

IOWA COLLEGE STUDENT AID COMMISSION

DeVry University Application for Postsecondary Registration Renewal March 9, 2015

STAFF ACTION:

Approve DeVry University's application for postsecondary registration in Iowa for a two-year term that begins on March 9, 2015, and ends on March 9, 2017.

Registration Purpose

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this state or if the school otherwise has a presence in this state. Presence means a location in Iowa at which a student participates in any structured activity related to a school's distance education course of instruction. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations. Staff required DeVry University to apply for registration to offer distance education programs to Iowa residents because it compensates several Iowa residents to provide instruction in its distance education programs who work remotely for the University from an Iowa location.

Institutional Information

DeVry University is a for-profit postsecondary educational institution whose principal location is 3005 Highland Parkway, Downers Grove, Illinois. The University maintains instruction sites at more than 85 locations in the United States. The University supports its online programs from administrative offices located at 1200 E. Diehl Road, Naperville, Illinois. The Chief Executive Officer of DeVry University's online programs is Eric P. Dirst, President-Online Services, 3005 Highland Parkway, Downers Grove, Illinois. The national President of DeVry University is Robert Paul at 3005 Highland Parkway, Downers Grove, Illinois.

The parent company of DeVry University is DeVry Education Group. The President and Chief Executive Officer of DeVry Education Group is Daniel Hamburger. There is no single individual identified on the University's registration application as the owner of more than 10% of the University.

DeVry University's Board of Trustees is comprised of six individuals with business or academic backgrounds including the national President Robert Paul. With the exception of President Paul, none of the University's Board of Trustees are employees of the University or its parent company, DeVry Education Group. The Board of Directors of the University's parent company, DeVry Education Group is comprised of nine individuals, of whom only two are employees of DeVry Education Group. The remaining members of the DeVry Education Group Board of Directors are current or retired leaders in business, education, or law. It would appear that the University's Board of Trustees is sufficiently independent to make decisions free of influence

from its parent company, and that the parent company's Board of Directors includes members of academia to represent student interests.

DeVry University is registered as a foreign for-profit corporation #461188 with the Iowa Secretary of State's Office. Its registered agent and Iowa contact is CT Corporation System, 400 E. Court Ave., Des Moines, Iowa 50309.

Physical Facilities: Not applicable for a distance education program provider.

Accreditation: DeVry University is accredited by the Higher Learning Commission, a regional accrediting agency recognized by the federal Department of Education.

Federal Stafford Loan Cohort Default Rate (three-year FFY 2011 rate): 18.5%

For comparison purposes, the FFY 2011 three-year national average cohort default rate is 13.7%.

Graduation Rate: 31.4%. This is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion, as reported by the federal Department of Education for the entire institution.

Average Loan Debt upon Graduation: DeVry University reported the average debt for graduates of all of its campuses during fiscal year 2012: \$37,749.

Record Preservation: DeVry University follows records retention schedules recommended by the American Association of Collegiate Registrars and Admissions Officers (AACRAO) in that organization's publication *Retention of Records: Guide for Retention and Disposal of Student Records*.

The Registrar's Office at the metro campuses is considered to be the official repository for DeVry University undergraduate and graduate student academic records. However, several different departments at the various campus and center locations play important roles in the course of a student's enrollment, coursework, and graduation. Other units on campus are released from the responsibility to maintain student academic records for extended periods. Copies of student academic records accumulated by other departments need not be retained beyond the period of their administrative use in those offices. However, campus departments are expected to dispose of student academic records and copies of those records following the University's student records retention schedule. The University also has a separate retention schedule for faculty held student academic-related records that are unique to various departments and/or faculty offices.

Records that are electronically generated are maintained in the electronic system in which the record was created. Departments are encouraged to use electronic formats to manage and store information. Thus, document imaging is supported for hard copy paper records. Original source documents are typically retained until they are imaged and the electronic image is verified, i.e., it is clearly readable, indexed, and copied. The imaged copy becomes the official record and the source document is shredded.

Information technology (IT) systems that contain student data are backed up in University's primary data center and replicated to a secondary data center at intervals throughout the day. DeVU's primary and secondary datacenters are geographically dispersed and facilities are managed by two separate companies. If disaster is declared due to catastrophic event, IT systems are brought on line at the secondary datacenter with an objective to restore student data within 24 hours.

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

Registrar's Office
1200 E. Diehl Road
Naperville, IL 60563
(877) 496-9050
Undergraduate Fax: (630) 929-9713
Graduate Fax: (888) 333-8982
<http://www.devry.edu/current-students/transcripts-info.html>

Instructional Methodology: DeVry University only offers online courses to Iowa residents. The University uses an e-learning platform called eCollege to provide courses for online delivery. The majority of software needed by online students is accessible through the University, saving students from having to purchase software separately. The academic content of online programs is the same as the content of the programs offered at any DeVry University campus. Terminal course objectives have been developed for every course in every program the University offers, and those terminal course objectives are the same regardless of the delivery method. However, the menu of instructional activities for online courses is greater than what one would find available to faculty and students in a traditional classroom.

Students who are enrolled in online courses are assigned a coach for their first year. The coach's function is to guide students through planning and prioritizing their coursework as well as managing other life issues during the first year. In addition, a program-specific academic advising team assists students in their program planning and also facilitates any student-related issues.

Faculty use detailed course maps that have been developed for each course in the curriculum. Teaching and learning methodologies include:

- Textual content
- Multimedia – video and audio clips
- Asynchronous threaded discussions
- Exams
- Word and PDF document sharing (journal articles, text content)
- Excel document sharing
- PowerPoint presentation sharing
- Instructor announcements
- Instructor presentations
- Email communication with individual students
- Synchronous chat, phone, and video conferencing
- Website and library links

DeVry University has developed and implemented a comprehensive assessment and new faculty training program for faculty and provides professional development opportunities for continuing faculty. The structured faculty training and orientation program consists of a four-week workshop in which new professors complete written assignments, threaded discussions and webinars to help them transition to the online classroom. The faculty training/orientation program is conducted during the session before the professor first teaches in the online format. The faculty orientation is facilitated by the online faculty management group within each DeVry University department. If the candidate successfully passes new faculty orientation, he or she continues on to teach the first online course in the next session. A new faculty member is assigned to a faculty manager, who serves as a mentor to the new faculty member teaches the first online course.

Faculty managers also assist with professional development for continuing professors. These managers work with each professor on a plan that meets the faculty member's individual needs. Online courses use learning platform technology to monitor course participation for both students and faculty members to ensure that quality standards are maintained. The University provides a Faculty Resources Center which contains information and workshops that faculty may access 24/7.

Student Learning Resources: The DeVry University online Library services both undergraduate and graduate students, providing access to a variety of periodical and research databases and eBooks 24/7 at <http://library.devry.edu/>.

Databases accessible through the University Library include the following:

- ABI-Inform Global (ProQuest) containing in-depth coverage of business conditions, management techniques, business trends, management practice and theory, corporate strategy and tactics, and the competitive business landscape worldwide. Also includes the Wall Street Journal Eastern edition, 1984 to the present, and profiles for 60,000+ companies and their executives.
- Academic Search Complete (EBSCOhost), a scholarly, multi-disciplinary periodical database, covering the sciences, humanities, social sciences, business, health sciences, engineering and technology that includes more than 7100 full-text periodicals and more than 6100 peer-reviewed journals.
- Agricola (EBSCOhost), containing nearly five million citations from the U.S. Department of Agriculture's National Agricultural Library.
- Alt Health Watch (EBSCOhost), which focuses on many perspectives of complementary, holistic and integrated approaches to health care and wellness. It offers libraries full-text articles for more than 180 international and often peer-reviewed journals and reports. In addition, there hundreds of pamphlets, booklets, special reports, original research and book excerpts.
- Business Source Complete (EBSCOhost), a scholarly business database, providing the leading collection of bibliographic and full-text content of peer-reviewed, business related journals such as the Harvard Business Review.
- CINAHL (EBSCOhost), which provides access to more than 750 nursing and allied health journals.

- Communication and Mass Media Complete (EBSCOhost), a database containing numerous journals in communication, mass media, and other closely-related fields of study.
- Computers and Applied Sciences Complete (EBSCOhost), which covers the research and development spectrum of the computing and applied sciences disciplines. It contains knowledge on traditional engineering challenges and research, and is a resource for research concerning the business and social implications of technology.
- Consumer Health Complete (EBSCOhost) covers all areas of health and wellness from mainstream medicine to many perspectives of complementary, holistic, and integrated medicine.
- Education Research Complete (EBSCOhost) covers all levels of education from early childhood to higher education, all educational specialties, such as multilingual education, health education, and testing, curriculum, instruction, administration, policy, funding, and related social issues.
- ERIC (EBSCOhost) is the largest education database in the world, sponsored by the Institute of Education Sciences of the U.S. Department of Education. This database contains over 1.3 million citations for journal articles, books, research papers, conference papers, technical reports, policy papers, dissertations, theses, and other materials in the field of education.
- Greenfile (EBSCOhost) contains more than 375,000 records covering all aspects of human impact to the environment, with full-text for over 4,500 records.
- Health Business Elite (EBSCOhost) provides comprehensive journal content detailing all aspects of health care administration and other non-clinical aspects of health care institution management.
- Health Source: Nursing/Academic Edition (EBSCOhost) contains 550 scholarly, full-text journals as well as over 6,000 generic and brand name drug patient education sheets.
- IEEE Xplore provides access to some of the world's most important publications in electrical engineering, computer science and electronics published by the Institute of Electrical and Electronics Engineers and its partners.
- LexisNexis Academic provides access to news, business, and legal publications. News coverage includes previously published and up-to-the-minute stories from English and non-English language sources. The Company Dossier module retrieves detailed company information and financial performance measures. It also includes Shepard's Citations, which provides access to all federal and state court cases dating back to 1789.
- Professional Development Collection (EBSCOhost) contains information geared towards educators, librarians, and education researchers on topics ranging from children's health and development to cutting-edge pedagogical theory and practice.
- Psychology and Behavioral Sciences Collection (EBSCOhost) covers topics such as emotional and behavioral characteristics, psychiatry and psychology, mental processes, anthropology, and observational and experimental methods.
- SocINDEX with Full-Text (EBSCOhost) is a comprehensive sociology research database, containing full text for more than 820 journals dating back to 1908. Also includes full text for more than 830 books and 14,600 conference papers.

The DeVry University Library system also houses more than 300,000 printed books. Students may request a printed book and the University will ship the book to the student's home location.

The DeVry University Library website contains a number of resources designed to help students navigate the online Library and find out more information about the support services the online Library provides to students:

- A list of all available databases.
- Instructions on searching the library catalog in multiple ways.
- Downloadable instructions on topics such as how to use a database, getting started with library research, troubleshooting computer issues, searching resources effectively, evaluating websites, and citing resources.
- A searchable Knowledge Base which provides the answers to frequently asked questions about the Library, its resources and services.
- Ask a Librarian. Students may contact one of over 30 professional librarians for assistance by email, phone, or live chat during online Library service hours Monday – Thursday noon to 10 pm; Friday noon to 7 pm, Saturday 1 pm to 5 pm, and Sunday 3 pm to 7 pm.
- A list of external websites organized by academic subject matter.
- Library instruction sessions in the classroom.

At the beginning of each term, the University Librarian coordinates the distribution of materials to all incoming students that describes resources and services available to them through the Library. As part of an end-of-term survey, students are asked to comment on the degree to which the Library supports the students' ability to apply research and complete their coursework.

Smarthinking, a 24/7 online tutorial service, is made available to students. This service enables students to chat with a live tutor, submit their writing for review, or submit a question to a tutor. Students access Smarthinking on the TutorSource page in their online course shell.

DeVry University also maintains a Career Services department staffed with professionals to assist students in career development. Services include career advising, online tools, and access to tens of thousands of job listings. Career Services are complimentary and available to University students throughout their lifetime after graduation.

Curriculum Evaluation and Development: In response to continuing technological and business change as well as to the increasing focus on assessment of student learning outcomes by accrediting bodies, DeVry University maintains a Continuous Curriculum Assessment and Improvement (CCAI) process. The Continuous Curriculum Assessment and Improvement process is driven by the University's mission and purposes and by its strategic plan and organizational goals and priorities. Program goals are developed and updated to reflect the broader purposes of the organization by a system-wide curriculum committee of deans and chairs. This committee monitors and analyzes developments in business and industry and, with input from placement offices, admissions offices, Program Advisory Committees, and broad participation at all levels by faculty, develops and adjusts the goals of the program(s). Program Review Meetings held at each major campus provide vital input to this process.

The DVU curriculum assessment and improvement framework has two interrelated components. The first is a long term component, which is designed to address curriculum change in light of the dynamic and changing University strategic goals, as well as changes in disciplines and

educational delivery approaches. The second component is based on a session-to-session improvement to courses which have been identified and targeted for improvement as a result of some assessment task. The steps of the CCAI process are as follows:

Long term component:

1. Update program and curriculum goals.
 - Conduct environmental analysis and obtain input from key constituencies.
 - Identify important educational, business, and technology trends and develop strategic responses.
 - Use results of direct and indirect as well as formative and summative assessments.
 - Use results of Program Review meetings.
2. Define or analyze knowledge, skills and abilities (KSAs).
 - Conduct local industry focus groups, with faculty and deans' participation.
 - Identify KSAs required for job entry and career growth.
3. Develop educational objectives and courses.
 - Convert graduate competencies into educational objectives.
 - Cluster objectives into courses.
4. Develop or adjust overall program curriculum structure.
 - Produce proposals for new courses or update specifications for adjusting or eliminating existing courses.
 - Review campus budgets.

Session-to-session component:

5. Develop or update curriculum guides and other course specifications.
 - Develop curriculum guides including standard course description, topical outlines, terminal course objectives, delivery strategy, text recommendations, lab specifications, sample syllabus, sampled assignments and projects, and assessment rubrics when applicable.
 - Develop specifications for additional course resources such as software laboratories.
6. Develop course materials.
 - Conduct course shell development or maintenance process.
 - Conduct course subsidiary materials set-up process.
7. Implement curriculum.
 - Develop individual teaching plans to achieve the terminal course objectives and program objectives.
 - Deliver new or adjusted courses to students.
8. Assess program and course outcomes.
 - Measure student evaluations through end-of-term surveys.
 - Conduct core course-level formative assessments to measure program objectives.
 - Conduct course-level formative assessments at the specialization level.
 - Conduct summative program assessment in the Senior Project or Capstone courses.
 - Conduct summative program benchmark assessments.
 - Conduct indirect measures that include alumni and employer surveys.
9. Adjust curriculum and course objectives.
 - Use direct and indirect assessment results and data to formulate curriculum improvement recommendations from Learning Outcomes Committee, faculty, deans, and program directors for consideration in the next stage of improvement.

Student Complaints Process: DeVry University maintains a general complaint policy that a student may use to address any component of the student's experience at DeVry. This complaint policy is disclosed to students in the University's online campus Student Handbook <http://www.devry.edu/d/devry-online-student-handbook.pdf>.

In most cases, students should first attempt to resolve their concerns informally, beginning with the individual(s) most directly connected to the student's complaint. If an online student is not comfortable discussing the matter with the individual(s) most directly involved, the student should contact his or her Academic Advising Team Lead. Unlike in formal complaint procedures, a complainant pursuing informal resolution of his/her complaint usually is not required to submit a written complaint to initiate the process. Under these informal procedures, the student may, at any time, elect to stop further action by withdrawing the complaint, subject to the confidentiality provisions noted below and with the understanding that, depending on the nature of the allegations, DeVry may be obligated to investigate the complaint with or without the complainant's involvement.

Complaints addressed informally may not be investigated to the same degree as formal complaints. Mediation may be used as a method for resolving the complaint informally, but not all complaints are appropriate for mediation. For example, allegations of sexual misconduct are not appropriate for mediation. Adopting informal procedures for addressing complaints does not mean that the institution does not take these complaints seriously. Informal procedures simply provide an alternative method for addressing complaints.

The complainant can also decide to file a formal complaint, as described below, at any time.

A. When to File a Complaint

Complaints should be filed by the student as soon as possible so that DeVry can address them contemporaneously. In most cases, DeVry will expect the student to come forward within 15 days of the student becoming aware of the concern or the student's last conversation in the informal process.

B. What to File

A formal complaint should be in writing and include the following:

- The complainant's name, student identification number, address, email address, and phone number.
- A complete description of the concern/issue – including date, location, and all individuals involved, either in the conduct complained of or as witnesses.
- A description of what efforts, if any, have been made to resolve the issue informally, including individuals contacted by the student in the resolution attempt.
- A statement of the resolution requested.

If a student is hesitant or unwilling to put a complaint alleging discrimination, harassment (including sexual misconduct) or other unlawful conduct in writing, he or she is encouraged to discuss his/her concerns with the Student Central Manager or Academic Affairs Specialist or Academic Advising Team Lead (for online students).

Similarly, if a student feels that changes to academic or other situations are appropriate or necessary to preserve the student's safety or well-being as a result of the circumstances involved in a complaint, he or she is encouraged to request assistance from the Student

Central Manager, Academic Affairs Specialist, or Academic Advising Team Lead (for online students).

C. Where to File Complaint

The complaint should be filed with the Student Central Manager or Academic Affairs Specialist at the location the student is attending. Online students should file with their Academic Advising Team Lead. If the person holding one of these positions is the subject of the student's complaint, the student can submit the complaint to the Academic Advising Manager, who will determine the appropriate person to conduct the investigation. The written complaint can be submitted electronically, in person, or by mail.

D. Notice of Receipt

Upon receipt of the formal complaint, the Student Central Manager or Academic Affairs Specialist or Academic Advising Team Lead (for online students) should provide the complainant with a written notice acknowledging its receipt (via email and/or mail) and should review the complaint.

E. Investigation

The Student Central Manager or Academic Affairs Specialist or Academic Advising Team Lead (for online students) or his/her designee will initiate an investigation. The extent and components of the investigation will vary depending on the allegations and circumstances.

F. Findings and Notification

Upon completion of the investigation, the Student Central Manager or Academic Affairs Specialist (for online students, the Academic Advising Team Lead) will report the findings of the investigation and any proposed resolution to the complainant. It is DeVry's goal to conduct an appropriate investigation and report back to the complainant in a timely manner, usually within 45 days of receipt of the complaint. The circumstances in particular cases may make a shorter or longer investigation necessary or appropriate.

G. Appeal

Within 10 calendar days of the issuance of the final report, the complainant may appeal to the Academic Advising Team Lead, or if the issue involves the Academic Advising Team Lead, the student may appeal to the Academic Advising Manager. Appeals must be submitted in writing and must state a basis for the appeal. Bases on which a student may appeal are:

- There is new evidence that was unavailable at the time of the original investigation that would affect the outcome of the original decision.
- There were procedural irregularities in the complaint process that affected the outcome.
- The proposed resolution was not reasonable based on the evidence compiled during the investigation.

A copy of the University's written decision on the appeal shall be sent to the complainant in a timely manner. If the appeal decision requires further action, that action should be described in the appeal decision letter. The decision of the University is final.

Students not satisfied with the final disposition of the complaint process may contact the state licensing authority, the University's accrediting agency or the appropriate state attorney general. A complete list of contact information for state licensing authorities and state attorney

general offices is located at

http://www.devry.edu/content/dam/dvu/www_devry_edu/d/Complaint-Process-Information.pdf.

DeVry University provides information about its general student complaint process in its undergraduate and graduate catalogs, and in its online campus Student Handbook at <http://www.devry.edu/d/devry-online-student-handbook.pdf>.

Distance Education Programs Offered In Iowa

The total, estimated cost of tuition, fees, books and supplies for each program the University System offers is included in separate lists of the University's undergraduate and graduate programs.

Registration Compliance

As required by Iowa Code Section 261B.4, DeVry provided an institutional policy on refunding tuition charges for withdrawn students that meets the requirements of Iowa Code Section 714.23. The University discloses the Iowa-compliant policy as an addendum to the enrollment agreement for all Iowa-resident online program students.

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

- Iowa Code Section 261.9(1)(e) requires a school to maintain and disseminate a drug and alcohol abuse policy that includes sanctions for violation of the school's policy and information about the availability of drug or alcohol counseling or rehabilitation. Iowa Code Section 261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that includes information about counseling opportunities and reporting instances of sexual abuse to school officials and law enforcement. These requirements duplicate policies and disclosures required by the federal Department of Education for a school that participates in the federal student aid programs. DeVry University complies with the requirements of Iowa Code Section 261.9(1)(e) and (f) and discloses these policies to students in its Student Handbook and web-based student disclosures:
 - ✓ http://www.devry.edu/content/dam/dvu/www_devry_edu/d/annual-disclosure-Online.pdf.
 - ✓ <http://www.devry.edu/d/devry-addison-student-handbook.pdf>.
- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy concerning institutional charges for members of the Iowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member has been called to active (Iowa) state or federal military duty or service. The University provided a policy ready for implementation upon registration approval that is compliant. The policy will be disclosed to Iowa-resident online program students as an addendum to the student's enrollment agreement.
- 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. During the registration evaluation process, DeVry University developed a compliant policy that will be distributed to DeVry Education Group employees residing in Iowa. The information in the policy will be added to the DeVry Education Group institution's individual Sexual Misconduct Response and Prevention policies at the next regularly scheduled update during the summer of 2015.

Student Consumer Information: In its registration application, the 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. DVU provides these disclosures in its online catalogs at <http://www.devry.edu/academics/catalog.html>.

In its registration application, DeVry University affirms that it will comply with the provisions of Iowa Code Section 261B.7. These provisions of Iowa Code state that the school may not claim Commission "approval" or "accreditation," but 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. DeVry University will disclose this information on its state authorization web page and on its state-specific student complaint referral page:

- <http://www.devry.edu/academics/accreditation.html?iam=-1>.
- <http://www.devry.edu/d/Complaint-Process-Information.pdf>.

Financial Responsibility: Staff accessed the most recent independent audit report of DeVry Education Group (the University's parent company) by the independent auditing firm PricewaterhouseCoopers LLP dated August 27, 2014. For the institutional fiscal years ending June 30, 2014 and 2013, the auditing firm states that the consolidated statements, of income and cash flows present fairly, in all material respects, the financial position of DeVry Education Group and its subsidiaries. Also, in the opinion of the auditing firm, DeVry Education Group maintained, in all material respects, effective internal control over financial reporting as of June 30, 2014.

- A for-profit institution that participates in the federal student aid programs must maintain a composite score, based on a three factor financial responsibility ratio, of at least 1.5 in order to be determined "financially responsible" without additional oversight. DeVry Education Group discloses that its composite score has exceeded the minimum of 1.5 for several years but does not report its most recent composite score. The most recent composite score reported by the federal Department of Education for DeVry University was for the institutional fiscal year ending June 30, 2012: 2.2 (out of a possible 3.0).
- A for-profit institution is prohibited from deriving more than 90% of its revenue from Title IV aid. In its 2014 annual report, DeVry Education Group discloses that the percentage of DeVry University's revenue derived from Title IV funding during the institutional fiscal year ending June 30, 2013 was 72% for its undergraduate programs and 70% for its graduate programs.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Administrative rules effective January 15, 2014, exempt schools that offer purely distance education programs from any requirement to employ a full-time Iowa-resident faculty member or program coordinator. DeVry University applied for Iowa registration to offer only distance education programs. However, the University employs one full-time and 19 part-time online program faculty members who are Iowa residents and who work remotely for the University from an Iowa location:

- Neal L. McGregor (full-time): Ph.D. Management and Administration; professional experience in postsecondary education and business management.
- James B. Anderson (part-time): Ph. D. in English; seminar and workshop leader in topics such as effective writing, persuasive speaking and leadership since 1976; experience in international marketing and media productions.
- Richard Q. Barrett (part-time): J.D. in law; professional experience in healthcare, taxation, and accounting.
- Sally J. Becker (part-time): Master of Arts in Business & Technical writing; professional experience in secondary and postsecondary education.
- Victoria A. Bjerke (part-time): Ph.D. in Organization and Management; professional experience in postsecondary education, marketing and communications.
- Sherry Buell (part-time): Ed. D. in Education; professional experience in human resources management since 1978, and postsecondary education.
- Peter J. Conis (part-time): Ph.D. in Social Deviance and Social Organization; professional experience in criminal justice and postsecondary education.
- Samantha T. Duhn (part-time): Ph.D. in Business Administration; professional experience as a financial controller for private businesses.
- Keith M. Fontano (part-time): Master of Science in Organizational Leadership; professional experience in military leadership and postsecondary education.
- Michael A. Gunia (part-time): Master of Science in Computer Engineering; professional experience as the program chair in a college engineering department and systems project management.
- Elizabeth M. Herman (part-time): Ph.D. in Knowledge Management; professional experience in healthcare leadership and information management business processes.
- William J. Hitchcock (part-time): Master of Business Administration; professional experience in postsecondary education and financial analysis.
- Mary A. Hunt (part-time): Masters of Science in Adult Education and Human Resource Administration; professional experience in postsecondary education since 1998.
- Greg M. Laffey (part-time): Master of Business Administration; professional experience in business project management and postsecondary education.
- Maureen A. Lockwood (part-time): Ph.D. in Management; professional experience in manufacturing management and production management.
- Susan S. Reutter (part-time): Master of Science in Human Services; professional experience in postsecondary education and criminal justice.
- Jeanette Tate (part-time): Master of Science in Sociology; professional experience in postsecondary education since 2000.
- Deborah Thompson (part-time): Master of Arts in Professional Writing; professional experience as a postsecondary teacher of writing and English as a Second Language.

- Richard R. White (part-time): Master of Business Administration; professional experience in information systems management.
- Spencer L. Willardson (part-time): Master of Strategic Intelligence; professional experience in military counterintelligence and postsecondary education.

Instructional/Supervisory Staff Qualifications: According to the University's 2014 Annual Report, it employs 4,090 full-time faculty, 40 part-time faculty, and utilizes approximately 6,000 independent contractors who teach as adjunct faculty and instructors. DVU reports that it requires full-time faculty to have at least a master's degree, and states that approximately 50% of its full-time, on-campus and online program faculty members hold doctoral degrees. Staff found that of 92 full-time faculty members identified in the University's catalog who teach in the online programs, 46% held a doctoral degree. The University reports that faculty members teaching in technical areas have related industry experience and many faculty members in the Keller Graduate School of Management are practicing professionals who bring their expertise to the classroom. Faculty members are evaluated based on student comments and observations by an academic dean.

Staff reviewed available educational credentials of 92 full-time, online program faculty members and 213 adjunct, online program faculty members that are listed in the University's catalog and on its website. All 92 full-time, online program faculty members hold at least one master's degree. Approximately 42 full-time, online program faculty members have a doctoral degree. The educational background of all faculty members reviewed appears to be adequate to address the topical focus of the program in which the faculty member teaches or, for undergraduate students, the general education topic (e.g., English and mathematics) for which the faculty member provides instruction.

Commitment to Iowa Students and Teach-Out: The University's application is accompanied by a signed statement from Eric P. Dirst, DeVry University President of Online Services affirming the University's commitment to delivery of its online programs to Iowa residents and agreeing to provide alternatives for students to complete programs at other institutions if the University closes the program before students have completed their courses of study.

Student Complaints: None.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

DeVry University has filed satisfactory evidence of financial responsibility, including a continuous corporate surety bond payable to the State of Iowa in the amount of \$50,000, issued by Traveler's Casualty and Surety Company of America.

Section 714.23 – State Tuition Refund Policy

The University's tuition refund policy for Iowa resident students who withdraw from its distance education programs complies with the provisions of Iowa Code Section 714.23. See "Registration Compliance" above for more information.