty profiles on the Bellevue University website that 5 of these 44 Iowa-resident employees are full-time faculty. As noted above, the University also maintains a full-time enrollment advisor, Amy Cox, on the IWCC campus in Council Bluffs, and a part-time enrollment advisor on the WIT campus in Sioux City.

*Instructional/Supervisory Staff Qualifications:* It appears that Bellevue University hires individuals to provide instruction in its programs who qualify for their assignments. Hiring policies for all University faculty are accessible on the University's web site at <http://www.bellevue.edu/faculty/employment/minimum-requirements.aspx> . All faculty positions require a minimum of a master's degree; however, terminal degrees are preferred in all University departments. Teaching experience or subject matter practical/work experience is required. The University provided resumes of all full-time and adjunct faculty as part of its registration application. Many of the University's full-time faculty have significant professional and/or teaching experience, professional affiliations, honors, and publications.

*Commitment to Iowa Students and Teach-Out:* The University's registration application includes a letter from President Mary Hawkins, Ph.D. Given that Bellevue University has been providing educational offerings in Iowa for many years, Dr. Hawkins reaffirms her commitment to delivery of degree programs in Council Bluffs and Sioux City. In the event that the University ceases to operate at either location, the University will ensure that students have the opportunity to complete their degree program by either teaching out any cohort programs that are currently in progress or offering classes online. Dr. Hawkins also states that the University agrees to provide alternatives for students to complete programs at other institutions should the program close prior to the students completing their courses of study.

## **Additional Information**

### **Compliance with Iowa Code Chapter 714**

#### *Section 714.18 – Evidence of Financial Responsibility*

Bellevue University provided satisfactory evidence of financial responsibility under Iowa Code Section 714.18, including documentation of a continuous, corporate surety bond payable to the State of Iowa in the amount of \$50,000, as issued by Merchants Bonding Company.

#### *Section 714.23 – State Tuition Refund Policy*

The Iowa tuition refund policy does not apply to Bellevue University because it is not a for-profit institution.

## IOWA COLLEGE STUDENT AID COMMISSION

### INSTE Bible College Application for Postsecondary Registration in Iowa November 2012

#### **RECOMMENDED ACTION:**

***Approve INSTE Bible College's Iowa registration request for a provisional period of one year, with a temporary waiver of the independent audit requirement until the conclusion of the institution's current fiscal year ending on June 30, 2013.***

As a condition of registration:

- By fall 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).
- The College must submit, on or before November 16, 2013, the report of its independent audit with an unqualified opinion for the institutional fiscal year that ends on June 30, 2013 and request that the Commission authorize an extension of its registration term to the full, two-year period. More information about the institution's financial status and the purpose of the waiver request appears under "Financial Responsibility" below.

#### **Registration Purpose**

Revised Iowa Code Section 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. 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, with the exception of proctored examinations. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations.

INSTE Bible College, a distance education postsecondary educational institution that provides programs in religious studies, originated in Iowa and was approved for an exemption from registration by another State entity before Iowa law assigned full responsibility to the Commission for enforcement of Iowa Code Chapter 261B in 2009. The exemption for which INSTE was previously approved is for "schools and education programs conducted by religious organizations solely for the religious instruction of leadership practitioners of that religious organization" [revised Iowa Code Section 261B.11, subsection 1, paragraph h]. Under that exemption, the College believed it was authorized to admit any prospective student without regard to the student's affiliation with the religious organization with which INSTE is affiliated. Due to the College's admission policy, Commission staff instructed the institution to apply for registration to demonstrate compliance with Iowa Code Chapter 261B.

#### **Institutional Information**

INSTE Bible College is a non-profit postsecondary educational institution that maintains its single administrative facility at 2302 SW 3<sup>rd</sup> St., Ankeny IA. The College is also known as *Seminario Biblico INSTE*, which is the Spanish translation of the College's name. INSTE is the educational unit of the Department of International Ministries of Open Bible Churches. The College serves the Latino community, provides its website in both Spanish and English at [INSTE@INSTE.edu](mailto:INSTE@INSTE.edu), and publishes an English and Spanish catalog. The chief executive officer of the school is Dr. Nicholas A. Venditti, at the same address. The College's Iowa contact person is its Executive Vice President, Dr. Leona Venditti, at the same address. INSTE Bible College is registered with the Iowa Secretary of State as a nonprofit corporation #293346 conducting business in the State. Its registered agent is Nicholas A. Venditti, at the same address as the College.

*Instructional Methodology:* INSTE Bible College's instructional methodology is 100% distance education. However, practically speaking and for certain students as described below, INSTE facilitates certain aspects of its program at on-ground, church locations. INSTE forms partnerships with local churches that have one or more leadership practitioners who are interested in volunteering as a Distance Leader. INSTE provides training to and certifies these church-based group leaders to act as weekly discussion facilitators for INSTE students. Once per week, no more than ten students in the certificate program and no more than seven in the diploma or degree programs meet in these small discussion groups with a group leader. Weekly meetings stress the practical application of knowledge acquired in daily study and help connect the student's information acquisition to their life and ministry experience.

Some INSTE students study completely online, using Moodle as a platform. These students have access to the same materials as students who participate in on-ground discussion groups. Online group meetings follow the same format, except that the meeting occurs via Skype video-conferencing once per week.

Students enroll in one 2-credit-hour (for the certificate or diploma program) or 3-credit-hour course (for the associate and bachelor degree programs) at a time and pay for one course at a time. Each course is a minimum of 7 weeks in length. Using the INSTE interactive book and a Bible, the student dedicates to study an average of 1 hour per day at the certificate level to 2.5 hours a day at the diploma and degree level. Course orientation, syllabi, and learning objectives are provided with the INSTE interactive book, which a student may obtain via paper format or online. No lectures are permitted. Lecture notes are contained in the INSTE interactive book.

Student achievement in INSTE programs is measured and documented through reviews at the end of each lesson keyed to learning objectives, lesson examinations, progress monitoring throughout a course and evaluations completed by group leaders at the culmination of each course; and final examinations at the conclusion of each course. In the Diploma, Associate, and Bachelor Degree programs, a program component entitled Beyond Academics helps students apply ministry training individually and culturally in a leader-in-training field experience under the guidance of a practicing church leader who evaluates the students against established competency expectations. A Capstone portfolio measures achievement against the competency goals of the program. For the Associate and Bachelor degree programs, there are also reflective term paper assignments at the end of each course that are part of final examination. INSTE faculty grade examinations and review group leader or mentor evaluations.

INSTE Bible College provided its 2012 re-accreditation self-evaluation and exhibits to assist staff in understanding the processes by which it determines learning objectives, incorporates academic rigor

that is comparable to a nationally and regionally accredited institutions of religious studies, and how it assesses student achievement.

*Accreditation:* INSTE Bible College is nationally accredited by the Distance Education and Training Council (DETC), an entity that is recognized by the federal Department of Education and that has distance education within its scope of accreditation. The College's DETC accreditation also recognizes the institution under its Spanish name, *Seminario Biblico INSTE*, and cross-references "INSTE Bible College."

*Federal Stafford Loan Cohort Default Rate (FFY 2010):* None. The College does not participate in the federal student aid programs.

*Graduation Rate:* The graduation rate is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion, as reported to the federal Department of Education. INSTE Bible College does not have a graduation rate as determined by and reported to the federal Department of Education because it is not a federal student aid participant.

INSTE Bible College uses methodology prescribed by its accrediting agency, DETC, to calculate its graduation rates. The institution reports that its graduation rate for a cohort of students that began the Diploma in Bible and Theology in 2006 was 58% by 2011.

The institution that reports that its graduation rate for a cohort of students that began its Bachelor of Arts in Bible and Theology program in 2004 was 79% by 2011.

There is no graduation rate for the Associate degree program since it is a new program offering.

*Average Loan Debt upon Graduation:* INSTE Bible College states that students generally graduate without loan obligation because of the school's low tuition costs. Students pay for one course at a time. On occasion, a partner church extends a payment plan or a partial scholarship to a student.

*Record Preservation:* INSTE follows the AACRAO retention of records guidelines. All records are retained in the student database system on a secure server and filed in record storage in a restricted-access part of the administrative offices. All records are also scanned and continually backed up electronically by a commercial company with redundant storage services for secure and permanent record preservation. INSTE also follows Family Education Rights and Privacy Act guidelines with respect to educational records.

*Transcript Requests:*

INSTE Bible College, Office of the Registrar  
2302 SW 3<sup>rd</sup> Street  
Des Moines, IA 50023  
(515) 289-9200

*Student Learning Resources:* INSTE provides interactive books that are used in conjunction with the Bible and serve as study guides in the courses. Bachelor degree program students may either purchase the Scholar's Library Logos Bible Software to conduct research needed for collateral reading and writing assignments, or the student may choose to independently access texts identified on the course syllabus through other sources. Students are also directed to other online resources, such as

Logos.Books.com, LogosBibleStudy.com, and ccel.com. Students who are working with in-person group leaders have access to personal libraries that are made available to the group. Students who are working with church leaders in the Beyond Academics component also have private resources available to them through their mentors.

*Curriculum Evaluation and Development:* Courses are authored by the College President and Academic Dean, Drs. Nicholas and Leona Venditti. Both Drs. Venditti have extensive experience in religious education. Dr. Leona Vendetta's educational specialization is in the area of curriculum design, instruction, and distance education. Content in the area of bible and theology does not change as dynamically as it would in other disciplines. Depending on the course in question, curriculum development is based on a synthesis of sources, both in classical and modern research. INSTE monitors curriculum offered by other nationally and regionally accredited institutions that offer programs in religious studies and uses resources in the areas of mission and theology that are available from the Fuller Theological Seminary. INSTE pays careful attention to the portability of ministry practice across cultural barriers. Comments and evaluations from national directors of INSTE groups in other countries and working in other languages, and partner church leaders are solicited periodically to check for cultural fit. Alumni surveys provide feedback about INSTE's training for ministry.

*Student Complaints Process:* INSTE discloses its process for addressing student complaints in its catalog and in the Student Handbook at [http://www.INSTE.edu/resources/catalog\\_other\\_resources](http://www.INSTE.edu/resources/catalog_other_resources).

## **Programs Offered In Iowa**

Total program costs below include tuition, books/supplies, and fees.

- Certificate in Christian Ministry 8 credit hours - \$346
- Diploma in Bible and Theology 68 credit hours - \$4,378
- Bachelor degree completion program (for students who have previously completed the diploma program) - \$1605 to \$2,325
- Associate of Arts in Bible and Theology 65 credit hours (open for enrollment beginning in spring 2013) - \$3,470\*
- Bachelor of Arts in Bible and Theology 128 hours - \$6,833\*

\* The associate and bachelor degree programs require transfer of general education coursework from an accredited institution: 36 hours for the Bachelor of Arts in Bible and Theology; 15 hours for the Associate of Arts in Bible and Theology.

Graduates of the Diploma and Bachelor in Bible and Theology programs may apply to Open Bible Churches for credentials as licensed ministers.

## **Registration Compliance**

As required by Iowa Code Section 261B.4, INSTE Bible College disclosed its policy on refunding tuition charges for withdrawn students. The policy is disclosed to students in the College's catalog at [http://www.INSTE.edu/resources/catalog\\_other\\_resources](http://www.INSTE.edu/resources/catalog_other_resources).

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. INSTE maintains these policies and discloses them in the academic catalog at:
  - ✓ [http://www.INSTE.edu/assets/documents/english/2012-13\\_Catalog\\_English\\_for\\_Web.pdf](http://www.INSTE.edu/assets/documents/english/2012-13_Catalog_English_for_Web.pdf)
- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy concerning tuition and mandatory fee charges for members of the Iowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member has been called to active (Iowa) state or federal military duty or service. INSTE Bible College has adopted a policy of refunding tuition and fees for all students who must withdraw because of military deployment (not only Iowa residents) and discloses this policy on its Enrollment Agreement, which was provided with the 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.

The Commission created a task force comprised of Iowa-based school representatives and Commission staff to study the statutory requirement and determine whether any state-wide consensus could be achieved on the definition of key terms that are defined in the new law, and guidelines for the new policy. The task force has completed its work and a copy of its recommendations was provided to INSTE. However, staff believe that the Commission should 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, INSTE Bible 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 provided to students in the College's catalog at [http://www.INSTE.edu/resources/catalog\\_other\\_resources](http://www.INSTE.edu/resources/catalog_other_resources).

INSTE Bible 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 in its catalog and on its website.

*Financial Responsibility:* INSTE Bible College submitted the report of an independent financial statement review dated August 4, 2011, conducted by Strawhacker & Associates, LLC, for the institutional fiscal years that ended June 30, 2011 and 2010. The accounting firm stated its opinion that the school's financial statements were in conformity with generally accepted accounting principles. This financial review provides less scrutiny than an independent audit, but meets the standards of its accrediting agency, DETC. Additionally, because of its low tuition costs, INSTE Bible College has no plans to seek federal student aid eligibility and therefore does not require an independent audit for that purpose. Staff discovered late during the registration application evaluation process that INSTE had submitted a financial review instead of an audit of its financial statements. Upon learning that administrative rules required an independent audit, the institution stated that the increased cost of an immediate audit would place a financial burden on the institution. Therefore, staff request that the institution be registered provisionally based on its financial statement review and with a waiver of the financial audit requirement until the end of its current fiscal year. The institution commits to facilitating an independent audit of its financial statements for the fiscal year ending June 30, 2013, and each year thereafter while it is registered in Iowa.

*Facilities:* INSTE Bible College does not provide in-person instruction at its administrative facility. The College leases its administrative facility in Ankeny, and provided a photograph of that building, which it shares with 3 other businesses.

*Full-Time Iowa Resident Faculty Member or Program Coordinator:* INSTE Bible College has 8 full-time, Iowa-resident employees, of which 5 are full-time faculty and/or administrators:

- Dr. Nicholas Venditti
- Dr. Leona Venditti
- Caleb Pahyl
- Claudia Phal
- Cindy Senephansiri
- Victor Colon
- Ricky Poon
- Stephany Reeves

*Instructional/Supervisory Staff Qualifications:* INSTE Bible College disclosed the resumes of all faculty. All but one hold at least a master's degree in theology or divinity. The single faculty member with a baccalaureate degree is currently enrolled in a master's degree program and is responsible for student assessment only in the undergraduate certificate or diploma programs. One of the faculty members who also serves as the Academic Dean and who is responsible for curriculum development has a graduate degree and post-graduate certificate in curriculum and instruction from Drake University, as well as a doctoral degree from Drake University in educational administration. The President and Academic Dean of the College are the co-authors of a number of published, Biblical texts in Spanish.

*Commitment to Iowa Students and Teach-Out:* INSTE Bible College submitted a letter from its President, Dr. Nicholas Venditti, affirming the College's commitment to the delivery of programs in Iowa and agreeing to provide alternatives for students to complete their programs at other institutions if INSTE closes the program before the students complete their program of study. If this become

necessary, the College has signed a teach-out agreement with its accrediting agency, DTEC, which will guide the process of fulfilling this commitment.

## **Additional Information**

### **Compliance with Iowa Code Chapter 714**

#### *Section 714.18 – Evidence of Financial Responsibility*

INSTE Bible College demonstrates satisfactory evidence of financial responsibility, including a continuous corporate surety bond made payable to the State of Iowa in the amount of \$50,000, issued by CNA.

#### *Section 714.23 – State Tuition Refund Policy*

The Iowa tuition refund policy does not apply to INSTE Bible College because it is not a for-profit institution.

## IOWA COLLEGE STUDENT AID COMMISSION

### Kaplan University Application for Voluntary Postsecondary Registration in Iowa November 2012

#### **RECOMMENDED ACTION:**

***Approve Kaplan University's voluntary application for postsecondary registration in Iowa.***

- Pursuant to Iowa Code Section 261B.5, notify Commission staff within 90 days of the Iowa location(s) at which an online degree candidate will fulfill a clinical, internship, externship or practicum requirement at an Iowa location.

**Note: Per changes in Iowa Code Section 261B.3 effective July 1, 2012, Kaplan University's registration period is 2 years.**

#### **Registration Purpose**

Kaplan University is currently eligible for an exemption from registration in Iowa under revised Iowa Code Section 261B.11, subsection 10 (i.e., the University meets the institutional eligibility requirements of participation in the Iowa Tuition Grant program). The University voluntarily requests registration in Iowa in order to comply with federal regulations in 34 CFR 600.9, which requires 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.

Note: Kaplan University shares an ultimate corporate parent, Kaplan, Inc., with other institutions of higher learning such as Kaplan College. From a corporate management perspective, Kaplan Higher Education Group, headed by Chief Executive Officer Greg Marino, who is an internal Kaplan University trustee, provides fiscal and corporate support directly to Kaplan University. This ensures that Kaplan University's support mechanisms are focused entirely on Kaplan University's mission and students. Kaplan, Inc.'s other, non-HLC accredited institutions, including Kaplan College, operate under various other legal entities and a reporting structure known as the Kaplan Higher Education Campuses (KHEC). KHEC has an executive management and reporting structure for all of its constituent institutions that is entirely separate from Kaplan University. Kaplan University has no control or oversight responsibility over KHEC entities, and KHEC has no control or oversight over any part of Kaplan University.

*Registration authorization is therefore requested and recommended only for the Iowa-based campuses and service centers of Kaplan University, and the distance education programs offered by Kaplan University, including certain programs offered by the Concord Law Center.*

#### **Background**

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

- 1801 East Kimberly Rd., Suite 1, Davenport Iowa (main campus)

- 7009 Nordic Dr., Cedar Falls Iowa
- 3165 Edgewood Parkway SW, Cedar Rapids, Iowa
- 1751 Madison Ave., Council Bluffs, Iowa
- 4554 121<sup>st</sup> St., Urbandale, Iowa
- 2570 4<sup>th</sup> St. SW, Plaza West, Mason City, Iowa

The University also maintains campuses and/or student service centers and administrative offices in the states of California, Arizona, Florida, Illinois, Indiana, Maine, Maryland, Missouri, Nebraska, and Wisconsin. The chief executive officer of Kaplan University is President Wade Dyke, 550 West Van Buren St., 7<sup>th</sup> floor, Chicago, IL. Kaplan University maintains a fictitious name registration with the Iowa Secretary of State's office under a foreign (Delaware), for-profit corporation registration #222144 for Iowa College Acquisition Corporation. Its registered agent is CT Corporation System, 500 East Court Avenue, Des Moines, IA. The University's Iowa contact person is Susan Spivey, Cedar Rapids Campus President, 3165 Edgewood Pkwy SW, Cedar Rapids, IA.

*Accreditation:* Kaplan University is regionally accredited by the Higher Learning Commission (HLC). Kaplan University is also programmatically approved by:

- The Iowa Board of Nursing to offer a diploma (LPN licensure), associate (RN licensure), baccalaureate and master's degree programs (non-licensure) in nursing science.
- The Iowa Board of Education to offer a Master of Arts in Teaching program that prepares students for licensed employment in Iowa as a teacher.

*Instructional Methodology:* Kaplan University offers Iowa students educational programs via classroom instruction and distance education. Not all Kaplan University programs are available through each Iowa campus (see *Programs Offered in Iowa* below) via in-person instruction. Kaplan University is in the process of updating its Iowa campus-based websites to enhance a prospective student's understanding of which programs are offered with a classroom-based, face-to-face component and which programs are offered with only online delivery. Kaplan assures staff that a student enrolled in a program that offers courses with a classroom-based, face-to-face component has the opportunity to take those courses in that delivery mode. Through the campus advising process, students are made aware of the delivery option for courses in their program and building their schedule to meeting graduation requirements in the recommended time frame for completion.

Students enrolled in Kaplan University, regardless of delivery mode, use the University's online virtual platform, which is located on the internet at [www.kucampus.kaplan.edu](http://www.kucampus.kaplan.edu). It is supported by a large farm of Web servers configured redundantly to generally assure uninterrupted, around-the-clock operation. Kaplan University's students have access to the Kaplan University Advanced Classroom Environment, a unique, high-performance, multi-user data management system. All Kaplan University courses include a synchronous and asynchronous component. The synchronous component in online courses is a one-hour, faculty-led seminar. In blended courses, the synchronous component is face-to-face in a classroom with an instructor. The asynchronous components in all courses include threaded discussion, and interactive activities such as text-based discussion, quizzes, and readings. Threaded discussion forums are prompted by faculty using the virtual classroom Discussion Board. The online classroom provides an integrated e-mail system that can be used for student-to-student messages or faculty-to-student correspondence. Virtual office hours allow students to communicate directly with instructors. The classroom also provides

an assignment function that allows students to identify all required course assignments and any updated postings when the student logs into class.

*Federal Stafford Loan Cohort Default Rate (FFY 2010):* 16.8% (institution-wide). For comparison purposes, the FFY 2010 national average cohort default rate is 9.1%.

*Graduation Rate:* The graduation rate is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion, as reported to the federal Department of Education. Kaplan University provided the following graduation rates for students enrolled at the Kaplan University campuses and online students based on the 2004 first-time, full-time undergraduate cohort:

- Davenport campus: 27%
- Cedar Falls campus: 25%
- Cedar Rapids campus: 34%
- Council Bluffs campus: 40%
- Urbandale (Des Moines) campus: 31%
- Mason City campus: 45%

*Average Loan Debt upon Graduation:* The University provided median loan debt rates for students who completed a program between July 1, 2009, and July 30, 2010:

- Davenport campus
  - Associate of Applied Science in Information Technology - \$19,853
  - Associate of Applied Science in Paralegal Studies - \$18,742
  - Associate of Applied Science in Criminal Justice - \$19,800
  - Associate of Applied Science in Medical Assisting - \$19,809
  - Associate of Applied Science in Business Administration - \$16,520
  - Bachelor of Science in Business Administration - \$28,017
  - Bachelor of Science in Criminal Justice - \$30,406
- Cedar Falls campus
  - Associate of Applied Science in Information Technology - \$18,923
  - Associate of Applied Science in Criminal Justice - \$17,367
  - Associate of Applied Science in Medical Assisting - \$17,778
  - Associate of Applied Science in Business Administration - \$16,130
  - Practical Nursing Diploma - \$14,149
  - Bachelor of Science in Business Administration - \$23,398
  - Advanced Start Bachelor of Science in Business Administration - \$14,311
- Cedar Rapids campus
  - Associate of Applied Science in Information Technology - \$15,246
  - Associate of Applied Science in Criminal Justice - \$14,807
  - Associate of Applied Science in Medical Assisting - \$21,913
  - Associate of Applied Science in Business Administration - \$18,275
  - Associate of Applied Science in Accounting - \$13,234
  - Practical Nursing Diploma - \$14,329
  - Bachelor of Science in Business Administration - \$28,518

- Council Bluffs campus
  - Associate of Applied Science in Criminal Justice - \$19,430
  - Associate of Applied Science in Medical Assisting - \$20,619
  - Associate of Applied Science in Business Administration - \$20,720
  - Bachelor of Science in Business Administration \$26,055
  
- Urbandale (Des Moines) campus
  - Associate of Applied Science in Information Technology - \$18,178
  - Associate of Applied Science in Paralegal Studies - \$13,878
  - Associate of Applied Science in Criminal Justice - \$18,188
  - Associate of Applied Science in Medical Assisting - \$19,574
  - Practical Nursing Diploma - \$12,689
  - Associate of Applied Science in Business Administration \$17,806
  - Associate of Applied Science in Accounting - \$11,528
  - Bachelor of Science in Business Administration - \$19,802
  
- Mason City campus
  - Associate of Applied Science in Information Technology - \$19,040
  - Associate of Applied Science in Criminal Justice - \$19,800
  - Associate of Applied Science in Medical Assisting - \$21,151
  - Associate of Applied Science in Business Administration - \$20,050
  - Bachelor of Science in Business Administration - \$26,960

*Record Preservation:* The University stores all relevant student documents in the student's electronic profile using the Orion Document Imaging system and retains the records in that format. The Document Imaging file is organized into two major areas, the student's Academic File and the student's Financial File. Different departments are responsible for the effective delivery of these documents into the student's electronic file.

*Transcript Requests:*

- Online: Mike Lorenz, Registrar, 550 W. Van Buren, 7<sup>th</sup> FL, Chicago, IL 60607 (866) 522-7747
- Davenport: Janet Behris, Registrar, 1801 East Kimberly Rd., Suite 1, Davenport IA 52807 (563) 355-3500
- Cedar Falls: Katie Matt, Registrar, 7009 Nordic Dr., Cedar Falls, IA 50613 (319) 277-0220
- Cedar Rapids: Marty Coffey/Theresa Mackey, Registrar, 3165 Edgewood Parkway SW, Cedar Rapids IA 52404 (319) 363-0481
- Council Bluffs: Jennifer Wilson, Registrar, 1751 Madison Ave. Suite 750, Council Bluffs, IA 51503 (712) 328-4212
- Urbandale (Des Moines): Curt Bolte, Registrar, 4655 121<sup>st</sup> St., Urbandale, IA 50323 (515) 727-2100
- Mason City: Pattie Eden, Registrar, Plaza West, 2570 4<sup>th</sup> St. SW, Mason City, IA 50401 (641) 423-2530

*Student Learning Resources:* Kaplan University provides an on-site library and in-person library research assistance during posted hours of operation at each of its Iowa campuses. Each library also offers computer stations, wireless connectivity, downloadable audio and electronic books, and

interlibrary loan services. Davenport's campus library offers the only on-campus law library in the Quad Cities area. In addition, all Kaplan students have access to the Kaplan Online Library, which facilitates access to over 50,000 e-books, the Kaplan University library catalog, and articles from professional, scholarly and trade journals. Services for online students include book delivery and interlibrary loan services. Reference assistance for online students is available via e-mail and toll-free phone or real-time chat during posted hours or by appointment. Online academic support services include a writing assistance center, and math and science tutorial services for independent use or in real time during posted hours. Students who need extra help because of academic difficulties may inquire about available tutoring services by contacting their Academic Advisor online or by contacting the Academic Success Center or Academic Dean at each Iowa campus.

*Curriculum Evaluation and Development:* Curriculum approval at the University is a two-step process. The first step is an asynchronous process that is conducted by a school-specific review team made up of faculty, staff, and students from the individual schools within Kaplan. The second step is a synchronous meeting of the Faculty Curriculum Committee.

The Kaplan University School Review Teams (SRTs) are responsible for the review of decisions regarding curriculum programs and courses in their respective schools. The SRTs approve new programs and/or changes to existing programs, and approve new courses and/or changes to existing courses. Approved proposals are sent to the Faculty Curriculum Committee for final approval. Requested additions and/or changes are generally approved if the request is submitted with the endorsement of the faculty within the program in which it is offered and if the following conditions are met: the request is harmonious with and/or supports the University's Mission Statement; the request clearly fulfills a need that cannot be met by existing courses or programs; the request meets general University requirements; the request is appropriate to the function of the University; and the request does not duplicate a course or program already offered by the University.

*Student Complaints Process:* The University's Catalog

[www.kaplanuniversity.edu/documents/catalog.pdf](http://www.kaplanuniversity.edu/documents/catalog.pdf)

outlines the University's student complaint and grievance policy for discrimination and other matters that do not relate to academic appeals. Each student is encouraged to attempt to resolve the issue directly with the appropriate faculty or staff member in an informal manner. If a satisfactory resolution cannot be reached through this initial step, the Kaplan student issue resolution/grievance process outlines step-by-step instructions for on campus and online students to seek relief. Kaplan University also provides students with a complete list of state agencies to which they may direct questions, concerns, or complaints.

## **Programs Offered in Iowa**

### *Online Programs*

- Associate of Applied Science in Accounting - \$34,235 - \$34,317
- Associate of Applied Science in Business Administration - \$34,235 - \$34,317
- Associate of Applied Science in Criminal Justice - \$34,235 - \$34,317
- Associate of Applied Science in Early Childhood Development - \$34,235 - \$34,317
- Associate of Applied Science in Educational Paraprofessional - \$34,235 - \$34,317
- Associate of Applied Science in Fire Science - \$34,235 - \$34,317
- Associate of Applied Science in Health Information Technology - \$35, 277 - \$35,359

- Associate of Applied Science in Human Services - \$34,235 - \$34,317
- Associate of Applied Science in Information Technology - \$34,235 - \$34,317
- Associate of Applied Science in Medical Assisting - \$35,877 - \$35,959
- Associate of Applied Science in Medical Office Management - \$35,906 - \$34,988
- Associate of Applied Science in Medical Transcription - \$34,325 - \$34,317
- Associate of Applied Science in Paralegal Studies - \$34,325 - \$34,317
- Associate of Applied Science in Public Administration - \$34,325 - \$34,317
- Advanced Start Bachelor of Science Option (Associate degree required) - \$34,235 - \$34,617
- Bachelor of Science in Accounting - \$68,325 - \$68,707
- Bachelor of Science in Business Administration – \$68,325 - \$68,707
- Bachelor of Science in Communication – \$68,325 - \$68,707
- Bachelor of Science in Criminal Justice - \$68,325 - \$68,707
- Bachelor of Science in Criminal Justice Administration and Management - \$68,325 - \$68,707
- Bachelor of Science in Early Childhood Development (non-licensure) - \$68,325 - \$68,707
- Bachelor of Science in Environmental Policy and Management - \$68,325 - \$68,707
- Bachelor of Science in Fire and Emergency Management - \$68,325 - \$68,707
- Bachelor of Science in Fire and Emergency Management - \$68,325 - \$68,707
- Bachelor of Science in Fire Science - \$68,325 - \$68,707
- Bachelor of Science in Health and Wellness - \$68,325 - \$68,707
- Bachelor of Science in Health Care Administration - \$68,325 - \$68,707
- Bachelor of Science in Health Information Management - \$34,235
- Bachelor of Science in Health Science - \$68,325 - \$68,707
- Bachelor of Science in Human Services - \$68,325 - \$68,707
- Bachelor of Science in Information Technology - \$68,325 - \$68,707
- Bachelor of Science in International and Comparative Criminal Justice - \$68,325 - \$68,707
- Bachelor of Science in Legal Studies - \$68,325 - \$68,707
- Bachelor of Science in Liberal Studies - \$68,325 - \$68,707
- Bachelor of Science in Nursing (non-licensure) - \$29,277
- Bachelor of Science in Nutrition Science (non-licensure) - \$68,325 - \$68,707
- Bachelor of Science in Political Science - \$68,325 - \$68,707
- Bachelor of Science in Professional Studies - \$68,325 - \$68,707
- Bachelor of Science in Psychology - \$68,325 - \$68,707
- Bachelor of Science in Public Administration and Policy - \$68,325 - \$68,707
- Master of Arts in Teaching (approved for Iowa teaching licensure) - \$15,945 - \$21,825
- Master of Business Administration - \$27,379.50 with no specialization; \$34,635.50 with specialization
- Master of Health Care Administration - \$22,667
- Master of Public Administration - \$20,885
- Master of Public Health - \$23,945
- Master of Science in Accounting - \$23,627
- Master of Science in Criminal Justice - \$21,920
- Master of Science in Education (non-licensure) - \$18,455 - \$21,535

- Master of Science in Education in Instructional Technology (non-licensure) - \$19,895 - \$20,330
- Master of Science in Educational Psychology (non-licensure) - \$20,665
- Master of Science in Environmental Policy - \$20,885
- Master of Science in Finance - \$23,277
- Master of Science in Health Education - \$23,277
- Master of Science in Higher Education - \$19,945 - \$28,280
- Master of Science in Homeland Security and Emergency Management - \$21,820
- Master of Science in Information Technology - \$21,820
- Master of Science in Legal Studies - \$20,885
- Master of Science in Management - \$25,505
- Master of Science in Nursing (non-licensure) - \$25,505
- Master of Science in Psychology (non-licensure) - \$22,725 - \$24,665
- Adult Gerontology Practitioner Certificate - \$21,867
- Applied Behavioral Analysis Postbaccalaureate Certificate - \$11,475
- Cisco Networks Postbaccalaureate Certificate - \$10,362
- Computer Forensics Postbaccalaureate Certificate - \$10,733
- Corrections Certificate - \$13,701
- Crime Scene Technician Certificate - \$16,769
- Family Nurse Practitioner Certificate - \$25,647
- Graduate Certificate in Accounting - \$7,301
- Graduate Certificate in Addictions - \$11,895
- Graduate Certificate in Entrepreneurship for Growth Ventures - \$1,095
- Graduate Certificate in Entrepreneurship for New Ventures - \$1,095
- Graduate Certificate in Human Resources - \$7,301
- Graduate Certificate in Information Security - \$7,301
- Graduate Certificate in Instructional Design for Organizations - \$8,330
- Graduate Certificate in K-12 Educational Leadership (non-licensure) - \$6,790
- Graduate Certificate in Literacy and Language Teaching – Grades 6-12 (non-licensure) - \$6,790
- Graduate Certificate in Literacy and Language Teaching – Grades K-6 (non-licensure) - \$6,790
- Graduate Certificate in Mathematics Teaching Elementary Grades (non-licensure) - \$6,790
- Graduate Certificate in Mathematics Teaching Secondary Grades (non-licensure) - \$6,790
- Graduate Certificate in Online College Teaching (non-licensure) - \$7,945
- Graduate Certificate in Project Management - \$7,301
- Graduate Certificate in Teaching with Technology (non-licensure) - \$6,790
- Human Resources Postbaccalaureate Certificate - \$11,745
- Information Security Postbaccalaureate Certificate - \$8,036
- Internet and Web Design Postbaccalaureate Certificate - \$9,991
- Legal Secretary Certificate - \$11,846
- Linux System Administration Postbaccalaureate Certificate - \$8,036
- Management and Supervision Certificate in Criminal Justice - \$13,701
- Microsoft Operating Systems Postbaccalaureate Certificate - \$9,991
- National Security Administration Postbaccalaureate Certificate - \$6,923

- Nursing Administrator Graduate Certificate - \$11,385
- Nurse Educator Graduate Certificate - \$11,385
- Nursing Informatics Graduate Certificate - \$11,385
- Oracle Database Administration Postbaccalaureate Certificate - \$8,778
- Pathway to Paralegal Certificate - \$13,701 - \$14,072
- Postgraduate Certificate in Applied Behavioral Analysis - \$11,475
- Private Security Certificate - \$20,208

*Concord Law School Online Programs* – see <http://info.concordlawschool.edu/Pages/Tuition.aspx> for information about tuition and fees

- Executive Juris Doctor (non-licensure)
- Master of Laws (non-licensure)

Kaplan University withdrew its request to offer Iowa residents the Concord Law School's online Juris Doctor program. At this time, this program qualifies graduates for licensure as an attorney only in the state of California.

*Iowa Campus Program Enrollment Options:* Students in Iowa have the opportunity to enroll in a slate of programs through campus locations. Select undergraduate programs are available in a hybrid delivery mode which includes both face-to-face and online instruction. Programs at the graduate level are 100% online. Prospective students should consult the web-based program details provided for each Iowa campus, or contact the Iowa campus directly, to confirm instructional methodology. Costs of the programs offered through the Iowa campuses are the same as indicated above. Available data on total costs of programs offered solely through the Iowa campuses are indicated below.

### *Davenport*

- Associate of Applied Science in Accounting
- Associate of Applied Science in Business Administration
- Associate of Applied Science in Criminal Justice
- Associate of Applied Science in Fire Science
- Associate of Applied Science in Human Services
- Associate of Applied Science in Information Technology
- Associate of Applied Science in Medical Assisting
- Associate of Applied Science in Medical Office Management
- Associate of Applied Science in Paralegal Studies
- Associate of Applied Science in Public Administration
- Bachelor of Science in Accounting
- Bachelor of Science in Business Administration
- Bachelor of Science in Communication
- Bachelor of Science in Criminal Justice
- Bachelor of Science in Criminal Justice Administration and Management
- Bachelor of Science in Environmental Policy and Management
- Bachelor of Science in Fire and Emergency Management
- Bachelor of Science in Fire Science
- Bachelor of Science in Health and Wellness
- Bachelor of Science in Health Care Administration

- Bachelor of Science in Health Science
- Bachelor of Science in Human Services
- Bachelor of Science in Information Technology
- Bachelor of Science in International and Comparative Criminal Justice
- Bachelor of Science in Legal Studies
- Bachelor of Science in Liberal Studies
- Bachelor of Science in Nutrition Science (non-licensure)
- Bachelor of Science in Paralegal Studies
- Bachelor of Science in Political Science
- Bachelor of Science in Professional Studies
- Bachelor of Science in Psychology
- Bachelor of Science in Public Administration and Policy
- Master of Business Administration
- Master of Public Administration
- Master of Public Health
- Master of Science in Criminal Justice
- Master of Science in Environmental Policy
- Master of Science in Homeland Security and Emergency Management
- Master of Science in Information Technology
- Master of Science in Management
- Master of Science in Psychology (non-licensure)
- Pathway to Paralegal Postbaccalaurate Certificate

### *Cedar Falls*

- Associate of Applied Science in Accounting
- Associate of Applied Science in Business Administration
- Associate of Applied Science in Criminal Justice
- Associate of Applied Science in Fire Science
- Associate of Applied Science in Human Services
- Associate of Applied Science in Information Technology
- Associate of Applied Science in Medical Assisting
- Associate of Applied Science in Medical Office Management
- Associate of Applied Science in Paralegal Studies
- Associate of Applied Science in Public Administration
- Associate of Science in Nursing (licensure) - \$39,715 - \$44,267
- Bachelor of Science in Accounting
- Bachelor of Science in Business Administration
- Bachelor of Science in Communication
- Bachelor of Science in Criminal Justice
- Bachelor of Science in Criminal Justice Administration and Management
- Bachelor of Science in Environmental Policy and Management
- Bachelor of Science in Fire and Emergency Management
- Bachelor of Science in Fire Science
- Bachelor of Science in Health and Wellness
- Bachelor of Science in Health Care Administration
- Bachelor of Science in Health Science

- Bachelor of Science in Human Services
- Bachelor of Science in Information Technology
- Bachelor of Science in International and Comparative Criminal Justice
- Bachelor of Science in Legal Studies
- Bachelor of Science in Liberal Studies
- Bachelor of Science in Nutrition Science (non-licensure)
- Bachelor of Science in Paralegal Studies
- Bachelor of Science in Political Science
- Bachelor of Science in Professional Studies
- Bachelor of Science in Psychology
- Bachelor of Science in Public Administration and Policy
- Master of Business Administration
- Master of Public Administration
- Master of Public Health
- Master of Science in Criminal Justice
- Master of Science in Environmental Policy
- Master of Science in Homeland Security and Emergency Management
- Master of Science in Information Technology
- Master of Science in Management
- Master of Science in Psychology (non-licensure)
- Practical Nursing Diploma (offered entirely onsite) – \$23,410

#### Cedar Rapids

- Associate of Applied Science in Accounting
- Associate of Applied Science in Business Administration
- Associate of Applied Science in Criminal Justice
- Associate of Applied Science in Fire Science
- Associate of Applied Science in Human Services
- Associate of Applied Science in Information Technology
- Associate of Applied Science in Medical Assisting
- Associate of Applied Science in Medical Office Management
- Associate of Applied Science in Public Administration
- Associate of Science in Nursing (licensure)
- Bachelor of Science in Accounting
- Bachelor of Science in Business Administration
- Bachelor of Science in Communication
- Bachelor of Science in Criminal Justice
- Bachelor of Science in Criminal Justice Administration and Management
- Bachelor of Science in Environmental Policy and Management
- Bachelor of Science in Fire and Emergency Management
- Bachelor of Science in Fire Science
- Bachelor of Science in Health and Wellness
- Bachelor of Science in Health Care Administration
- Bachelor of Science in Health Science
- Bachelor of Science in Human Services
- Bachelor of Science in Information Technology

- Bachelor of Science in International and Comparative Criminal Justice
- Bachelor of Science in Liberal Studies
- Bachelor of Science in Nutrition Science (non-licensure)
- Bachelor of Science in Political Science
- Bachelor of Science in Professional Studies
- Bachelor of Science in Psychology
- Bachelor of Science in Public Administration and Policy
- Master of Business Administration
- Master of Public Administration
- Master of Public Health
- Master of Science in Criminal Justice
- Master of Science in Environmental Policy
- Master of Science in Homeland Security and Emergency Management
- Master of Science in Information Technology
- Master of Science in Management
- Master of Science in Psychology (non-licensure)
- Practical Nursing Diploma (offered entire onsite)

### *Council Bluffs*

- Associate of Applied Science in Accounting
- Associate of Applied Science in Business Administration
- Associate of Applied Science in Criminal Justice
- Associate of Applied Science in Fire Science
- Associate of Applied Science in Human Services
- Associate of Applied Science in Information Technology
- Associate of Applied Science in Medical Assisting
- Associate of Applied Science in Medical Office Management
- Associate of Applied Science in Public Administration
- Bachelor of Science in Accounting
- Bachelor of Science in Business Administration
- Bachelor of Science in Communication
- Bachelor of Science in Criminal Justice
- Bachelor of Science in Criminal Justice Administration and Management
- Bachelor of Science in Environmental Policy and Management
- Bachelor of Science in Fire and Emergency Management
- Bachelor of Science in Fire Science
- Bachelor of Science in Health and Wellness
- Bachelor of Science in Health Care Administration
- Bachelor of Science in Health Science
- Bachelor of Science in Human Services
- Bachelor of Science in Information Technology
- Bachelor of Science in International and Comparative Criminal Justice
- Bachelor of Science in Liberal Studies
- Bachelor of Science in Nutrition Science (non-licensure)
- Bachelor of Science in Political Science
- Bachelor of Science in Professional Studies

- Bachelor of Science in Psychology
- Bachelor of Science in Public Administration and Policy
- Master of Business Administration
- Master of Public Administration
- Master of Public Health
- Master of Science in Criminal Justice
- Master of Science in Environmental Policy
- Master of Science in Homeland Security and Emergency Management
- Master of Science in Information Technology
- Master of Science in Management
- Master of Science in Psychology (non-licensure)

*Urbandale (Des Moines)*

- Associate of Applied Science in Accounting
- Associate of Applied Science in Business Administration
- Associate of Applied Science in Criminal Justice
- Associate of Applied Science in Fire Science
- Associate of Applied Science in Human Services
- Associate of Applied Science in Information Technology
- Associate of Applied Science in Medical Assisting
- Associate of Applied Science in Medical Office Management
- Associate of Applied Science in Paralegal Studies
- Associate of Applied Science in Public Administration
- Associate of Science in Nursing (licensure)
- Bachelor of Science in Accounting
- Bachelor of Science in Business Administration
- Bachelor of Science in Communication
- Bachelor of Science in Criminal Justice
- Bachelor of Science in Criminal Justice Administration and Management
- Bachelor of Science in Environmental Policy and Management
- Bachelor of Science in Fire and Emergency Management
- Bachelor of Science in Fire Science
- Bachelor of Science in Health and Wellness
- Bachelor of Science in Health Care Administration
- Bachelor of Science in Health Science
- Bachelor of Science in Human Services
- Bachelor of Science in Information Technology
- Bachelor of Science in International and Comparative Criminal Justice
- Bachelor of Science in Legal Studies
- Bachelor of Science in Liberal Studies
- Bachelor of Science in Nutrition Science (non-licensure)
- Bachelor of Science in Political Science
- Bachelor of Science in Professional Studies
- Bachelor of Science in Psychology
- Bachelor of Science in Public Administration and Policy
- Master of Business Administration

- Master of Public Administration
- Master of Public Health
- Master of Science in Criminal Justice
- Master of Science in Environmental Policy
- Master of Science in Homeland Security and Emergency Management
- Master of Science in Information Technology
- Master of Science in Management
- Master of Science in Psychology (non-licensure)
- Practical Nursing Diploma (offered entire onsite)

*Mason City*

- Associate of Applied Science in Accounting
- Associate of Applied Science in Business Administration
- Associate of Applied Science in Criminal Justice
- Associate of Applied Science in Fire Science
- Associate of Applied Science in Human Services
- Associate of Applied Science in Information Technology
- Associate of Applied Science in Medical Assisting
- Associate of Applied Science in Medical Office Management
- Associate of Applied Science in Paralegal Studies
- Associate of Applied Science in Public Administration
- Bachelor of Science in Accounting
- Bachelor of Science in Business Administration
- Bachelor of Science in Communication
- Bachelor of Science in Criminal Justice
- Bachelor of Science in Criminal Justice Administration and Management
- Bachelor of Science in Environmental Policy and Management
- Bachelor of Science in Fire and Emergency Management
- Bachelor of Science in Fire Science
- Bachelor of Science in Health and Wellness
- Bachelor of Science in Health Care Administration
- Bachelor of Science in Health Science
- Bachelor of Science in Human Services
- Bachelor of Science in Information Technology
- Bachelor of Science in International and Comparative Criminal Justice
- Bachelor of Science in Liberal Studies
- Bachelor of Science in Nutrition Science (non-licensure)
- Bachelor of Science in Political Science
- Bachelor of Science in Professional Studies
- Bachelor of Science in Psychology
- Bachelor of Science in Public Administration and Policy
- Master of Business Administration
- Master of Public Administration
- Master of Public Health
- Master of Science in Criminal Justice
- Master of Science in Environmental Policy

- Master of Science in Homeland Security and Emergency Management
- Master of Science in Information Technology
- Master of Science in Management
- Master of Science in Psychology (non-licensure)

## Registration Compliance

As required by Iowa Code Section 261B.4, Kaplan University discloses its policies for refunding tuition charges to withdrawn students. The University's policy complies with Iowa Code Section 714.23, and is published in the University's 2012-2013 catalog at [www.kaplanuniversity.edu/documents/catalog.pdf](http://www.kaplanuniversity.edu/documents/catalog.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. The University maintains these policies and discloses them in its academic catalog at [www.kaplanuniversity.edu/documents/catalog.pdf](http://www.kaplanuniversity.edu/documents/catalog.pdf).
- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy concerning tuition and mandatory fee charges for members of the Iowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member has been called to active (Iowa) state or federal military duty or service. Kaplan University will implement this policy for eligible students who withdraw on/after the date of registration and will publish the policy in its catalog or catalog supplement at the next available opportunity according to its publication schedule.
- 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. Kaplan University has a policy in place that complies with this requirement and provided a copy of that policy to staff.

*Student Consumer Information:* In its registration application, Kaplan University indicates that the disclosure requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8), are not applicable. Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by

the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. Despite the University's application response, the University provides these disclosures to students in the University's catalog, on its website, and in its enrollment agreement.

The University affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7. Effective July 1, 2012, these provisions of Iowa Code were modified to state that, provided the school does not claim "approval" or "accreditation," the school must disclose to students that it is registered by the Commission and provide Commission contact information for students who have questions or complaints about the school. The University provides information for the Commission on a state agency contact page in its catalog.

*Financial Responsibility:* Kaplan University submitted an independent financial audit report by PricewaterhouseCoopers LLP, dated June 28, 2011, for the Kaplan Higher Education Corporation and Subsidiaries' fiscal year ending December 31, 2010. The auditing firm stated its opinion that the institution's consolidated financial statements present fairly, in all material respects, the financial position of the University.

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 auditor's report states that Kaplan's calculated composite score for the year ending December 31, 2010, was 2.4.

*Full-Time Iowa Resident Faculty Member or Program Coordinator:* Kaplan University has 256 full-time employees who reside in Iowa. Most of these employees are assigned to one of the Kaplan campuses. A few appear to work remotely for the school from other Iowa locations. Staff identified 51 full-time faculty based on faculty rosters posted on each Iowa campus web site. Each Iowa campus has multiple full-time faculty members.

*Instructional/Supervisory Staff Qualifications:* It appears that Kaplan University hires individuals to provide instruction in its programs who qualify for their assignments, although staff notes that the University does employ a small number of faculty with baccalaureate degrees. It appears as though Kaplan University employs faculty with baccalaureate degrees in its pre-licensure nursing and medical assisting/office management programs. These individuals have either specialized degrees in nursing, which would seem to make them appropriately qualified for instruction in the University's pre-licensure, diploma or associate degree nursing programs, or baccalaureate degrees and professional certifications or experience that appear to qualify them to teach associate degree programs in medical assisting or office management. The vast majority of Iowa campus faculty have at least a master's degree.

*Commitment to Iowa Students and Teach-Out:* The University provided an Executive Officer's Statement signed by President Wade Dyke, in which President Dyke states his commitment to delivering programs located in Iowa. Further, President Dyke states that if, for any reason, Kaplan University should discontinue any programs or any of the campuses before students complete their courses of study, Kaplan University will provide alternatives for students to complete programs at other institutions or other compensate students affected by the closure.

*Physical Facilities:* The University provided photographs of its Iowa facilities and lease agreements for each of its Iowa campuses. Multiple Commission staff has visited the Kaplan University campuses across the state at the invitation of the University to provide federal student aid compliance training or other information about Commission initiatives and student services. Kaplan

maintains sites in Iowa that are modern, clean, provide ample parking, and are sufficiently spacious to accommodate administrative staff, student support services, library facilities, and student instruction. Kaplan campuses that offer specialized career training programs like nursing also provide learning laboratories for hands-on skill instruction.

## **Student Complaints**

Complaints from Kaplan University students constitute approximately one-third of the calls and complaint cases the Commission records for students attending for-profit institutions. Kaplan University has a consistent record of timely responses to student complaints and a historical willingness to resolve complaints when occasional school error occurs in a way that provides financial relief to the student. Kaplan University offers Iowa-based staff to work with Commission staff in resolving student complaints. Staff's primary student complaint resolution contact, Susan Spivey, the Cedar Rapids campus president, is consistently accessible to staff by e-mail and telephone for discussion, questions, and clarifications. Staff is quite satisfied with Ms. Spivey's role in facilitating student complaint resolution.

Regarding the nature of Kaplan student complaints, Commission staff has historically only received one complaint about quality of instruction which it referred to the University's accrediting agency. Otherwise, Kaplan complaints relate to federal student aid eligibility, federal student aid delivery timing, or return of federal funds in cases of student withdrawal. Staff determined that some student concerns relate to the student's lack of understanding about the federal rules that govern federal student aid eligibility determinations and funds delivery, and the return of unearned federal student aid when a student withdraws resulting in bills owed to the school. Staff determined that there are isolated instances in which Kaplan is late in delivering federal student aid funds to a student. However, upon bringing these concerns to the University's attention, the University takes quick action. Student complaint records reveal only one case in which staff questioned whether the student should have received a more favorable resolution relating to a federal student loan matter, and in that case, staff referred the student to the Federal Student Loan Ombudsman.

During the registration evaluation process, Commission staff brought two policy matters relating to federal student aid compliance to the University's attention. Both matters have been resolved to staff's satisfaction.

Generally speaking, staff has confidence in Kaplan University's commitment to maintain open and positive communications with the Commission, and to maintain compliance with federal and state expectations that impact students. In the past, Kaplan University has called upon Commission staff with expertise in federal student aid compliance repeatedly to provide guidance and training to its financial aid administrators. In addition to Cedar Rapids campus President Susan Spivey, staff recognize Kaplan's national campus financial aid director, Melissa Pritchard, and its state regulatory compliance manager, John Carreon, as key participants in developing and maintaining staff's confidence in the University's good faith efforts.

## **Compliance with Iowa Code Chapter 714**

### *Section 714.18 – Evidence of Financial Responsibility*

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

*Section 714.23 – State Tuition Refund Policy*

Iowa Code Section 714.23 requires “a person offering at least one postsecondary educational program, for profit, that is more than four months in length and leads to a recognized educational credential. . .” to provide a refund of tuition to a student who withdraws from the school’s program in an amount that at least meets the formula specified in Section 714.23. Kaplan University adopted a policy that complies with Iowa Code Section 714.23 for its Iowa-resident online students and for students that attend its Iowa campuses. This policy is disclosed in its 2012-2013 catalog.

**Iowa College Student Aid Commission**

**Ashford University Discussion  
November 2012**

Ashford University will be present during the November 16, 2012 Commission Meeting to respond to the September 22, 2012 letter requesting information.



September 22, 2012

Dr. Elizabeth Tice, President  
Ashford University  
400 North Bluff Blvd.  
Clinton, Iowa 52732

Dear President Tice:

Ashford University is formally authorized by the Iowa College Student Aid Commission (the Commission) to operate as a postsecondary educational institution in Iowa. The Commission understands that its authorization of the University is the pathway by which the University maintains its eligibility to provide federal student aid funding to its students. In addition, the Commission provides the State-based process for addressing the University's student inquiries and complaints that is another condition of the institution's eligibility to participate in the federal student aid programs.

As the University's primary State authorizing entity, the Commission is quite concerned about the issues which prompted the Western Association of Schools and Colleges (WASC) to deny the University's initial accreditation application. Since Ashford University was unsuccessful in its initial effort to achieve WASC accreditation, the University's compliance with all HLC requirements and conditions is crucial. The Commission has no record to date of receiving any notice initiated by the University or Bridgepoint Education concerning the recent WASC or HLC actions, or the University's response to those actions. Therefore, the Commission requests that Ashford University provide the Commission with all of the following information or documentation:

- Specific actions the University has taken to address the six areas of noncompliance that WASC described in its action letter dated July 3, 2012:
  - ✓ Attrition, support for student achievement, and adequate levels of degree completion
  - ✓ Alignment of resource allocations with educational purposes and objectives
  - ✓ Adequacy of the Ashford faculty model and the role of faculty
  - ✓ Effectiveness of program review
  - ✓ Assessing student learning and assuring academic rigor
  - ✓ Independence of the Ashford governing board
- A copy of the report the University provided to the HLC demonstrating its compliance with HLC's Criteria for Accreditation and Core Components on August 31, 2012, and September 21, 2012.

- The University's plan to demonstrate compliance with the HLC's policy on substantial presence in the HLC region in the event that migration to WASC does not occur or is significantly delayed.
- Per Iowa Administrative Code Section 283-21.2(261B), subsection 13, the University's *specific plan* to implement "alternatives for students to complete their programs at the same or other institutions if the applicant school closes the program before the students have completed their courses of study." The Commission requests that the University have a teach-out plan in place in the event, however unlikely, that it must close its programs because it is unsuccessful in obtaining WASC accreditation and is sanctioned by the HLC.

The Commission noted that some of the areas of concern identified in the WASC team report were related or similar to issues that have been reported to Commission staff by your students. These include the appearance of a greater emphasis on admissions/enrollment/recruiting staffing resources versus on-going academic and financial support for current students, concerns expressed by students about financial aid services generally and the timeliness of financial aid notice and delivery in particular, and promises students say the University made to them during the enrollment process that turned out not to be the case (e.g., in the case of Commission-received complaints, issues concerning transfer of credit and education program outcomes).

The Commission therefore requests the following additional information and documentation:

- The University's admission/enrollment/recruitment counselors/advisors handbook or other written procedures for these University employees, written job performance standards for admission/enrollment/recruitment counselors/advisors, current training presentations developed for admission/enrollment/recruitment counselors/advisors and written scripts provided to these employees.
- The University's plan to, generally, ensure that a student who requests financial aid as a payment option receives his or her financial aid award letter before the student is expected to begin attendance in a class for which the student will be charged.
  - ✓ The Commission requests that the University revise its award letter to include additional information about the total cost of attendance and the various components that comprise the cost of attendance figure used to determine the student's eligibility for federal student aid, the total award-year or academic-year amounts of grant or loan aid that have been awarded to the student, and any remaining unmet need that results.
  - ✓ The Commission requests that the University adopt an active confirmation process for federal student loans, including a statement on the award letter advising the student that he/she may request an amount of loan funds that is less than the awarded amount, providing the student with the opportunity to request a

lesser loan amount, and requiring the student to actively accept the original or lesser, student-requested loan award amount in each case.

- The University's current process for making books available to all students who are scheduled to begin attendance in a payment period before federal student aid funds are disbursed.
- An illustration (facsimile and screen shot) of the online and other documentation the University presents a student to request the student's authorization to hold a credit balance, the University's procedures for identifying students who have not executed an authorization, and the University's procedures for processing 1) credit balance payments, 2) authorized stipend payments, and 3) credit balance authorization revocations, including the role of its third-party contractor Sallie Mae and Sallie Mae staff in these processes. In addition, the Commission requests the University's procedures for auditing its contractor to ensure compliance with federal student aid cash management rules.
- The University's plan to improve student access to and the quality and consistency of academic and financial support and advisement services to students.

The Commission requests that Ashford University respond to each information and/or documentation request request above fully and in writing by Monday November 12, 2012. In addition, the Commission requests that appropriate, key Ashford officials make an in-person presentation to the Commission that summarizes its response during the Commission's meeting on Friday, November 16, at 10 a.m. central time, at the offices of the Iowa College Student Aid Commission, 603 E. 12<sup>th</sup> St., Des Moines Iowa 50319. Ashford officials should anticipate making themselves available for questions from Commissioners at this meeting.

Please communicate with Commission staff Carolyn Small at (515) 725-3413 or [carolyn.small@iowa.gov](mailto:carolyn.small@iowa.gov) if you have any questions about this information request.

Thank you for your cooperation.

Sincerely,

Janet Adams, Chair



**[IowaCollegeAid.gov](http://IowaCollegeAid.gov)**  
Your Financial Aid Connection



**Iowa College Student Aid Commission**

**Legislative Action Committee  
November 2012**

A legislative report will be provided during the November 16, 2012 Commission Meeting.