

IOWA COLLEGE STUDENT AID COMMISSION

Palmer College of Chiropractic Application for Voluntary Postsecondary Registration in Iowa August 5, 2016

STAFF ACTION:

Approve Palmer College of Chiropractic's voluntary application for postsecondary registration in Iowa for a two-year term that begins on August 5, 2016 and ends on August 5, 2018.

Registration Purpose

Palmer College of Chiropractic (Palmer) lawfully operates a postsecondary, degree-granting institution in Iowa under an exemption from registration in Iowa Code §261B.11(1)(j): "Higher education institutions that meet the criteria established under §261.9(1)." The criteria referenced in Iowa Code §261.9(1), establish institutional eligibility for the Iowa Tuition Grant Program. Palmer meets the Iowa Tuition Grant Program institutional eligibility criteria. Whether an institution actually awards funds from this state grant program is immaterial.

Thus, Palmer is not required to seek the explicit approval of the State of Iowa in order to lawfully offer postsecondary degree programs in Iowa. For the purpose of the federal Department of Education's rules in 34 CFR §600.9 that require federal student aid participating schools to be authorized by an action of the State in which the school is located, Palmer College is listed in Iowa Administrative Code 281-Chapter 21, by name, as a private nonprofit, degree-granting postsecondary educational institution that lawfully operates in Iowa.

Institutional Information

Palmer College is a private, non-profit postsecondary institution that provides instruction via face-to-face and distance education delivery modalities from its main campus located at 1000 Brady Street, Davenport, Iowa 52803. Palmer also provides instruction at additional locations in San Jose, California and Port Orange, Florida. Palmer's chief executive officer is Dr. Dennis Marchiori at the same address. The designated Iowa contact person for Palmer is Beth Barclay, at the same address. The Iowa Secretary of State records an active, domestic non-profit corporation registration # 79758 for Palmer. The Iowa registered agent Lynne Lindstrom.

Physical facilities: Each Palmer campus is more than adequate for instruction students. The Davenport campus is the largest of the three campuses with 14 major buildings and is home to the largest chiropractic research center in the world. It also has a library and student residences. A map of each of the campuses is available online at:

- ✓ <http://www.palmer.edu/about-us/campuses/davenport-iowa/>.
- ✓ <http://www.palmer.edu/about-us/campuses/port-orange-florida/>.
- ✓ <http://www.palmer.edu/about-us/campuses/san-jose-california/>.

Instructional Methodology: Educational delivery in the doctor of chiropractic degree program at all three campuses is largely traditional classroom-based instruction with accompanying hands-on labs. The program has a capstone clinical experience involving

patient care during the last year of instruction. The campuses utilize on-site and off-site outpatient clinics as well as community outreach clinics as training and evaluation venues for student performance. Due to the nature of the doctor of chiropractic degree program, some level of classroom-based instructions with hands-on skill development will always be required. However, Palmer also utilizes a learning management system, Desire2Learn to offer some education online synchronously and asynchronously for classes that do not have the need for hands-on skill development.

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

- Iowa Board of Chiropractic accredits Palmer's Doctor of Chiropractic Program
- Commission on Accreditation of the Council on Chiropractic Education also accredits Palmer's programs.

Federal Stafford Loan Cohort Default Rate: 2.1%. For comparison purposes, the national average default rate of all schools for the same reporting period is 11.8%.

Graduation Rate: Palmer reports the following graduation rates for each of its campuses:

- Davenport, IA Campus 87.1%
- Port Orange, FL Campus: 94.0%
- San Jose, CA Campus: 87.3%.

Average Loan Debt upon Graduation: Palmer reports the following average loan debt upon graduation of individuals completing the programs at the school:

- Davenport, IA Campus: \$155,252
- Port Orange, FL Campus: \$171,128
- San Jose, CA Campus: \$168,211.

Record Preservation: Palmer's student information system records are backed up nightly. Those electronic backups are stored and maintained by the school's Information Technology Department. Backup to existing infrastructure occurs in the campus server room and is secured by lock and key. The data is also secured by job role so that only network administrators have access to the backup locations and files. To prevent identity theft, students' non-public personal information is maintained in locking fire-proof files, and available only to authorized personnel. Upon graduation, the student file is scanned and kept in electronic format, which is backed up nightly. Personal information from a student's paper file that is no longer needed is shredded.

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

- Palmer Registrar's Office
1000 Brady Street
Davenport, IA 52803
(563) 884-5654

- ✓ <http://www.palmer.edu/students/resources-offices/administrative-services-registrar/transcript-request/>.

Student Learning Resources: Palmer College of Chiropractic provides students with a variety of on-campus and online resources to aid in academic achievement and career and personal development.

- The David D. Palmer Health Sciences Library is a three-campus networked library system that provides physical and virtual spaces, electronic and tangible resources and services, and programming that supports the mission and vision of the College. The library website provides uniform access to all electronic resources to patrons across the system. Local campus library facilities provide individual student and group study spaces, technologies and anatomical models for learning, convenient Wi-Fi Internet access to electronic resources, student computer labs, and print resources.
 - ✓ <http://library.palmer.edu/home>.
- The Chiropractic Learning Resource Center (CLRC) on the Davenport campus is 15,000 sq. ft. and resides on the third floor of the Academic Health Center. It provides dedicated space for interns during their clinical rotations to write reports, train on electronic health records (EHR) software, search the literature for evidence on patient conditions, and prepare for licensing exams.
- The Palmer Center for Business Development's programs incorporate instruction, mentoring, and hands-on application to advance chiropractic business skills and place graduates into chiropractic practice. Participants interact with experienced chiropractors and business experts in areas such as finance, real estate, technology, and marketing. Sophisticated, customized online programs, including the Palmer CareerNetwork, Locus, Optimal Resume and Interview Stream, offer high-tech networking and employment opportunities. Services offered at the Center include software that matches job seekers with employers based on shared preferences for specific techniques, philosophy, and other interests.
 - ✓ <http://www.palmer.edu/business/>.
- A free and confidential community-based counseling service called the Student Resource and Assistance Program is available for all Palmer students and immediate family. Palmer students seeking personal counseling resources for assistance with relationship issues, substance abuse, grief and loss, depression, anxiety or other mental health issues are encouraged to use this resource.
- A wide variety of student clubs and organizations provides a community framework in which students develop their own special talents and interests while contributing to the educational and social development of other students. Palmer is committed to supporting diverse interests through 51 student clubs and organizations on the Davenport campus, 23 on the Port Orange campus, and 33 on the San Jose campus. These clubs and organizations cover a wide spectrum of interests, including chiropractic techniques, academic and professional groups, community needs,

service and social clubs, fraternities and sororities, sports and athletics, and recreational clubs.

- ✓ <http://www.palmer.edu/students/>.

Curriculum Evaluation and Development: Annual program effectiveness and learning outcomes assessment reports are generated for each academic program. Results are disseminated among discipline faculties and recommendations solicited. Discipline faculty are involved in curriculum evaluation and development within their departments and through a Curriculum Management Committee (CMC) on each Palmer campus. The CMC committees are chaired by the campus academic dean or designee, and have broad membership including faculty, students, staff, and administrators. For each degree program, proposals for curricular change may be recommended by individual or groups of faculty, students, and/or administrators. A template for proposing curricular changes assures inputs including the rationale for the requested change, data supporting the change, proposed changes to student learning outcomes, a plan for assessment, and a new or revised syllabus (if the change requested impacts individual courses). When program or student learning data suggest revisions are necessary to course delivery, content, credit or contact hours, a proposal is brought to CMC by the appropriate department chair, director, or dean.

Student Complaints Process: Palmer provides student grievance procedures that cover various academic and program issues. Palmer also provides a grievance procedure for general complaints. Palmer provides information to outside agencies students may direct complaints to if the student is not satisfied with the administrative outcome of complaint. These procedures and contacts are located in the student handbook.

- ✓ <http://www.palmer.edu/students/resources-offices/handbook-policies/> at 37-41.

Programs Offered Under Registration

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

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

Programs Offered at the Davenport, IA Campus

- Doctor of Chiropractic - \$119,075
- Master of Science - \$17,313
- Bachelor of Science - \$23,410
- Associate of Applied Science - \$14,853

Programs Offered at the Port Orange, FL Campus

- Doctor of Chiropractic - \$120,507

Programs Offered at the San Jose, CA Campus

- Doctor of Chiropractic - \$118,258

Field Experiences:

Palmer students continue their development of clinical competency through continued care of patients in a Palmer Clinic outpatient facility or at a chiropractic field doctor's office through the Intern Preceptorship Program, an optional program for qualified students. Interns continue to be assessed daily by faculty clinicians or are evaluated by preceptor field doctors. Preceptorships may be taken locally or at an out of state location.

Registration Compliance

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

- ✓ http://www.palmer.edu/uploadedFiles/Pages/Marketing/Publications/Official_College_Documents/catlog-addendum.pdf.

Administrative rules specifically require the school to comply with the requirements of Chapter §261.9(1) "e" through "h" by implementing the following policies.

- Iowa Code §261.9(1)(e) requires a school to maintain and disseminate a drug and alcohol abuse policy that includes sanctions for violation of the school's policy and information about the availability of drug or alcohol counseling or rehabilitation.
 - ✓ http://www.palmer.edu/uploadedFiles/Pages/Students/Resources_and_Offices/Handbook_and_Policies/_pdf/IP-Drug-and-Alcohol-Use.pdf.
- Iowa Code §261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that includes information about counseling opportunities and reporting instances of sexual abuse to school officials and law enforcement. Palmer discloses these policies in its student handbook.
 - ✓ http://www.palmer.edu/uploadedFiles/Pages/Students/Resources_and_Offices/Handbook_and_Policies/_pdf/IP-Sexual-Misconduct.pdf.
- Iowa Code §261.9(1)(g) requires a school to maintain a special policy concerning institutional charges for members of the Iowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member or spouse has been called to active (Iowa) state or federal military duty or service. Palmer maintains a policy that is compliant with this requirement and will disclose the policy to students in its online Academic Catalog.
 - ✓ http://www.palmer.edu/uploadedFiles/Pages/Marketing/Publications/Official_College_Documents/student_handbook.pdf at 81.
- Iowa Code §261.9(1)(h) requires a school to develop and implement a policy for employees who, in the course of their employment, attend, examine, counsel, or treat a child and who suspect the physical or sexual abuse of that child. Palmer disclosed a policy that is compliant with this requirement.
- Iowa Code §261B.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. These disclosures are in place and

available to students through the College Catalog and at specific webpages on the school website.

- ✓ <http://www.palmer.edu/about-us/accreditation/catalog/>.
- ✓ <http://www.palmer.edu/admissions/financial-aid/tuition/>.
- ✓ http://www.palmer.edu/uploadedFiles/Pages/Marketing/Publications/Official_College_Documents/catlog-addendum.pdf.
- ✓ <http://www.palmer.edu/academics/>.
- ✓ <http://www.palmer.edu/about-us/accreditation/>.

Iowa Code §261B.7 states that, while a school must not represent that it is “approved” or “accredited” by the Commission or the State of Iowa, a registered school must disclose that the school is registered by the Commission on behalf of the state of Iowa and provide the Commission’s contact information for students who wish to inquire about the school or file a complaint. Palmer discloses the Commission’s information on its site for students to utilize should they need the information to file a complaint.

- ✓ http://www.palmer.edu/uploadedFiles/Pages/Marketing/Publications/Official_College_Documents/catlog-addendum.pdf.

Financial Responsibility: Palmer College submitted the financial audit report of an independent accounting firm, EideBailly CPAs & Business Advisors, dated October 26, 2015, for the institutional financial position as of May 31, 2015 and 2014. The accounting firm stated its opinion that the school’s financial statements present fairly, in all material respects, the school’s financial position.

A private non-profit school that participates in the federal student aid programs must maintain a composite score, based on a three-factor financial responsibility ratio, of at least 1.5 in order to be determined by the federal Department of Education to be financially responsible without additional oversight. Palmer’s independent auditor did not report nor test the Palmer’s financial responsibility composite score. The most recent financial responsibility composite score reported for Palmer by the federal Department of Education is for the institutional fiscal year ending May 31, 2014, when Palmer’s composite score was 3.0 (out of a possible 3.0).

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

Instructional/Supervisory Staff Qualifications: Palmer maintains easily accessible information about faculty on its website, organized by program, at <http://www.Palmer.edu/academics/Faculty.cfm>. Staff reviewed a sampling of faculty profiles for faculty at the Davenport campus that provide instruction in Palmer’s chiropractic programs. Of 35 faculty profiles reviewed, 30 are Doctors of Chiropractic and 5 are Doctors of Philosophy.

Commitment to Iowa Students and Teach-Out: By executing an electronic signature on the registration application, Palmer College President Dr. Dennis Marchiori committed to the delivery of programs Palmer offers and agreed to provide alternatives for students to complete programs at Palmer or another school if Palmer closes a program, or if Palmer closes before students have completed their courses of study.

Additional Information

Compliance with Iowa Code §714

§714.18 – Evidence of Financial Responsibility

Palmer College is exempt from the financial responsibility (i.e., bonding) requirements of Iowa Code §714.18. Palmer qualifies for the following exemption listed in Iowa Code §714.19(10): “Private nonprofit schools that meet the criteria established under Iowa Code §261.9(1).” The criteria established under Iowa Code § 261.9(1), is the *institutional* eligibility criteria that qualifies a school for participation in the Iowa Tuition Grant Program. Palmer meets the institutional eligibility criteria, and therefore qualifies for the financial responsibility exemption. For this purpose, whether a school actually awards funds from the Iowa Tuition Grant Program is immaterial.

§714.23 – State Tuition Refund Policy

The Iowa tuition refund policy does not apply to Palmer College because it is a private nonprofit institution.

Compliance with Iowa Code §261F

Palmer College posts on its website a Code of Conduct for Educational Loans addresses provisions of Iowa Code §261F. The Palmer Code of Conduct appears to be an accurate and comprehensive reflection of Iowa Code provisions that govern certain aspects of business relationships between private education loan lenders and school personnel who have responsibilities related to education loans. Staff finds no evidence that the school participates in any preferred lender arrangement or otherwise refers its enrolled students to any specific private education loan lender. The website provides generic consumer information that students should consider when evaluating and selecting a private education loan lender.