

## IOWA COLLEGE STUDENT AID COMMISSION

### Embry-Riddle Aeronautical University Application for Postsecondary Registration March 6, 2015

#### **STAFF ACTION:**

***Approve the Iowa registration request for Embry-Riddle Aeronautical University for a two-year term that begins on March 6, 2015, and ends on March 6, 2017.***

#### **Registration Purpose**

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 (effective July 1, 2012) require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this state or if the school otherwise has a presence in this state. Presence means a location in Iowa at which a student participates in any structured activity related to a school's distance education course of instruction. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations. Embry-Riddle Aeronautical University (ERAU) applied for registration to offer distance education programs. Staff required ERAU to register because it compensates an Iowa resident(s) to provide instruction in its distance education program courses from an Iowa location.

It should be noted that Embry-Riddle Aeronautical University also proposes to:

- Provide college-level courses in certain Iowa high schools for high school and college credit. In some cases, instructors compensated by Embry-Riddle may be conducting instruction in these individual courses. Students taking these courses will be enrolled in high school, and will not be classified as degree-seeking students by the University.
- Offer individual, continuing education courses at Iowa ground locations.

Neither of the aforementioned scenarios, in and of themselves, invoke registration.

#### **Institutional Information**

Embry-Riddle Aeronautical University is a private non-profit institution whose main campus is located at 600 South Clyde Morris Boulevard, Daytona Beach, Florida. The school also maintains a residential campus at 3700 Willow Creek Road, Prescott Arizona, and it has instructional sites at more than 150 locations in the United States, Europe, Asia, and the Middle East. The school's chief executive officer is President John P. Johnson at the Daytona Beach, Florida location. Due to the fact that the University is applying for registration to offer only online programs, it has no Iowa contact person. The University is not registered with the Iowa Secretary of State as a corporation conducting business in Iowa, and the Commission cannot require that it do so.

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

*Accreditation:* ERAU is accredited by the Southern Association of Colleges and Schools – Commission on Colleges (SACS), a regional accrediting agency recognized by the federal Department of Education.

*Federal Stafford Loan 3-year Cohort Default Rate (FFY 2011):* 4.6%

For comparison purposes, the FFY 2011, 3-year national average cohort default rate is 13.7%.

*Graduation Rate:* 50%. 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 for Embry-Riddle Aeronautical University Worldwide.

*Average Loan Debt upon Graduation:* \$15,779.

*Record Preservation:* Records held by University departments and offices are subject to a variety of retention requirements. Each University department, office, or other unit responsible for production, management, or handling of a distinct type of record shall ensure those records are retained and disposed of in accordance with applicable legal, policy, and other retention considerations. This policy is intended as guidance in implementing retention programs in University operating units that address the specific needs of each department or office. Unit supervisors should consult this policy in forming their retention program. Unit programs should strive to classify records by type and offer retention schedules for those records. Each level of supervision over areas in which covered records are produced, managed, or retained is responsible for ensuring their areas comply with this policy and applicable law. The Cabinet member to whom each area reports is ultimately responsible for ensuring compliance.

University departments, offices, and other units shall develop their own retention programs guided by retention requirements of the records it manages, and shall request advice and counsel from the Legal Department, Information Technology, and other appropriate offices as needed. In forming its program, each unit shall consider what records require retention, the location of stored records (including individual computer hard drives, storage devices, and server shared file space), the retention period, and the disposal method once the record's retention period has expired. Each unit shall have a continuing duty to remain current on record retention requirements for their areas and update their programs as appropriate. A sample record classification form has been developed to assist with this task.

To help ensure that information entrusted to University custody and control does not end up in improper hands, the Record Custodian shall ensure that records eligible for destruction that contain confidential information are timely shredded, erased, or otherwise safely destroyed in a manner approved by the Chief Information Officer. The Record Custodian is the designated University official charged with responsibility for the management of a specific record type, usually an employee in the record's office of origin. Non-confidential paper records may be recycled. All copies of records eligible for destruction shall not be retained in the unit of origin but shall be destroyed in accordance with applicable policy, procedure, and protocol. Unofficial files should be similarly destroyed.

The Office of Records and Registration ensures accuracy and confidentiality of student academic records. This office strives for continuous improvement by embracing emerging technologies and best practices in enrollment, records maintenance, reporting, and policy interpretation and implementation.

ERU data back-up systems provide reasonable assurance that data stored in the University's electronic systems are backed up in a timely manner and secured stored. Full backups are performed weekly and differential backups are performed daily. Backup tapes are rotated to off-site storage on a weekly basis and can be recalled by authorized personnel as needed. ERAU has an agreement with Daytona State College to hold its student records for at least 50 years in the event that ERU closes.

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

Worldwide Registrar Services  
Embry-Riddle Aeronautical University  
600 South Clyde Morris Boulevard  
Daytona Beach, FL 32114  
(866) 393-9046  
<http://worldwide.erau.edu/admissions/transcripts/>

*Instructional Methodology:* Distance education. EagleVision is the University's virtual classroom. It combines the power of web video conference and learning management system called Canvas to maximum the benefits of both asynchronous and synchronous learning. Synchronous learning provides live interaction with a faculty member and is facilitated through web video conferencing. This learning method enables students to ask real-time questions and see fellow students via webcam. It is particularly useful for content-heavy courses, such as math or physics, so that students can get their questions answered instantly.

Canvas is a cloud-based system that is viewable on any web browser, computer or mobile device, and for engagement and collaboration through video, audio, integrated media recorder, text, and discussion boards. Eagle Vision also utilizes other collaborative technologies such as online chatrooms, polling, and lesson playbacks. Students may choose to receive notifications and course updates through Canvas or email, text message, Facebook, and Twitter. Tests and assignments are turned in through Canvas. Canvas' SpeedGrader system converts documents automatically so that instructors can preview and annotate student submissions without having to download or upload files. The inline annotation tool enables highlighting, strikeout, and freehand drawing.

In 2014, ERAU launched its Virtual Crash Lab to enhance student experiences in the University's College of Aeronautics' safety courses. In this environment, students can practice accident investigation techniques by examining the aircraft accident scene, documenting evidence, and interviewing survivors. Students gather and submit data that satisfy certain accident investigation criteria, such as survival factors, human factors, aircraft structures, aircraft systems, operations, and maintenance. Faculty members are then able to assess student knowledge and comprehension by examining the evidence collected and the student's explanation of findings.

In cooperation with its development partner Pinnacle Solutions, the University is developing the next virtual learning environment; The Robotics Lab. This virtual environment will use Unmanned Aircraft Systems as the primary platform to design, test, and evaluate components, designs, and operational tactics. The environment will consist of a test bench, assembly area, and three separate flight environments.

An online learning orientation class (ORNT 001) offers students instruction in navigating and using the University's online delivery platform, introduces students to the Hunt Library, and provides students with success strategies for optimal online learning. During this course, students progress at their own pace through multiple modules. Module topics include online learning basics, the online learning environment, fundamentals, library training, ERAU online policies, and success strategies. The tutorial includes considerable video and interactive demonstration to help students prepare for online learning. There is no charge for this course.

Generally, students should plan to spend 8-12 hours per week on class work. Advisors, many of whom are ERAU online program graduates, work with students to develop personalized degree maps that illustrate how and when students will graduate from day one of the student's degree program.

*Student Learning Resources:* The University provides a variety of academic support services including library support, information technology, advising and counseling, tutoring, disability support, student programs, and career services.

- Information Technology ("Tech") Support staff is available 24 hours a day, seven days a week. Students may initiate an online chat to speak live with a Tech Support staff person. With the student's permission and if necessary to provide assistance, Tech Support staff has the ability to remotely access the student's desktop. A student may also contact Tech Support by phone or via email for non-critical issues.
- Career Services maintains a website that offers students and alumni a virtual library of job search aids, including interview tips, sample resumes, and cover letters, resources for experienced job seekers, and links to other valuable websites. In addition, exclusive resources, co-op or internship opportunities, and current job listings can be found in the University's career management system, known as the EagleHire Network. A Virtual Hiring Event is held every spring through the EagleHire Network. Worldwide alumni and students are encouraged to publish their resumes on the EagleHire Network. Worldwide Career Services also provides resume critique assistance. Students are encouraged to begin utilizing these resources early in their education to explore career options and develop a successful job search strategy.
- English language tutoring is available through Electronic Access to Grammar, Language and Essay Tutoring (EAGLET). Video instruction is available to assist students with writing projects.
- The Math Online Tutorial gives online students the resources to refresh their basic and advance math skills at their own pace. This series of tutorials provides a practical, hands-on, systematic math review on topics students will study in ERAU Worldwide math courses, from basic arithmetic through algebra, geometry, and trigonometry. The

tutorials include many opportunities for practice in the forms of exercises and practical applications with instant feedback.

- The Hunt Library website provides 24/7 access to EAGLEsearch, which allows researchers to search much of the Hunt Library's collection simultaneously, including the Library's online catalog, Voyager, and a multitude of online databases. Many of these databases include full-text resources. Students attending the Worldwide campus, regardless of location, have circulation (i.e., check out) privileges, online quick help opportunities and access to web document delivery. Services available from the Library include the following:
  - ✓ Ask A Librarian: Research Desk help is available via chat or toll-free telephone Monday – Thursday 8 am to 10 pm, Friday 1 am to 6 pm, Saturday 12 pm to 6 pm, and Sunday 2 pm to 10 pm. In-depth research questions may be submitted to a research librarian via email or an electronically submitted Research Request form. Research librarians provide detailed advice on research strategies, database suggestions, referrals to relevant references sources and assistance navigating the library's website. Librarians typically respond to all requests within two business days.
  - ✓ Web Document Delivery (WDD): This method provides requested materials directly to the requesting student by posting them on the web, rather than mailing or emailing them. When a student requests certain types of documents owned by the Library, the Research Services Document Delivery Department scans the item into a PDF format, posts them on the web, and sends an email to the requesting student that contains the web link to the document. The posted document can be retrieved from any computer with web access.
  - ✓ One-on-one Library Instruction: Students may receive one-on-one instruction on any of the Library databases, the Library's online catalog, or research methods by emailing the Library to request an appointment.
  - ✓ Library Basic Training Online Course: This tutorial is designed to provide students with a Library instruction opportunity similar to face-to-face classroom instruction. The online course introduces students to Library services, teaches them how to use the Library's catalog EAGLEsearch, demonstrates how to access databases and provides steps for requesting items from the Hunt Library.
  - ✓ Research Help Guides: These guides recommend research resources such as databases, journals, books, and web pages, as well as providing information about locating information that is specific to a course, an assignment, a general topic, or a specific subject. Currently available Guides include three assignment guides, 26 course guides, 22 "how-to" guides, and 57 subject guides. Students may also request that the Library create a new research guide.
  - ✓ The Hunt Library's Evaluating Sources: This tutorial is designed to familiarize students with criteria that should be used to determine the credibility and reliability of sources used in the research process.

*Curriculum Evaluation and Development:* ERAU maintains an Academic Change Process for Substantive Changes that outlines the means of coordinating curriculum change proposals for all campuses of the University. These guidelines are to be used for substantive changes to the curriculum. Substantive changes are defined as additions or deletions of degree programs, minors, areas of specialization or tracks; a change that affects another campus; a change that affects the delivery of courses, student enrollments, credit hours, or completion of a program at any campus; a change that requires additional resources (e.g., faculty hires, library resources, staff requirements, or facilities); a change that significantly affects student learning outcomes; a change in status with the accrediting agencies of any program; or a change that requires Board of Trustee review and approval. The general workflow for substantive change proposals is as follows:

- Initiator of the Academic Change
- Campus Process – Library, Records and Registration, Institutional Effectiveness, Department Chair, Department Curriculum Committee, College Curriculum Committee, College Dean, Campus Curriculum Committee, Graduate Studies Committee (if applicable), Faculty Senate, and for the Worldwide Campus, the Chancellor
- Chief Academic Officer
- President
- Board of Trustee Review and Approval
- Accrediting Agency
- President's Cabinet for budget implications in cases when proposals require additional resources

*Student Complaints Process:* Students are encouraged to first address any issues with the faculty or staff member for which the grievance is based. If unresolved, the student should complete the Grievance (Complaint) form <https://crm.orionondemand.com/crm/forms/l7875ql7B0420x6702A75>. The Student Affairs Office will review the grievance and ensure that it is forwarded to the appropriate University department or college if necessary for review and action. The University department or college will communicate its decision or recommended action to the Student Affairs Office. The Student Affairs Office will communicate with the student and provide further guidance if appropriate.

At any time, students may contact the ERAU Worldwide Student Ombudsman to gain advice and specific direction in seeking a resolution. The Ombudsman is available to students to:

- Discuss any University-related issue.
- Determine what attempts have already been made to resolve the issue.
- Listen, clarify issues and offer assistance in defining options.
- Define University policies and procedures.
- Refer students to the appropriate student services within the campus such as local campus staff, Admissions, Financial Aid, Veterans' Affairs, Student Affairs, or Career Services.
- Define and offer options for resolution (it is the student's responsibility to take action).
- Identify and report trends, while maintaining the confidentiality of individual communications.
- The Ombudsman may also make recommendations to the appropriate University authorities about changes to University policy and procedures.

There are circumstances when the Student Ombudsman does not get involved. These include:

- When a student wants legal advice or legal representation. The Ombudsman can advise a student of his or her rights within the University, but will not provide legal advice or represent a student in a legal matter.
- When a student has a disagreement or problem that is not related to the University.
- When a student wants representation in a University grievance procedure. The Ombudsman will discuss the process and clarify the options available to the student before and after the proceedings.

Communication with the Ombudsman is confidential unless permission is granted from the student or the Ombudsman feels there appears to be imminent risk of serious harm to the student or others. For additional information, students may visit the Embry-Riddle Network for Information Exchange (ERNIE) at [ernie.erau.edu](http://ernie.erau.edu).

The ERAU student grievance procedure and the role of the Student Ombudsman are explained to students in the University's Worldwide Catalog at <http://catalog.erau.edu/pdf/2014-15-worldwide.pdf>.

### **Distance Education Programs Offered In Iowa**

The total, estimated cost of civilian tuition, fees, books and supplies for each program is listed below. ERAU provides tuition discounts for military personnel that are not reflected in the estimated total program costs below.

#### *Undergraduate Certificate Programs*

- Aviation Maintenance Technology: \$7,184
- Information Assurance (National Security Agency): \$4,169

#### *Associate Degree Programs*

- Associate of Science in Aeronautics: \$23,515
- Associate of Science in Aviation Business Administration: \$23,515
- Associate of Science in Aviation Maintenance: \$23,515
- Associate of Science in Technical Management: \$23,515

#### *Baccalaureate Degree Programs*

- Bachelor of Science in Transportation: \$46,845

#### *Master's Degree Programs*

- Master of Aeronautical Science: \$22,469 - \$24,153
- Master of Business Administration in Aviation: \$22,469
- Master of Science in Aviation Finance: \$22,469
- Master of Science in Engineering Management: \$22,469

- Master of Science in Information Security and Assurance: \$20,160
- Master of Science in Leadership: \$22,469
- Master of Science in Logistics & Supply Chain Management: \$22,469
- Master of Science in Management: \$22,469
- Master of Science in Management Information Systems: \$22,469
- Master of Science in Occupational Safety Management: \$22,469
- Master of Science in Project Management: \$22,469
- Master of Science in Unmanned Systems: \$22,469
- Master of Systems Engineering: \$22,469

## Registration Compliance

As required by Iowa Code Section 261B.4, ERAU disclosed its institutional policy for refunding tuition charges to students who withdraw from its programs. Iowa registration law and rule do not govern the University's tuition refund policy because it is not a for-profit institution.

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 complies with the requirements of Iowa Code Section 261.9(1)(e) and (f), and discloses these policies to students in various locations and documents posted on its website. It should be noted that while several of these documents are posted on the website for the Daytona Beach campus, the applicable policies explicitly state that they apply to University students and employees at all ERAU locations.
  - ✓ <http://daytonabeach.erau.edu/Assets/daytonabeach/forms/sexual-harrassment-and-misconduct-policies-procedures-and-victim-rights-2014.pdf>.
  - ✓ <http://daytonabeach.erau.edu/Assets/daytonabeach/forms/substance-abuse-appm.pdf>.
  - ✓ <http://daytonabeach.erau.edu/Assets/daytonabeach/forms/Sexual-Harassment-and-Sexual-Assault-Policy.pdf>.
  - ✓ <http://daytonabeach.erau.edu/about/safety/reports-procedures/index.html>.
  - ✓ <http://daytonabeach.erau.edu/Assets/daytonabeach/forms/where-do-i-get-help.pdf>.
  - ✓ <http://daytonabeach.erau.edu/about/counseling/index.html>.
- 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 application review process, the University adopted this policy and

discloses it to students on its state authorization page at <http://worldwide.erau.edu/locations/state-authorization/>.

- 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 requiring employees, who in the course of their employment, attend, examine, counsel, or treat a child to immediately report suspects incidents of child physical and sexual abuse to law enforcement and to the school. By cross-reference to existing administrative rules for registration [283-21.2(261B), subsection 7], this policy applies to schools that offer distance education programs and that have Iowa-resident employees or contractors (including online program faculty). During the registration application review process, the University modified its Sexual Harassment and Sexual Assault policy to apply these provisions to all University employees. The University provided staff with a copy of the revised University Policy 8.3.4 dated January 8, 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 a school to disclose to students information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. These disclosures are duplicative of the federal Department of Education's student consumer information disclosure requirements for a school that participates in the federal student aid programs and the University discloses them in its Worldwide catalog at <http://catalog.erau.edu/worldwide/>.

ERAU 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 provide this information to Iowa-resident students on its state authorization page at <http://worldwide.erau.edu/locations/state-authorization/>.

*Financial Responsibility:* ERAU submitted a copy of an independent audit conducted by BDO USA, LLP, certified public accountants, dated October 8, 2012 for the institutional fiscal years ending June 30, 2012 and 2011. The auditing firm expressed its opinion that the financial statements of the University present fairly, in all material respects, the financial position of the University.

- A private non-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. The most recent composite score for ERAU reported by the federal Department of Education is for the institutional fiscal year ending June 30, 2012: 3.0 (out of a possible 3.0).
- The institution is not required to calculate the percentage of its revenue derived from federal student aid funds since it is not a for-profit institution.

*Full-Time Iowa Resident Faculty Member or Program Coordinator:* Administrative rules effective January 15, 2014, no longer require a school to employ a full-time, Iowa-based faculty member or program coordinator if it applies for authorization to offer only distance education programs. However, ERAU employs four part-time instructors who teach in its online programs remotely from an Iowa location:

- James W. Cliber – Instructor, College of Arts and Sciences; Master of Education.
- Keith M. Fontano – Instructor, College of Business; Master of Science
- Bernard S. McCaffrey – Instructor, College of Aeronautics; Master of Aeronautical Science
- Billi J. Gordy – Instructor, College of Business; Master of Arts

*Instructional/Supervisory Staff Qualifications:* The University provided the names, general program area and highest degree attained for approximately 2,836 full- and part-time professors and instructors in its degree programs. Approximately 5% of the University's Worldwide faculty are full time. ERAU reports that full-time, campus-based faculty also provide supervision for part-time faculty teaching in ERAU's online programs. ERAU discloses the number of full-time and part-time faculty for 2013-2014 on its website at <http://news.erau.edu/media-resources/facts-figures/faculty-staff/index.html>. Including faculty at its campuses in Daytona Beach, FL, and Prescott, Arizona, as well as those that teach in the University's Worldwide instructional sites and online programs, the University has a total of 570 full-time faculty members as compared to a total of 3,351 part-time faculty members.

Review of the educational credentials of ERAU Worldwide faculty reveals the following:

- Approximately 864 faculty have terminal degrees, including 121 faculty members with a juris doctorate; 70 faculty members with a doctoral degree in education; 104 faculty members with a doctoral degree in business administration, management, or public administration; and six medical doctors.
- An additional six faculty members hold post-graduate degrees in education.
- Approximately 1914 faculty members have a master's degree, including 556 with a master's degree in aeronautical science; 348 with a master of business administration or public administration; and 44 with a master's degree in education.
- In addition to educational credentials, ERAU lists professional credentials for approximately 45 faculty members that include airline transport pilot, commercial pilot, advanced ground instructor, aircraft dispatcher, and airframe and powerplant mechanic.

ERAU maintains the Bruce A. Rothwell Center for Teaching and Learning Excellence <http://sites.erau.edu/erauctleww/about-us/> which was created in 2005 under the advisement of the Faculty Senate in order to enhance faculty learning. The Center serves all full- and part-time ERAU Worldwide campus (including online program) faculty by providing opportunities to improve teaching skills and showcase best teaching practices in the classroom.

All instructors must complete certain introductory courses that cover the responsibilities of ERAU instructors, the University's course management system, best practices for course preparation and delivery, and that provide a perspective for teaching in aerospace and military environments. Instructors must also complete courses that are specific to the modality in which they will teach. Online instructors learn about best practices in online learning, student-centered approaches to teaching, and instructional applications of web-based tools for collaboration. The Center also offers mandatory courses that introduce faculty to the University-wide IGNITE Quality

Enhancement Plan. Faculty receive an overview of inquiry-based teaching and learning, and learn about research techniques and practices that inform pedagogical, in-class teaching practices from the smallest unit, such as an in-class learning activity.

*Commitment to Iowa Students and Teach-Out:* The ERAU registration application includes a letter from President and CEO John P. Johnson, Ph.D., affirming the University's commitment to providing its distance education programs to Iowa residents. If at a future time the University is unable to continue a program, Dr. Johnson states that ERAU will submit a teach-out plan to its accrediting agency, the Southern Association of Colleges and Schools – Commission on Colleges, which ensures all students that began the program can complete the program with ERAU.

*Student Complaints:* None.

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

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

ERAU is exempt from filing evidence of financial responsibility as a college or university authorized by the laws of Iowa or any other state or foreign country to grant degrees [Iowa Code Section 714.19, subsection 1]. ERAU was authorized, by name, to grant degrees in the State of Florida by an Act of the 2011 Florida Legislature documented in Florida Senate Memorial 1654.

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

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