

IOWA COLLEGE STUDENT AID COMMISSION

Ross College Application for Postsecondary Registration January 31, 2017

STAFF ACTION: Approve Ross College's initial application for registration in Iowa for a two-year period that begins on January 31, 2017 (the date that Ross Education, LLC acquired the former Iowa school Brown Mackie College – Quad Cities) through January 31, 2019.

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.

Staff required Ross Education, LLC (Ross Education) to register in Iowa in order to maintain operation of the school formerly known as Brown Mackie College - Quad Cities in Bettendorf, Iowa, upon the acquisition of the school by Ross Education on January 31, 2017. Going forward, Ross Education will call the school Ross College (the College).

While Ross Education maintains an online division, Ross Online, no fully online programs will be offered to Iowa residents at this time.

Institutional Information

Ross College is a private, for-profit educational institution whose campus is located at 2119 E. Kimberly Road, Bettendorf, Iowa. The Iowa contact person is Campus President Jennifer Opp-Jackson at the same business address. Ross College is registered with the Iowa Secretary of State's office under the name of its parent company, Ross Education, as a foreign limited liability company #525200. The Iowa registered agent for Ross Education is CT Corporation System, 400 E. Court Ave., Des Moines, IA 50309.

Current Ownership and Governance: Ross College is owned and governed by Ross Education, a privately-held, for-profit educational corporation located at 22800 Hall Road, Suite 800, Clinton Township, MI 48036. The sole owner of Ross Education is Ross Education Holdings. The Chief Executive Officer of Ross Education is George Grayeb at 1188 East Paris SE, Grand Rapids, MI 49546-8331, where Ross Education maintains its general corporate offices.

The legal governing body of Ross Education is comprised of the following individuals:

- George Grayeb – Chief Executive Officer and President. Mr. Grayeb holds a masters degree from the University of Denver and has approximately 14 years experience in

- management or executive leadership roles at other for-profit postsecondary educational corporations, including experience as a health education strategist.
- Anthony (Tony) Iaquinto – Chief Financial Officer, Treasurer and Secretary. Mr. Iaquinto holds a Bachelor of Science in Business Administration from Wayne State University and is a Certified Public Accountant. He has approximately 16 years of experience in executive leadership roles at for-profit, postsecondary educational corporations.
 - Kiely Fletcher – Executive Vice President, Student Finance & Regulatory Affairs. Ms. Fletcher holds a masters degree from Ohio State University and has over 16 years of experience in higher education administration and management within the public and for-profit sectors.
 - Greg Brenner – Chief Information Officer. Mr. Brenner holds a Bachelor Degree in Information Technology from Baker College and has approximately 20 years of experience in IT management, support, and design. Mr. Brenner has been working for for-profit, postsecondary educational institutions for 17 years.
 - Sharon Treumuth – Executive Vice President, Operations. Mrs. Treumuth holds a Bachelor Degree in Human Resources from Concordia University. She has 24 years of experience in management or executive leadership roles with Ross Education. Her previous experience with Ross Education includes a role in career services, and appointments as a Campus Director and Regional Vice President.
 - Shaun Fracassi – Executive Vice President, Career Services. Ms. Fracassi holds an associate degree and has over 25 years of experience in sales and service leadership. Prior to joining Ross in 2011, Ms. Fracassi served as the Senior Vice President and General Manager for a Fortune 500 staffing firm. She has extensive leadership experience and specializes in growth, turnaround, and integration of placement service operations.
 - Shibu Thomas – Executive Vice President, Admissions and Marketing. Mr. Thomas holds a Masters Degree in Business Administration from Benedictine University and has approximately 18 years of leadership and management experience in postsecondary education.

Additional Ross Education management personnel include the following. These individuals have various operational, compliance, and academic roles in the management of Ross Education's campuses, including Ross College in Iowa:

- Dave Fowler – Vice President of Administrative Services
- Wendy Kandel – Vice President of Compliance
- Kelly Byrnes – Regional Vice President
- Sherry Feltson – Regional Vice President
- Mark Forsythe – Regional Vice President
- Kris Furtaw – Regional Vice President
- Ryan Middleton – Regional Vice President
- Eric Stoneking – Regional Vice President
- Kelly Graft – Regional Vice President of Admissions
- Allison McConnell – Regional Vice President of Admissions
- Don Klobucar – Director of New Campus Development
- Kara Killeen Look – Director of Ross Online
- Sharon Smith – Director of Education

- Kim Zwierzchowski – Director of Corporate Financial Aid

Staff requested and received information about persons at the College who make academic decisions on a national level that impact Ross College's programs, including those offered at the College's Iowa campus. The Ross Education corporate Director of Education, Ms. Sharon Smith, is responsible for determining the length, course sequence, and method of instructional delivery for all programs. Ms. Smith began her tenure at Ross Education in February of 2012, and came to the organization with a strong background in postsecondary allied health education. Previously, Ms. Smith was the Director of Education for a postsecondary institution in Michigan. Prior to that she served as a division manager for student retention and supported multiple schools within another for-profit, postsecondary educational system. Ms. Smith holds a Masters Degree in Educational Leadership and a Bachelor Degree in Health Studies from Western Michigan University. She obtained her Associate Degree in Allied Health from Ferris State University.

Ms. Smith is supported by subject matter experts, called Program Chairs, on the national level in each respective program discipline. The national Program Chair for the Medical Assistant and Medical Insurance Billing and Office Administration Diploma Programs is Barbara Westrick, CMA, CPC. Ms. Westrick is responsible for overseeing the design, development, and assessment of program curricula and supporting the campuses in the hiring, training, mentoring, and evaluation of instructors for these two programs. Ms. Westrick holds an Associate Degree in Medical Secretary from St. Clair Community College and a Medical Assistant Certificate from Schoolcraft College. Ms. Westrick worked as a Certified Medical Assistant, billing specialist practitioner, and educator for a number of years.

Ross College will accept new enrollment in three programs that were offered by the former Brown Mackie College – Quad Cities, but that are new to Ross College: the Associate of Science/Occupational Therapy Assistant, the Associate of Science in Information Technology, and the Associate of Science in Business Management. Since Ross College has added these new fields to its program portfolio, the College will obtain additional subject matter experts to provide input to the curriculum as needed.

Also see below, under "Curriculum Evaluation and Development," for additional information about the College's academic leadership and their roles.

Physical Facilities: Ross College provided a copy of the current lease for the Iowa campus executed between the landlord and the former tenant Brown Mackie College – Quad Cities, and included a sketch of the interior facilities. The campus comprises approximately 30,000 square feet of space. Approximately 13,928 square feet is designated for classroom use, including four computer lab rooms, 13 lecture rooms and two clinical lab rooms. The remainder of the space consists of library facilities, offices, a lounge for faculty and students, restroom facilities, and other common public spaces. Year-round, 24/7 access to parking in the amount of eight spaces per 1,000 square feet of rented space is guaranteed as part of the lease. EDMC and Ross Education have executed a signed Assignment and Assumption of Lease in which Ross Education assumes all responsibilities under the lease for the campus facility as of the date of sale, January 31, 2017. Staff is advised that a new lease between the landlord and Ross Education will not be executed until the current lease expires in November of 2019.

Accreditation: The Accrediting Bureau of Health Education Schools (ABHES) approved Ross Education to operate the Ross College campus in Bettendorf, Iowa as a branch campus of a main campus located in Brighton, Michigan. ABHES is a national accrediting agency recognized by the federal Department of Education for the accreditation of allied health education institutions and institutions that offer predominantly allied health programs.

Ross College also maintains special programmatic accreditation by the Accreditation Council for Occupational Therapy Education (ACOTE) for the College's Occupational Therapy Assistant program. This accreditation was in place at the time Ross Education acquired the former Brown Mackie College – Quad Cities. Under ACOTE rules, Ross College must submit an application for accreditation within 30 days of the date it acquired the Iowa campus. The application must include details of the change, the impact on the occupational therapy assistant program, and the regional or national accreditation status of Ross College in Iowa. ACOTE will conduct a review of the notice and advise the College if any additional information is required. There is no separate accreditation action necessary for such a change if the program remains within the current facility with no change in resources or delivery model. The College has no plans to make such changes.

ACOTE accreditation is a requirement of the Iowa Board of Physical and Occupational Therapy for an educational program that prepares students for employment as an occupational therapy assistant in Iowa. Ross College is one of only four schools in Iowa that has an ACOTE-accredited Occupational Therapy Assistant Program. As of September 22, 2016, 25% of the College's students were enrolled in this program.

Federal Stafford Loan Cohort Default Rate (FFY 2013): The College's Iowa campus is considered by its accrediting agency ABHES and the federal Department of Education to be a branch campus of Ross Medical Education Center located in Brighton, Michigan. The Stafford loan cohort default rate at the main campus in Brighton, Michigan is 20.7%. Going forward, federal Stafford loan defaults attributable to former students at Ross College in Iowa will be included in the default rate calculated for the Brighton, Michigan main campus.

For comparison purposes, the FFY 2013 three-year national average default rate of all schools is 11.3%.

Graduation Rate: This is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion as reported to the federal Department of Education. Graduation rates for all campuses of Ross College and Ross Medical Education Center, which is also owned by Ross Education, are as follows:

- Ann Arbor, MI: 82%
- Bowling Green, OH: 77%
- Brighton, MI: 89%
- Canton, OH:: 90%
- Charleston, WV: 71%
- Cincinnati, OH: 79%
- Davison, MI: 85%
- Dayton, OH: 73%
- Flint, MI: 86%

- Fort Wayne, IN: 90%
- Granger, IN: 89%
- Kentwood, MI: 85%
- Kokomo, IN: 65%
- Lansing, MI: 81%
- Madison Heights, MI: 80%
- Morgantown, WV: 76%
- New Baltimore, MI: 87%
- Niles, OH: 78%
- Ontario, OH: 65%
- Port Huron, MI: 80%
- Portage, MI: 78%
- Roosevelt Park, MI: 82%
- Saginaw, MI: 84%
- Sylvania, OH: 81%
- Taylor, MI: 93%

Average Loan Debt upon Graduation: According to historical data for the former Brown-Mackie – Quad Cities campus, the average loan debt for students that attended associate degree programs is approximately \$24,000. For students that attended diploma programs, the average loan debt is \$15,500.

Record Preservation: Ross College believes that data redundancy is the best data protection. Consequently, critical data is stored electronically and backed up regularly on reliable media that are kept in a secure, off-site location.

To achieve successful, comprehensive data archival, Ross College follows the general principal that if losing data will interfere with doing business, the data should be archived. Thus, the College regularly identifies and archives the following categories of critical data using systems that the College leases:

- Student data
- Distance education delivery
- Financial data
- Employee data

Historical documents and original, hard copy documents that must be retained are stored at a secure, off-site location.

Student data: Ross College maintains all student records electronically in CampusVue, an electronic database maintained and managed by Campus Management Corp. (CMC). This is a widely used platform for housing data among postsecondary educational institutions. CampusNet Cloud Services, which includes Campus Vue, permits Ross College to accommodate rapid growth and change while easing the administrative burden and expense of managing software and infrastructure.

Once weekly, CMC performs a complete archive of Ross College data using standard industry backup procedures. CMC maintains this data at CMC's colocation center. In

addition, CMC performs daily incremental backups and stores and maintains such data according to industry standards. On a monthly basis, CMC makes a copy of CampusVue data and stores it at a secure off-site location.

Distance education: Ross College offers fully and hybrid distance education programs and courses using Instructure Inc.'s Canvas software as the host. Instructure, Inc. handles all backups, security, and required updates. To protect against malicious or accidental data destruction, Canvas stores data redundantly and employs soft-deletions. Administrators and instructors can recover previous versions of the grade book, content pages, and assignment submissions. Instructure, Inc. maintains versions of all Canvas data and content by taking a series of periodic snapshots of databases. Snapshots of databases are taken daily, and each daily snapshot is retained for a week. Weekly snapshots are taken and retained for a month. Monthly snapshots are taken and retained for a year. Database transaction logs allow point-in-time restoration with a ten minute resolution.

Financial data: Ross College's general ledger (student account) system is Solomon, a financial account software supported by Microsoft. The financial data is backed up nightly by Ross College via Veeam Backup, which permits encryption of all data at the source, offers state of the art back-up processes, facilitates complete visibility of stored data to the user, and allows data or file recovery at any time.

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

Jillian Troy
22800 Hall Rd., Suite 800
Clinton Township, MI 48036
(810) 740-1019
<https://www.rosseducation.edu/transcripts/>

Instructional Methodology: The programs Ross College acquired from the former Brown Mackie College – Quad Cities offer courses using two delivery modes. A student may be enrolled and admitted to a class using a purely face-to-face instructional method or a modality that blends face-to-face instruction with online delivery for up to 50% of the course. The online learning content for such a course supports the educational learning objectives and outcomes for the program and the credential awarded. The outcomes and objectives for the online portion of the course mirror the course content delivered in the classroom.

All programs are delivered through a variety of teaching methodologies, which include lecture, laboratory, demonstration and hands-on practice, clinical proficiencies, and on-the-job experience. In the lecture component of the classroom, students receive the theory and appropriate background information essential to the skills being taught. In the laboratory component, there is a combination of classroom instruction and practical application represented by presentation, practice, and skill proficiency demonstration. Students in all allied health programs are required to complete an externship at a local facility or organization as a means of applying competency skills to a real world setting.

The small class sizes, up to 24 students, allow the students to receive individual attention when needed, but also allow the students to progress at their own pace in certain subjects. While there are no remedial or advanced classes offered, instructors are expected to offer

support and additional help in order to assist the students who are having academic difficulties. For advanced students, a Resource Manual was developed to aid the instructors in providing extra assignments designed to challenge these learners.

Detailed course syllabi for each course within the program are maintained in curriculum binders at the school. Instructors follow a standardized curriculum with specific daily lesson plans.

Grades are determined according to a point system. Points are assigned for each criterion previously established for the purpose of evaluating each assignment. Each graded assignment, project, quiz, exam, and discussion question criterion is assigned a point value, which reflects the quality of the student's contribution. In most instances, there will be at least two distinct criteria specified for evaluation and grading of the student's work. Students will receive progress and grade reports at assigned intervals.

With the student's authorization, a new student may access electronic textbooks through the use of an electronic tablet. These students receive their device during the third week of the first course. The cost of the tablet and a technology kit is eligible for payment by federal student aid. Students who choose to decline the College's device must supply their own compatible device no later than week three of the first course. Instructors provide all materials for the first two weeks of the first course.

In the online learning environment, active student participation is achieved when students post notes and respond to the notes of others that may relate to the lecture and assigned readings; when students answer and respond to the answers of other students about assigned discussion questions; when students post evaluations of case studies and responses to other specific assignments. A "response" may be a question or critique about another's work; an agreement with or challenge to the point of view expressed by the instructor or another student which is supported by a reference to a textbook, lecture, or personal experience (not mere opinion); or a citation to a reference that is relevant to the topic. Students are required to read all of the instructor's and fellow students' notes. The quantity and quality of the student's participation will be graded. Students are strongly encouraged to participate throughout the week, including weekends.

Each campus is supplied with audio-visual equipment, anatomy and physiology charts, and array of educational videos and DVDs. Learning modes vary according to the program. Instructors may employ DVD players, LCD projectors, transparencies, and models.

Instructor observations are completed to help ensure a variety of strategies are regularly used in the classroom. Further, each program instructor is required to complete Master Teacher Online training (which is part of Elsevier–Evolve). The Master Teacher Development Process was devised by experts with knowledge of the issues and challenges faced by faculty. It consists of five (5) modules which cover essential elements of effective teaching. In addition to this training, all instructors must complete two in-service activities in each 12-month period. These activities are essential to the improvement of faculty teaching skills.

Student Learning Resources: The Ross College Campus Library is open as follows:
Monday: 8:00am – 9:50 pm

Tuesday: 8:00 am – 9:50 pm
Wednesday: 8:00 am - 8:00 pm
Thursday: 8:00 am – 9:50 pm
Friday: 8:00 am - 5:00 pm
Saturday 9:00 am – 1:00 pm

As of the date of this report, the position of Campus Librarian is vacant, but the College plans to hire a person to fill this vacancy. A typical Ross College Campus Librarian's hours are 8 am to 5 pm, with coverage after 5pm by support staff who are trained in the use of technologies and resources available in the Library.

The College maintains a Library of curriculum-related resources at the campus. Technical and general education materials, academic and professional periodicals, and audio-visual resources are available to both students and faculty. Faculty members make regular assignments that require use of the Library, and students are encouraged to become familiar with the available resources as early as possible. The Library also provides students with a quiet and pleasant environment for study and recreational reading. The Library's collection contains approximately 3,500 print volumes related to general education and the professional fields studied by students at the College. The Library also subscribes to 22 print periodicals.

Students are also expected to use resources at local libraries. Internet access is available on campus for research. In addition, Ross College maintains an annual contract for students to utilize Gale Cengage Learning's Virtual Library (Academic One File), which can be accessed 24/7 from any location. Many Gale Virtual Library resources are cross-searchable using the search platform PowerSearch. The Gale PowerSearch platform offers comprehensive access to authoritative reference, periodical and primary source information. Resources available through the Virtual Library include databases, books, academic journals, magazines, newspapers, images, videos, and podcasts. There are more than 6,000 full text materials available through the Virtual Library and more than 14,000 titles, including more than 9,000 peer-reviewed journals.

Students are oriented to the Virtual Library early in their curricula. Instructors must know how to use the Virtual Library resources so they can assist students. Instructors will log into the Virtual Library on the first day of class in every course module. This activity is included in the instructor's documented lesson plan.

In order to have adequate knowledge of and familiarity with the Virtual Library, every instructor completes a webinar with the students, which provides a guided tour of the Virtual Library. Instructors are available to provide assistance to students in the use of the Virtual Library on an ongoing basis. Ross College can monitor the extent to which instructors and students are accessing Virtual Library resources through periodic reports provided by Gale Cengage Learning that detail Virtual Library usage at the campus.

Tutoring - each instructor schedules weekly office hours in order to be available for tutoring of students or for classroom preparation. Tutoring and academic guidance are provided to students when needed. Students may receive extra help by requesting assistance from their instructor or other administration personnel. Tutoring will be arranged outside the normal classroom instruction hours to assist the student.

The Career Services Department assist graduates in entering careers in their fields of education and training. The curriculum in each program incorporates resume writing and other employment related activity (e.g., mock interviews) to assist students before graduation. The Career Services staff also works with students prior to graduation to determine areas of employment interest and to explore employment options. Students are notified of appropriate opportunities as these occur. Although Ross College does not guarantee employment to any graduate, onsite Career Services staff work to provide employment leads and to help graduates obtain interviews for appropriate employment. Students may request assistance with preparing resumes, cover letters, and employment applications. Students may also contact Career Services for help obtaining part-time employment. Career Services assists in arranging interviews between employers and students when employment opportunities occur. Students are then expected to take the initiative in pursuing the employment process.

Curriculum Evaluation and Development: Input regarding the curriculum for each program is provided to the national Program Chairs and the national Director of Education by the campus Advisory Board, faculty members, and campus leadership and through comments and suggestions received from students, graduates, externship sites, and employers via respective survey instruments. The content of the programs, equipment used for instruction in the respective programs, required textbooks and other instructional materials, and trends in the occupational field are also evaluated through regular curriculum meetings.

Ross College submitted sample faculty meeting agendas that include the following standard topics related to curriculum evaluation:

- Recent survey results from students, graduates, employers, externship sites regarding satisfaction rates, comments, and any needed action plans
- Recent Advisory Board meeting discussions, conclusions, actions, recommendations and responses to recommendations
- Program assessment examination/evaluation results, analysis, resulting instructional or program changes
- Curriculum Review Committee actions, updates, revisions or changes
- Instructional resources and materials
- Learning resources such as reference, research and other information resources
- Equipment and supplies
- Student academic progress concerns and remedies
- Classroom observations and evaluations.

Ross College maintains campus-based advisory boards for each major program area which meet annually in October. The campus advisory boards often consist of local employers who have hired campus graduates and/or persons employed by organizations that supervise the College's students during an externship experience. For certain programs, the advisory board membership must include persons with specific professional credentials. For example, the Medical Assistant Program Advisory Board must include a U.S. licensed physician, physician assistance or nurse practitioner.

The members of the campus advisory boards meet in a general session to discuss all programs, and then break out into program-specific sessions to focus on individual or related programs. Campus faculty and staff participate in advisory board meetings. The

College submitted a standard agenda for Advisory Board meetings that includes the following topics for discussion:

- Program curriculum, objectives, content and length
- Adequacy of facilities and equipment
- Program retention and placement rates
- Results of credentialing examinations for the program
- Student, graduate and employer survey results for the program; suggestions and action plans for the program
- Program assessment evaluation results, analysis, and any changes implemented
- Evaluation of program effectiveness plan
- Current and projected needs for graduates in the field
- Program strengths and weaknesses in preparing graduates
- Question and Answer/Open Discussion.

The national Program Chairs and the Director of On-Ground Education glean valuable information regarding employment trends and technological updates from professional publications and publisher representatives, and this information is also used to structure curricula appropriately. From all resources, new or revised competencies may be developed and class schedules fashioned into sequences of instruction that bring about a development of defined competencies and the knowledge, practical, and soft skills sets necessary to demonstrate those competencies.

Each Ross College Campus Director annually coordinates a curriculum evaluation process, which Ross College calls the Program Effectiveness Plan (PEP). The PEP is a systematic and ongoing, documented process to implement continuous improvement, determine internal effectiveness, assess progress and change, communicate outcomes, and demonstrate regulatory compliance. This is accomplished by collecting, analyzing, and acting on data. The College submitted a detailed, sample PEP that outlines learning and occupational objectives of a program, and focuses specifically on how those objectives are being met through student and graduate surveys, externship site surveys, employer surveys, advisory board program reviews, student competency evaluations, and statistical data such as retention and job placement rates. Ross College Career Services team tracks placement data by verifying placement directly with an employer.

Student Complaints Process: The College discloses its Process for Expressing Concerns on the Ross Education webpage at <https://www.rosseducation.edu/about-ross/accreditation/> and in its Student Guidelines document which is available on each Ross College campus homepage.

Ross College encourages all students to bring any concerns to the attention of faculty of the Campus Director in order to have them addressed. However, if a student does not feel that his or her concerns were satisfactorily addressed, Ross College provides the following formal procedures for addressing a concern.

Students must first meet with the Campus Director in an effort to address the concern. If the issue has not been resolved, the student should direct a written complaint to the Ross College parent company, Ross Education, at the following address:

Ross Education, LLC

Concern Resolution Department
Attention: Ms. Kathleen Brown
300 S. Riverside, Suite A
St. Clair, MI 48079

Ross Education will acknowledge receipt of a student's written complaint within three working days. Ross Education will follow up with a written response within 10 working days. If the Ross Education response still does not rectify the concern, a student may request to arrange a meeting between the concerned parties.

A student who believes that his or her complaint remains unsatisfactorily resolved may refer the complaint to the Iowa College Student Aid Commission.

Programs Offered In Iowa

Ross College offers the following programs at its Iowa location. Total estimated tuition charges, fees, books, supplies, and other costs payable to the school by a student are provided for each program.

Diploma Programs

- *Medical Assistant - \$15,740
- *Medical Insurance Billing and Office Administration: \$15,740

Associate Degree Programs

- Associate of Science in Business Management - \$32,330
- Associate of Science in Business Management/Project Management - \$32,330
- Associate of Science in Information Technology - \$32,330
- *Associate of Applied Science/Occupational Therapy Assistant - \$39,626

Ross College will *not* accept new enrollment in the following programs offered by the former Brown Mackie College – Quad Cities, and will teach out students that are currently enrolled in these programs:

- Associate of Science in Criminal Justice
- Associate of Science in Health Care Administration
- Medical Assistant Diploma (Note: This version of the program was offered by the former Brown Mackie College – Quad Cities. Ross College will replace it with a diploma program that includes modified curriculum at a lesser cost.)

**Field Experiences*

- Associate of Applied Science/Occupational Therapy Assistant – Students participate in two, separate practical experiences in this program:
 - ✓ A field experience consisting of a minimum of 30 hours, or approximately 8 am to 5 pm during one week, observing at a local occupational therapy service or clinic. Students must observe and record information on treatment sessions with patients. Students are encouraged to ask questions and converse with the clinical instructor regarding treatment.
 - ✓ A field experience consisting of a total of no less than 600 clock hours during four fieldwork courses under the instruction and direct supervision of a clinical instructor. During this experience students participate in the direct treatment of

psychosocial and physical dysfunction. Fieldwork must be completed during the day between the hours of 7 am to 8 pm or as required by the cooperating facility, averaging a minimum of 37.5 hours per week. Students are evaluated at the end of the fieldwork and are graded “passing” or “not passing.” A student that receives a grade of not passing at the end of any one of the field experiences must repeat all four fieldwork courses.

- Diploma in Medical Assistant and Diploma in Medical Insurance Billing and Office Administration – Every student completes a practical externship at the conclusion of the didactic portion of the program, which gives the students the opportunity to apply what they have learned to a real world setting. The externship also provides employers an opportunity to assess a student’s skills before hiring entry-level allied health professionals. Ross College identifies appropriate externship sites, makes a site visit, and approves the site before placing students at an externship site. In the Diploma in Medical Assistant Program, the externship consists of 168 clock hours of off-site practical experience. In the Diploma in Medical Insurance Billing and Office Administration, the externship consists of 110 hours of off-site practical experience.

Registration Compliance

As required by Iowa Code Section 261B.4, the College submitted a policy for refunding tuition charges to withdrawn students. Since Ross College is a for-profit institution, its tuition refund policy must comply with Iowa Code Section 714.23. Staff determined that the College’s policy is compliant and verified that it is disclosed 1) on the College’s Registration and Enrollment Agreement executed by new diploma-seeking students, and 2) on the separate Enrollment Agreement executed by new degree-seeking students. In addition, the College reiterates the Iowa tuition refund policy in a new Ross College Catalog for Iowa students, which will be posted to the Ross College website.

Administrative rules for registered schools specifically require a 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. Ross Education will disclose these policies in various resources, as follows:
 - ✓ A new Ross College Catalog for Iowa students, which will be posted to the Ross College website. This Catalog will include information about national counseling and prevention resources.
 - ✓ A Student Guidelines document that will be posted to the Ross College website.
 - ✓ An Anti-Drug packet that is distributed to campus-based students, which includes information about national counseling and prevention resources. A sample of this packet was provided with the Ross College registration application.
 - ✓ The Ross Education Emergency Management Plan, which is distributed to employees.
 - ✓ A Sexual Misconduct & Relations Violence Policy that a student is informed about in the Catalog, and may be requested from the Campus Director.

- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy for refunding tuition and mandatory fee charges to 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 College maintains a compliant policy and discloses this policy 1) on the Registration and Enrollment Agreement executed by new diploma-seeking students, and 2) on the separate Enrollment Agreement executed by new degree-seeking students. In addition, the College reiterates the Iowa tuition refund policy in the new Ross College Catalog for Iowa students, which will be posted to the Ross College website. A copy of this Catalog was provided to staff for review.
- Iowa Code Section 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. By cross-reference from existing administrative rules for registration [283-21.2(261B), subsection 7], this policy applies to Iowa's registered schools who compensate one or more parties to conduct instruction or other operational activities on the school's behalf at an Iowa location. Ross College maintains a compliant policy that is included in an Employee Handbook, which the College provided as an addendum to its registration application.

Student Consumer Information: In its registration application, the College affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. The College provides this information on 1) the College's Registration and Enrollment Agreement executed by new diploma-seeking students; 2) on the separate Enrollment Agreement executed by new degree-seeking students; 3) in a new Ross College Catalog for Iowa students that will be posted to the Ross College website; and 4) on its Gainful Employment disclosure webpage for each program.

The College affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7. These provisions of Iowa Code 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 disclose Commission contact information for students who have questions or complaints about the school. The College will disclose its Iowa registration and the Commission's contact information for the Iowa campus on its website at <https://www.rosseducation.edu/about-ross/accreditation/> and in the Ross College Catalog at <https://www.rosseducation.edu/catalogs-addenda/>.

Financial Responsibility: Ross College provided a copy of an independent audit of its parent company, Ross Education, LLC, doing business as (dba) Ross Medical Education Center and Subsidiary, for the corporation's fiscal years ending June 30, 2015 and 2014, conducted by the independent auditing firm Ernst & Young, LLP. In a report dated September 30, 2015, the auditing firm expressed its opinion that the corporation's financial statements

presented fairly, in all material respects, the financial position of Ross Education and its subsidiaries.

- A nonpublic school that participates in the federal student aid programs must maintain a composite score, based on a three-factor financial responsibility ratio, of at least 1.5 in order to be determined financially responsible without additional oversight. The most recent composite score verified by the federal Department of Education for Ross is for the fiscal year ending June 30, 2014. The composite score at that time was 2.4 (out of a possible 3.0).
- A for-profit school that participates in the federal student aid programs must demonstrate that no more than 90% of its revenue is derived from Title IV funding (also known as a “90/10 ratio”). As previously discussed, the Ross College campus in Iowa will be a branch campus of a main campus located in Brighton, MI. Thus, going forward, the percentage of Title IV aid Ross College in Iowa derives will be included in the 90/10 ratio for the main campus at Brighton, MI. For the institutional fiscal year ending June 30, 2014, the 90/10 ratio for the Brighton, MI campus was 87.11%.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Ross College reports that there are six full-time faculty members at the Ross College campus in Iowa, in addition to the full-time Campus Director, Jennifer Opp.

Instructional Staff Qualifications: Staff reviewed approximately 31 summaries of educational credentials for faculty teaching in the programs offered at BMC - Quad Cities. It is important to note that the highest educational credential awarded by BMC - Quad Cities is an associate degree.

Of all profiles reviewed, staff noted three faculty members who had a baccalaureate degree. One of these individuals teaches in the diploma-level medical assisting program and has educational experience in that specific field, an associate degree in another allied health field, and a baccalaureate degree in accounting. Another faculty member with a baccalaureate degree teaches in the occupational therapy assistant program. She has a degree in occupational therapy and has been a licensed occupational therapist in Iowa for approximately 23 years. The third individual has a bachelor’s degree in business education and appears to be teaching lower level general education courses in the College’s associate degree programs.

The remaining faculty hold at least a master’s degree in fields such as mathematics, nutrition, criminal justice, biology, communications, forensic psychology, business, education, English, information architecture, accountancy, occupational therapy, organizational management, organizational leadership, computer science, health care administration, and performance arts. One of the faculty members with a master’s degree is working on his doctoral degree in organizational leadership. Eight faculty members have a doctoral degree in areas such as chiropractic medicine, osteopathic medicine, English, or law.

Commitment to Iowa Students and Teach-Out: By executing his signature on the application, Ross Education Chief Executive Officer George Grayeb commits to the delivery

of programs in Iowa, and agrees to provide alternatives for students to complete programs at the Ross College campus in Iowa or another school if Ross College closes a program or the campus closes.

Student Complaints: Not applicable. This is a new Iowa school.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Ross Education, doing business as Ross College filed satisfactory evidence of financial responsibility under Iowa Code Section 714.18, including a continuous corporate surety bond in the amount of \$50,000 payable to the State of Iowa and issued by Washington International Insurance Company.

Section 714.23 – State Tuition Refund Policy

Ross College maintains a compliant tuition refund policy for students who withdraw from its campus, and discloses that policy to students in its Registration and Enrollment Agreement executed by new enrollees in the College's diploma programs, and in a separate Enrollment Agreement executed by new degree-seeking students. In addition, the College reiterates the Iowa tuition refund policy in a new Ross College Catalog for Iowa students, which will be posted to the Ross College website.

Compliance with Iowa Code Chapter 261F

Preferred Lender List: Ross College does not maintain a preferred lender list and its financial aid staff make no lender referrals. In the College's Student Consumer Information Brochure, which provides financial aid related disclosures, Ross College states:

Be Wary of Private Loan Offers

Students are cautioned to be especially careful about unsolicited direct mail or email loan offers from banks. Students should also take care not to borrow excessively. It is especially important to check terms and conditions of loans offered. Many private loans are expensive and could negatively impact eligibility for federal student aid programs.

Student Loan Code of Conduct: The Ross College Student Consumer Information Brochure contains the College's Education Loan Code of Conduct. The Ross College Code of Conduct contemplates a financial aid officer's participation in a lender Advisory Board with the permission of Ross College. However, Iowa Code prohibits such participation in all cases. Staff received written assurance from Kiely Fletcher, Executive Vice President, Student Finance & Regulatory Affairs, that no approval would be granted for lender Advisory Board participation on the part of financial aid staff at Ross College in Iowa. Ross College states on its main webpage <https://www.rosseducation.edu> under a heading *Iowa Disclosures* that it maintains a Code of Conduct that governs the education loan activities of employees in compliance with Iowa Code Chapter 261F, and provides a live link to the Code of Conduct details <https://www.rosseducation.edu/wp-content/uploads/2012/12/2016-17-Ross-Consumer-Information-Brochure-Preferred-Lender-Issue.pdf>. This brochure is much more comprehensive and covers a much broader range of topics that the text of the link suggests.