

IOWA COLLEGE STUDENT AID COMMISSION

St. Luke's College Voluntary Application for Postsecondary Registration in Iowa May 6, 2016

STAFF ACTION:

Approve the voluntary application for postsecondary registration in Iowa for St. Luke's College for a two-year term that begins on May 6, 2016, and ends on May 6, 2018.

Registration Purpose

St. Luke's College (the College) lawfully operates a postsecondary, degree-granting institution in Iowa under an exemption from registration in Iowa Code Section 261B.11, subsection 1, paragraph "j": "Higher education institutions that meet the criteria established under section 261.9, subsection 1." The criteria referenced in Iowa Code Section 261.9, subsection 1, establish institutional eligibility for the Iowa Tuition Grant Program. The College meets the Iowa Tuition Grant Program institutional eligibility criteria. Whether an institution actually awards funds from this state grant program is irrelevant. Thus, the College is not required to seek the explicit approval of the State of Iowa in order to lawfully offer postsecondary degree programs in Iowa. For the purpose of the federal Department of Education's rules in 34 CFR 600.9 that require federal student aid participating schools to be authorized by an action of the State in which the school is located, St. Luke's College is listed in Iowa Administrative Code 281-Chapter 21, by name, as a private, nonprofit, degree-granting postsecondary educational institution that lawfully operates in Iowa.

However, the College has elected, voluntarily, to seek official designation by the Iowa College Student Aid Commission as a registered school under Iowa Code Chapter 261B and associated rules in Iowa Administrative Code 281-Chapter 21 that are in effect as of the date of this report.

Institutional Information

St. Luke's College is a nonprofit school located at 2720 Stone Park Boulevard, Sioux City, Iowa. The College also offers instruction in one of its programs on the campus of Dordt College in Sioux Center, Iowa. However, since the College teaches less than 50% of the courses required for the program at the Dordt College location, accrediting agency approval is not required.

The College's Chief Executive Officer is Chancellor Michael D. Stiles, at 2720 Stone Park Boulevard, Sioux City, Iowa. The Iowa contact person is its Student Services Department Chair, Danelle Johannsen, at the same address.

St. Luke's College is a subsidiary of Iowa Health System and Subsidiaries, doing business as UnityPoint Health. Since the school is a subsidiary of an Iowa hospital, it is not registered with the Iowa Secretary of State as a separate entity transacting business in Iowa.

St. Luke's College should not be confused with Mercy/St. Luke's School of Radiologic Technology in Cedar Rapids, IA, although both are subsidiaries of hospitals that are affiliates of the Iowa Health System.

Physical Facilities: St. Luke's College operates as a division of UnityPoint Health and all physical assets of the College are similarly physical assets of the medical center. The College currently controls the majority of the College Building consisting of 51,010 square feet at 2800 Pierce Street, Sioux City, Iowa. The College currently has classrooms, offices, library facilities, laboratories, conference rooms, and common space that consists of 35,440 square feet. The College controls an additional 15,570 square feet in the College Building at 2800 Pierce Street, Sioux City, Iowa, that is currently in the design phase. This space will be used for additional laboratories, classrooms and offices. A virtual tour of the College is available at <http://www.stlukescollege.edu/facilities.aspx>.

Accreditation: The College is accredited by the Higher Learning Commission (HLC), a regional accrediting agency recognized by the federal Department of Education. At this time, the College is not approved by the HLC to offer programs via distance education.

In addition, the College holds accreditation from special programmatic accrediting agencies that are recognized by the federal Department of Education, as follows:

- The Accreditation Commission for Education in Nursing, for the College's associate degree program in nursing
- The Commission on Collegiate Nursing Education, for the College's baccalaureate degree in nursing.
- The Joint Review Committee on Education in Radiologic Technology, for the College's associate degree in Radiologic Technology.
- The Association for Clinical Pastoral Education, Inc., Accrediting Commission, for the College's Clinical Pastoral Education certificate program.

Federal Stafford Loan Cohort Default Rate (FFY 2010): 5.0%. For comparison purposes, the FFY 2012 national average cohort default rate is 11.9%.

Graduation Rate: **100%**. This is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion as reported to the federal Department of Education.

Average Loan Debt upon Graduation: \$13,699 (institution-wide).

Record Preservation: Preservation of student records is managed by the Dean of Student Services. Retained student records in paper form are secured in locked, fire-proof file cabinets located in the Dean's office and in a secure location. Records in electronic form are retained on a server that is backed up nightly and accessible only by authorized users.

In the unlikely event that the College would close, it will deposit its academic records at the University of Iowa as required under Iowa Code Chapter 264.

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

Michelle Fitch
Students Services Department
2720 Stone Park Boulevard
Sioux City, IA 51104
(712) 279-3503
Michelle.fitch@stlukescollege.edu
<http://www.stlukescollege.edu/transcript-request.aspx>

Instructional Methodology: Predominately face-to-face instruction. The College also contracts with various health care facilities located in Iowa, South Dakota, and Nebraska, to provide students with clinical experiences in nursing, respiratory therapy, and radiologic technology. Supervision of a student in a clinical experience is provided by College faculty or a site preceptor who is a professional employee of the health care facility.

St. Luke's College utilizes the student portal to deliver some course material through an online method. The College has several general education and bachelor courses that deliver their content via the student portal. St. Luke's College currently utilizes the CAMS Learning Management System to deliver course content for distance education and hybrid courses, but will be transitioning to Blackboard beginning in the fall 2016 term. St. Luke's College also utilizes the Netlearning Learning Management System as a tool to deliver important College-wide information to students, facilitate student completion of faculty, course and clinical evaluations, and complete any UnityPoint Health system wide training. Learners enrolled in a distance education course will complete distance education course orientation and review the College's Distance Learning Guide.

Student Learning Resources: The Library <http://www.stlukescollege.edu/librarybookstore.aspx> has 3100 reference materials available to students - 600 nursing references, 110 general education references, 130 respiratory care references, 48 imaging sciences references, 89 print journals and approximately 7000 online journals that provide students the reference materials needed to be successful in the programs. Students may contact Librarians for research assistance in person, by phone, or via request submitted electronically from the Library Literature Search Request page. When classes are in session, the Library is open Sunday 12 noon to 5 pm; Monday and Wednesday 7:30 am to 5 pm; Tuesday and Thursday 7:30 am to 8 pm; and Friday 7:30 am to 4 pm. The Library is closed on Saturday.

Online resources that students may access remotely include the Library Catalog, and the databases PubMed, EBSCO, and EBSCO A-Z. Students may electronically access Micromedex, Zynx Health, and UpToDate, but only on-site at St. Luke's College. The College also provides electronic links to other Libraries, at Briar Cliff University, Dordt College, Morningside College, Western Iowa Technical Community College, the National Library of Medicine, Sioux City Public Library, and the State Libraries of Iowa Online.

The Library participates in Interlibrary Loan with a variety of libraries in the United States so students are able to access any material needed to aid in their success. Interlibrary Loan requests can be submitted in person, or electronically from the College's Interlibrary Loan web page.

Two full-time Library staff members and up to three work-study students are available to provide services and assistance to students during extended hours during the week. Additional resources and services the College provides to students include the following:

- Guidance provided by Librarians in formatting research papers according to the APA Style, and self-help resources in the APA Style that are available on the web.
- Tutoring at no charge. Students must be enrolled in the course for which they are requesting tutoring. The College has two professional tutors, one of whom is a retired College faculty member and the other is a retired nurse. Tutoring may be requested through the College's Student Services personnel.
- An online writing lab, The OWL at Purdue
- Resume Writing assistance
- Personal and professional development
- Personal counseling
- <http://www.stlukescollege.edu/filesimages/About%20Us/Consumer%20Info/2015-16%20Consumer%20Info/CounselingandGuidance.pdf>
- Study Guides and Strategies

Curriculum Evaluation and Development: Members of the College community conduct evaluation activities related to curriculum currency and rigor. A request for a curricular change can be originated by faculty or a member of the administrative team such as a department chair. Faculty members discuss with the department chair of the respective program any curriculum revisions. Department chairs initiate discussion with the faculty when curriculum revisions are due to an accreditation requirement or change; the result of trends in the field; or modifications in convention. Discussion of revisions occurs during staff meetings where minutes are kept. Ad hoc committees may be created to further assess curricular needs and/or generate recommendations for curricular revision.

Once program faculty members have approved the changes to curriculum, these changes are brought to the College Executive Team for review and endorsement. The College Executive members are the Chancellor, Dean of Nursing Education, Chief Academic Officer, Dean of Health Sciences Education, and Dean of Student Services.

The curricular changes are then brought to the College Board as an information item by the respective Division Dean.

Revisions are officially submitted to programmatic accrediting agencies as called for in the terms of the accreditation after final college approval and prior to implementation of the change. Recruitment materials are updated to reflect curricula changes upon accreditation approval.

Student Complaints Process: The College disclosed its process for handling nonacademic appeals or grievances and provides information about that process to students in its Student Handbook <http://www.stlukescollege.edu/filesimages/Current%20Students/Catalog%20Archives/StudentHandbook2015-16.pdf>.

The purposes of this procedure are to contribute toward developing mutual respect, to foster equitable communication, and to achieve reconciliation between the parties involved. It is to provide a systematic means of settlement.

All steps of the grievance procedure must be completed in the proper sequence and by the listed timeframe to be considered valid. If a resolution of the grievance is obtained in any given step that resolution is considered final.

Step 1:

The student discusses the situation with the individual(s) involved and the Department Chair. This discussion/conference must be scheduled within ten (10) business days of the occurrence or no later than ten (10) business days after semester/term grades are postmarked if the grievance relates to information not known by the student until the end of the semester/term. Students are encouraged to communicate openly and directly, and attempt to achieve a mutually agreeable resolution to the situation.

Step 2:

If satisfactory resolution is not achieved with Step 1, the student must submit the complaint in writing within no more than ten (10) business days to the Dean of Student Services who informs the Chancellor, or the Chancellor's designee, of the nature of the grievance appeal. If the grievance involves the Dean of Student Services, the written grievance/appeal goes directly to the Chancellor, or designee.

The written complaint must be as complete and specific as possible and include the following:

- The nature of the complaint
- The name(s) of the involved parties
- The date(s) of the occurrences
- The student's expected outcome

The Chancellor, or the Chancellor's designee, appoints a Chairperson for a grievance committee, the committee's members, and makes all parties aware of the grievance within five (5) business days of the receipt of the grievance. The committee is comprised of faculty and staff who are not involved in the appeal and who do not have a direct report relationship with anyone else on the committee. The total number of committee members, including the Chairperson will be an odd number.

Once the committee is named, the Dean of Student Services will forward the written complaint to the Chairperson. The Chairperson will forward all grievance documents to the committee members and the involved parties. The Chairperson will request any necessary documentation from the named parties to assist in the investigation of the complaint.

The Chairperson schedules a conference with the involved parties and the committee within five (5) business days of the naming of the committee. The purpose of the conference is to discuss the grievance/appeal, obtain information from the parties involved, and attempt to achieve a mutually satisfactory resolution. Each party involved may elect to be accompanied by an advocate from the College and/or Medical Center to assist in presentation of information. In addition, the Dean of Student Services may also serve as a student advocate and will be present during the committee proceedings if requested by the student. The advocate's name must be shared with the Chairperson prior to the meeting. The advocate will have no voting privileges. The Chair of the committee will have no voting authority except in cases of an impasse. The Committee will have up to five (5) business days to render its decision and communicate to the parties involved and the Dean of Student Services. Decisions will be communicated to all involved parties in written form

on College letterhead and delivered to the student as a certified letter. The Chairperson may send a copy of the certified letter via email.

Step 3:

If a satisfactory resolution is not achieved by either party in Step 2, the dissatisfied party must make a written appeal to the Chancellor within five (5) business days of the delivered, written committee decision. The written appeal must include the reason for the request for additional review by the Chancellor, and the expected outcome. After review of all information and discussion with involved individuals, the Chancellor will render a written decision within five (5) business days of the receipt of the appeal.

Programs Offered In Iowa

Note: The residential programs listed below are only those for which St. Luke's College may need coverage under the State Authorization Reciprocity Agreement (SARA) policies and rules, as it relates to supervised field experiences. However, the College's registration authorization to operate at a location in Iowa is at the institutional level. Thus, the Commission authorizes the institution to offer all of its programs in Iowa.

St. Luke's College offers the following health sciences-related programs in Iowa. Total estimated tuition charges, fees, books, supplies, and other costs payable to the school by a student is provided for each program.

Baccalaureate Degree Programs

- Bachelor Health Science: \$20,450
- Bachelor of Nursing (RN to BSN): \$20,450

Associate Degree Programs

- Associate of Science in Nursing: \$40,780
- Associate of Science in Radiology Technology: \$42,825
- Associate of Science in Respiratory Care: \$43,125

Certificate Programs:

- *Medical Laboratory Science: \$6,500
- *Phlebotomy Certificate: \$1,000
- *Mammography: \$4,030
- *Computerized Tomography: \$4,030
- *Magnetic Resonance Imaging: \$4,030
- *Ultrasound: \$5,970
- *Clinical Pastoral Care Certificate: \$600
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*Students attending these programs are ineligible for federal student aid.

Field Experiences: St. Luke's College executes standard contracts with various healthcare facilities to provide clinical field experiences for students who are enrolled in its health care programs. The College submitted two such contracts to illustrate the responsibilities of the field experience site and site preceptor under such arrangements. The College requires that the field experience site maintain normal staffing and not rely on students to meet patient care requirements. Students must be supervised by adjunct clinical advisors or preceptors (site

employees) when students are assigned to care for patients or clients at the field experience site. The field experience site and the College work together to ensure systematic planning of educational experiences and the exchange of information regarding policies, problems, and new developments. College faculty and field experience site personnel involved in student learning experiences meet at regularly scheduled intervals to evaluate the student's progress in the field experience. Contracts between the College and its field experience site affiliates are reviewed annually.

Additional information about the College's expectations of students in preparation for and during clinical experiences is documented in the Student Handbook

<http://www.stlukescollege.edu/filesimages/Current%20Students/Catalog%20Archives/StudentHandbook2015-16.pdf>.

Registration Compliance

As required by Iowa Code Section 261B.4, St. Luke's College disclosed its policy on refunding tuition charges for withdrawn students. The policy is disclosed in the Student Handbook at

<https://www.stlukescollege.edu/filesimages/Current%20Students/Catalog%20Archives/StudentHandbook2015-16.pdf>. The school's specific tuition refund policy is not a criterion for registration.

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

- Iowa Code Section 261.9(1)(e) requires a school to maintain and disseminate a drug and alcohol abuse policy that includes sanctions for violation of the school's policy and information about the availability of drug or alcohol counseling or rehabilitation. Iowa Code Section 261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that includes information about counseling opportunities and reporting instances of sexual abuse to school officials and law enforcement. These requirements duplicate policies and disclosures required by the federal Department of Education for a school that participates in the federal student aid programs. St. Luke's College maintains these policies and discloses them at multiple locations on its website:
 - ✓ <https://www.stlukescollege.edu/filesimages/Current%20Students/Catalog%20Archives/StudentHandbook2015-16.pdf>
 - ✓ <https://www.stlukescollege.edu/filesimages/About%20Us/Consumer%20Info/2015-16%20Consumer%20Info/AnnualSecurityReport2015.pdf>
 - ✓ <http://www.stlukescollege.edu/filesimages/About%20Us/Consumer%20Info/2015-16%20Consumer%20Info/DrugFreeCampus.pdf>
 - ✓ <http://www.stlukescollege.edu/filesimages/About%20Us/Consumer%20Info/2015-16%20Consumer%20Info/HealthDrugBackgroundScreen.pdf>
 - ✓ <http://www.stlukescollege.edu/filesimages/About%20Us/Consumer%20Info/2015-16%20Consumer%20Info/TitleIxpolicy.pdf>
 - ✓ <http://www.stlukescollege.edu/filesimages/About%20Us/Consumer%20Info/2015-16%20Consumer%20Info/CampusSecurityInformation.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. St. Luke's

College maintains a compliant policy and discloses it in the Student Handbook at <https://www.stlukescollege.edu/filesimages/Current%20Students/Catalog%20Archives/StudentHandbook2015-16.pdf>.

- 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 new policy now applies to Iowa's registered schools. St. Luke's College maintains a compliant policy and discloses it on its website at <http://www.stlukescollege.edu/filesimages/About%20Us/Consumer%20Info/2015-16%20Consumer%20Info/MandatoryReporting.pdf>.

Student Consumer Information: In its registration application, St. Luke's College affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. These disclosures are duplicative of the federal Department of Education's student consumer information disclosure requirements for a school that participates in the federal student aid programs. St. Luke's College provides these disclosures on various web pages and in its Student Handbook, as follows:

- <https://www.stlukescollege.edu/filesimages/Current%20Students/Catalog%20Archives/StudentHandbook2015-16.pdf>
- <http://www.stlukescollege.edu/accreditation.aspx>
- <http://www.stlukescollege.edu/filesimages/About%20Us/Consumer%20Info/WITHDRAWALPOLICY.PDF>
- <http://www.stlukescollege.edu/cost-of-attendance.aspx>

St. Luke's 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 provide Commission contact information for students who have questions or complaints about the school. The College will disclose this information in the Student Handbook and on its web-based Consumer Information page <http://www.stlukescollege.edu/consumer-information.aspx>.

Financial Responsibility: St. Luke's College submitted an audit report dated April 22, 2015, for its parent entity, Iowa Health System and Subsidiaries doing business as UnityPoint Health, conducted by an independent auditing firm BKD, LLP, covering the fiscal year ending on December 31, 2014. The audit report specifically identifies St. Luke's College as a subsidiary of the Iowa Health System. The auditing firm expressed its unqualified opinion that the system's financial statements present fairly, in all material respects, its financial position.

A private, nonprofit 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. While the independent firm that audited Iowa Health System and Subsidiaries did review federal student aid compliance performance of its system schools, staff did not find that the independent auditing firm reported or

tested St. Luke's College composite score. The most recent composite score available from the federal Department of Education for St. Luke's College is 3.0 (out of a possible 3.0).

Full-Time Iowa Resident Faculty Member or Program Coordinator: St. Luke's College employs 20 full-time, Iowa faculty.

Instructional/Supervisory Staff Qualifications: St. Luke's College submitted resumes for 11 faculty members in its nursing and imaging sciences education departments. One faculty member has a doctoral degree, seven have a master's degree and three have a baccalaureate degree. The three faculty members who hold a baccalaureate degree teach in the College's Imaging Science Education programs that culminate in either a postsecondary certificate or associate degree. Expertise among these faculty members includes areas such as neurological and psychiatric care, emergency nursing care, pediatrics, obstetrics, long-term care, geriatrics, urology, pharmacology, orthopedics, post-operative care, oncology, eye disease, infection control, radiology, nursing education, curriculum design and development, program evaluation, education administration, and accreditation.

Commitment to Iowa Students and Teach-Out: By executing an electronic signature on the registration application, St. Luke's College Chancellor Michael D. Stiles committed to the delivery of programs the College offers and agreed to provide alternatives for students to complete programs at St. Luke's College or another school if the College closes a program, or if the College closes before students have completed their courses of study.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

The College meets the conditions for an exemption from the financial responsibility requirements of Iowa Code Section 714.18. Under Iowa Code Section 714.19, subsection 10, it is a private nonprofit school that meets the criteria established under section 261.9, subsection 1, i.e., the College meets the institutional eligibility criteria for the Iowa Tuition Grant program.

Section 714.23 – State Tuition Refund Policy

The Iowa tuition refund policy does not apply to St. Luke's College because it is a private, nonprofit institution.

Compliance with Iowa Code Chapter 261F

St. Luke's College posts on its website a Code of Conduct for Educational Loans <http://www.stlukescollege.edu/code-of-conduct.aspx> that addresses provisions of Iowa Code Chapter 261F. The Code of Conduct appears to be an accurate and comprehensive reflection of Iowa Code provisions that govern certain aspects of business relationships between private education loan lenders and school personnel who have responsibilities related to education loans.

Iowa Code Chapter 261F also establishes conditions for preferred lender lists, and student disclosure requirements for schools that participate in preferred lender arrangements. Staff finds no evidence that the school participates in any preferred lender arrangement or otherwise refers its enrolled students to any specific private education loan lender. St. Luke's College counsels

students that it is the responsibility of the student and his/her family to research available private loan programs to determine which one is most appropriate for the student's needs

<http://www.stlukescollege.edu/financial-aid-program.aspx>.