

IOWA COLLEGE STUDENT AID COMMISSION

Trident University International Application for Postsecondary Registration Renewal September 2016

STAFF ACTION:

Approve Trident University International's application for registration renewal in Iowa for a consecutive term that begins on September 21, 2015 and ends on September 21, 2017.

Registration Purpose

Iowa Code §§ 261B.2 (definitions) and 261B.3 require a school to register with the Iowa College Student Aid Commission (Iowa College Aid) 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. Trident University International (Trident or the University) is applying for registration to offer distance education program to Iowa residents. Additionally, the Iowa Student College Aid Commission required Trident to register due to the fact that Trident employs Iowa faculty to provide instruction to its students.

Institutional Information

Trident University International (TUI) is a for-profit educational institution whose headquarters are located at 100 Plaza Drive, Cypress, California 90630. The Chief Executive Officer of the University is President, Travis Allen. The University is registered with the Iowa Secretary of State as a foreign limited liability company under business name Trident University International, LLC., business number 448870. Its registered agent and Iowa contact is CT Corporation System, 400 East Court Avenue, Des Moines, Iowa 50309.

Current Ownership and Governance: Trident University was established in 1998 and headquartered in Cypress, California. Trident is a virtual university, offering only wholly online programs. The legal entity that Trident University International is housed by is Trident University International, LLC. That legal entity is wholly owned by TUI Learning, LLC. TUI Learning, LLC is owned by Summit Partners Equity Fund VII-A, L.P. and SP PE VII-B Holdings, L.P.

Staff requested a list of the parties comprising Trident University's governing body and was provided the following list of corporate officers for the University.

Executive Leadership Team

- Travis Allen: Chief Executive Officer/ President, Trident University International

- Dr. Mihaela Tanasescu: Provost, Chief Academic Officer, and Accreditation Liaison Office, Trident University International.
- Dr. Afshin Afrookhteh: Senior Vice President/ Chief Compliance Officer, Trident University International
- David Barrett: Chief Financial Officer, Trident University International
- Eric Rajasalu: Senior Vice President of Marketing, Admissions, and Outreach, Trident University International
- Vahid Shariat: Chief Information Officer, Trident University International

Board of Trustees

- Dr. Karen Viechnicki: Chair of the Board, Trident University International
- Nolan Miura: Vice Chairman, Trident University International
- Stan Phillips: Board Member, Trident University International
- Dr. Linda Thor: Board Member, Trident University International
- Dr. Thomas Bloom: Board Member, Trident University International
- C.J. Fitzgerald: Managing Director, Trident University International
- William Gainey: Board Member, Trident University International
- Dr. Kathryn Hanson: Board Member, Trident University International
- General (retired) William Looney: Board Member, Trident University International
- Lieutenant General (retired) Thomas Metz: Board Member, Trident University International

Physical Facilities: Not applicable for a distance education provider.

Accreditation: The University is institutionally accredited by the WASC Senior College and University Commission (WSCUC). WSCUC is recognized by the United States Department of Education as a regional accrediting agency.

Federal Stafford Loan Cohort Default Rate (FFY 2012): 3.3%.

For comparison purposes, the FFY 2012, three-year national average default rate of all schools is 11.8%.

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. Trident University International reported a graduation rate of 39%.

Average Loan Debt upon Graduation: Trident University International reported, in its registration application, an average debt for students who received financial aid as being \$5,484.63.

Record Preservation: Trident University International's policy is that all formal student records will be maintained in the Office of the University Registrar, located at the University's main office in Cypress, California. The information that will be retained includes:

- Date of application for admission by the student
- Disposition of application for admission
- Official degree plans issued
- Official transcripts for transferred credits and prerequisite degrees
- Courses in which the student was enrolled and dates of attendance
- Grades assigned for all courses in which the student was enrolled
- Details on Academic Warning (if any)
- All credits transferred from any source other than the University
- Details on degree(s) awarded by the University
- Enrollment and degree verification
- Application and certification for VA benefits.

Backup Policy: All data and application code are backed up using Trident University NetApp (Storage Area Network) snap shot technology. Through this technology a snapshot of data is taken every four hours and stored. Additionally, a core database holding student and course information is backed up every six hours and is replicated to the disaster recovery remote data center on a nightly basis.

Disaster Recovery: Trident utilizes a disaster recovery data center hosted by Net2Vault located in the state of Arizona. This data center has electrical and mechanical equipment to prevent damage to systems from a fire and sustain any loss of electricity for an extended period of time. Trident systems and data are replicated every night to this data center. Student information is maintained in Trident Student Information System (CNSSS), and is replicated every 60 seconds to the disaster recovery data center.

Disaster recovery for the TLC Classroom, AppManager, and Email system is provided by Desire2Learn, Salesforce, and Microsoft respectively. Salesforce and Microsoft maintain several redundant data center across the United States and world. Desire2Learn maintains one disaster recovery data center in Canada with plans to build and maintain additional data centers in Asia in the near future.

Transcript Requests: Any current or former student of Trident University International may request a transcript by contacting:

Office of the Registrar
Trident University International
5757 Plaza Drive
Suite 100
Cypress, California 90630
(800) 375 – 9878 Ext. 1932
transcriptrequest@trident.edu

<https://www.trident.edu/students-and-alumni/office-of-the-registrar/>

Instructional Methodology: Trident offers four 12-week sessions and eight-week sessions. The 12-week sessions are available for enrollment quarterly, and the eight-week sessions are available monthly, meaning students may enroll in an eight-week course each month in the academic year. The 12-week sessions are available in Fall, Winter, Spring, and Summer. The eight-week sessions are available in the following months: January,

February, March, April, May, June, July, August, September, October, November, and December. Most courses at Trident comprise four semester credit hours. A full-time load at the undergraduate level is considered to be two four-credit courses at any given time. A full-time load at the graduate or doctoral level is considered to be one four-credit course per session.

All programs at Trident are offered fully online, this includes all course content and course-related material. Trident's Learning Management System is powered by the Desire2Learn (D2L) platform and is known as the Trident Learning Community (TLC). D2L functions internationally, with offices in Canada, the United States, Europe, Australia, Brazil, and Singapore.

Trident utilizes modern teaching and learning tools that create an engaging learning process with an instructor-controlled environment. Trident students may use the online library resources at no additional cost. The library may be accessed through the TLC student portal.

Curriculum Development: The University maintains an Academic Affairs Department as well as an Academic Leadership Team. With the recent restructure in Academic Affairs, the University's academic structure includes the Provost, Vice Provost, Deans, Associate Deans, Department Chairs, Directors of Doctoral Studies, Professors, Doctoral Mentors and Adjunct Faculty. The Academic Leadership Team is a voting body of the University, charged with upholding academic integrity of the University and ensuring the academic excellence of its degree programs, concentrations, and certificates. Its membership is currently comprised of senior academic leaders Provost and Deans, faculty leaders, and key leaders of academic support functions, such as the Director of Institutional Research and the Registrar. This body is responsible for approving all academic policies of the University and provides recommendations and input to the Executive Leadership Team and the Board of Trustees, as appropriate, on other key University matters.

The Trident Curriculum Committee, one of several academic committees at the University, is responsible for approving new programs and curriculum changes as presented by the respective Colleges. While development and revision of curriculum is the sole responsibility of the College, implementation cannot occur without approval from the Curriculum Committee.

Trident also has a comprehensive, University wide Program Review process in place. In addition to annual assessments, degree programs go through a comprehensive Program Review every five years. Historically, Program Directors were responsible for program reviews focused on key areas, such as: program outcomes, the types of data and evidence needed to assess curriculum, and student learning. With the recent restructure, the responsibility for Program Reviews rests with Deans, Associate Deans, Department Chairs and Directors collectively. Program teams are responsible for gathering, evaluating, and compiling data to provide analysis of the educational effectiveness of each program. At the Dean or Program Director's discretion, other members of the University community may be invited to add input to program reviews, this may include students or non-faculty staff members. External experts are used for the comprehensive Program Reviews.

While Deans of the Colleges have ultimate responsibility for overseeing the progress of ongoing program reviews, as well as facilitating the program review time line, the Director of Institutional Effectiveness and Assessment (DIEA) provides, among other things, regular guidance to program review faculty teams. The DIEA is a full-time academic administration position that reports directly to the Provost and works to bridge any gaps between the various Colleges and departments across the University. The program review self-reports include components pertaining to program context and alignment, program quality and viability, reflections, and goals for planning an improvement.

Results of the program reviews are used incrementally for improvement, planning, budgeting and for refinement of program outcomes, course and curriculum improvements, and improvement of assessment practices.

Student Learning Resources: Trident offers a variety of services to its students. Some of those services include:

Career Center: Students have access to an array of student services in the Career Advising and Development Center. Many of the resources are accessible 24 hours a day, seven days a week through My Career Center on the student portal. My Career Center is a password protected, virtual career center designed to assist students and alumni in career readiness self-assessment, job search, career exploration, and professional development. Through My Career Center, students may set up a virtual center career counseling appointment, sign up for new webinars, look for mentors, take an assessment, prepare their resume, or practice for an upcoming interview. The Career Center also lists job opportunities for both full-time and part-time positions, internships, and on-campus student assistant/ work study positions. Appointments should be scheduled at least one week ahead of time. The contact email for the Career Center is trident4careers@trident.edu.

University Library: Trident offers a comprehensive library to all students and faculty. The resources available include databases such as Academic Search Complete, ProQuest Central, and Ebrary. These sources provide access to thousands of publications and are available 24 hours a day, seven days a week. The Library may be accessed through the TLC student portal. The Library's services are available to students at no additional cost to them.

Trident has a professional librarian available to students and faculty as needed. The Librarian works on-site from the University's Cypress office, with remote capabilities, and responds to student and faculty requests promptly. Additionally, the Librarian creates instructional materials in the use of library resources which are available online to all Trident users. The library collections are fully online. The contact email for the University's Library is library@trident.edu.

Academic Success: Academic Success is committed to providing supplementary support for students at all levels. The Academic Success Counselors (ASCs) primarily focus on the successful transition of new students at the University. The ASCs also provide specialized support for students who: may not meet the University's admission requirements, fall below satisfactory academic progress, or have physical or mental impairments. This support is provided through the use of Academic Success Plans. The ASCs collaborate regularly with staff and faculty to identify and address the needs of students who experience personal,

professional, or academic issues that may prevent them from successfully completing their current courses and persist toward graduation. Students have access to ASCs as needed. The contact email for the Academic Success department is academicsuccess@trident.edu.

Student One Stop: The Student One Stop Department is a call/ help center that accepts incoming calls and emails from students. This department also serves as the operator function for the University as well as the frontline technological support team. Support staff provides assistance by addressing questions pertaining to the University in a wide range of areas, including: transcripts, financial aid, the admissions process, commencement information, official student grievances, registration, and departmental referrals. The goal of the Student One Stop (SOS) is to provide excellent customer support to Trident students while making the experience as friendly and seamless as possible. Students may contact their SOS with regard to any questions, concerns, or problems to obtain an appropriate resolution or referral. The email address for the SOS is sos@trident.edu.

Student Complaints Process: Trident has certain procedures set in place for the filing and resolution of complaints dependent upon the nature of the complaint. When grievances cannot be resolved informally, students may contact the Student One Stop (SOS) Department at sos@trident.edu for assistance in guidance as to where to take their concerns next.

Academic Grievance: Students are encouraged to resolve concerns involving a professor or an academic matter in an informal manner by first communicating with the course professor via email. The communication must be professional and must clearly set forth the nature of the grievance. If the matter cannot be resolved informally between the student and the professor, the student may submit the matter with supporting evidence to the appropriate Program Director, and then, if necessary, to the College Dean. If the matter still remains unresolved, it may then be submitted to the Provost's Office.

Non-Academic Grievance: Students are encouraged to resolve concerns involving a non-academic matter in an informal manner by first communicating with the appropriate administrative unit within the University. The communication must be professional and clearly set forth the nature of the grievance. If the matter cannot be resolved informally between the student and the administrative unit, the student may submit the matter with supporting evidence to the Director of that unit. If the matter remains unresolved, it may then be submitted to the appropriate Vice President. Students may contact the Student One Stop (SOS) Department for assistance and guidance at any time.

Complaint Resolution System: The formal Complaint Resolution System is designed to provide rapid and definitive resolution of complaints requiring formal investigation of actions inconsistent with Trident policy, accreditation standards, or state and federal regulations, including: allegations of conflict of interest, discrimination, or harassment. The complainant must indicate in the complaint that a serious effort was made to informally resolve the grievance. Upon receipt, complaints are forwarded to appropriate department supervisors for formal investigation and resolution. Upon resolution of the complaint, a follow-up by an appropriate Trident team member is conducted with the student before the case is officially closed.

Third-Party Complaints: Complaints related to accreditation and regulatory matters from prospective students, non-students, or other entities may be submitted to the Chief Compliance Office at compliance@trident.edu. The complaint will be conveyed to appropriate officials and may be shared with other parties as deemed appropriate.

Complaints to External Agencies: Complaints associated with academic program quality and accreditation standards may be filed with the Western Association of Schools and Colleges (WASC), at www.wascsenior.org/comments. Students or any members of the public may file a complaint about Trident with the Bureau for Private Postsecondary Education via phone or an electronic complaint form, accessible at www.bppe.ca.gov. Additionally, students may file a complaint with their state agency. Iowans may file a complaint with the Iowa Student College Aid Commission, whose contact information is accessible at <https://www.trident.edu/Media/Default/Policies/State-Authorization.pdf> as well as a link provided in the Policy Handbook, <https://www.trident.edu/wp-content/uploads/2016/01/student-complaint-information.pdf>.

Programs Offered In Iowa

Trident University International offers the following programs via distance education, the list before includes the programs offered and the total estimated tuition charges, fees, books, supplies, and other costs payable to the school by a student for each program.

Baccalaureate Degree Programs

- Bachelor of Science, Business Administration: \$45,150
- Bachelor of Science, Health Sciences: \$45,150
- Bachelor of Science, Information Technology Management: \$45,150
- Bachelor of Science, Computer Science: \$45,150
- Bachelor of Science, Human Resource Management: \$45,150
- Bachelor of Science, Leadership: \$45,150
- Bachelor of Science, Homeland Security: \$45,000

Master Degree Programs

- Master of Business Administration (no concentration): \$18,510
- Master of Business Administration (with undergrad business degree): \$22,590
- Master of Business Administration (no undergrad business degree): \$24,630
- Master of Arts, Education: \$18,510
- Master of Science, Health Sciences: \$20,550
- Master of Science, Health Administration: \$20,550
- Master of Science, Emergency Disaster Management: \$20,550
- Master of Science, Information Technology Management: \$18,510
- Master of Science, Human Resource Management: \$18,510
- Master of Science, Leadership: \$18,510
- Master of Science, Homeland Security: \$20,550

Doctoral Degree Programs

- Doctor of Philosophy, Business Administration: \$54,885 – \$54,925

- Doctor of Philosophy, Health Sciences: \$54,885 – \$54,925
- Doctor of Philosophy, Educational Leadership: \$54,885 – \$54,925
- Doctor of Education, Educational Leadership: \$43,785 – \$43,825

Field Experiences: The University stated in its application for registration that it currently does not offer any programs which contain mandatory field work.

Registration Compliance

Administrative rules for registered schools specifically require a school to comply with the requirements of Chapter 261.9(1) “e” through “h”.

- Iowa Code § 261.9(1)(e) requires a school to maintain and disseminate a drug and alcohol abuse policy that includes sanctions for violation of the school’s policy and information about the availability of drug or alcohol counseling or rehabilitation. Trident University maintains a compliant policy and discloses it to its students in its Policy Handbook.
- Iowa Code § 261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that includes information about counseling opportunities and reporting instances of sexual abuse to school officials and law enforcement. These requirements duplicate policies and disclosures required by the federal Department of Education for a school that participates in the federal student aid programs. Trident maintains a compliant policy and discloses it in its Policy Handbook.
- Iowa Code § 261.9(1)(g) requires a school to maintain a special policy tuition and mandatory fee 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. Trident maintains a compliant Military withdrawal policy for its Iowa resident students and discloses it at <https://www.trident.edu/Media/Default/Policies/State-Specific-Refund-Policies.pdf>.
- Iowa Code § 261.9(1)(h) requires a school to develop and implement a policy for employees who, in the course of their employment, attend, examine, counsel, or treat a child and who suspect the physical or sexual abuse of that child. By cross-reference from existing administrative rules for registration [283-21.2(261B), § 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. Due to the fact that Trident employs Iowa resident faculty, this policy is required of the University. The University maintains a compliant policy and discloses it to its Iowa employees via email.

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 § 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 federal student aid programs. The University provides this information to its students in its University Catalog as well as Policy Handbook. Students may locate the Catalog and Handbook at the following locations:

- https://e773553956c9c1872950-735b664236457e5d52346f712a88c794.ssl.cf5.rackcdn.com/wp-content/uploads/2016/04/Academic-Programs_2016-2017.pdf
- https://e773553956c9c1872950-735b664236457e5d52346f712a88c794.ssl.cf5.rackcdn.com/wp-content/uploads/2016/08/Policy-Handbook_2016-2017.pdf

The College affirms on the application that it will comply with the provisions of Iowa Code § 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 Iowa College Aid and disclose Iowa College Aid contact information for students who have questions or complaints about the school. Trident discloses this information on its State Authorization webpage, accessible at <https://www.trident.edu/Media/Default/Policies/State-Authorization.pdf>.

Financial Responsibility: Trident University International provided a copy of an independent audit of TUI Learning, LLC. for the fiscal years ending June 30, 2014 and 2013. The audit was conducted by the independent auditing firm BDO USA, LLP. The auditing firm expressed its opinion that the corporation’s financial statements present fairly, in all material respects, the financial position of South University, Inc. and 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. Trident University reported a composite score of -1.0 out of a possible 3.0. As a result of this composite score, Trident did not meet the required measure of financial responsibility. Trident is provisionally certified to participate in federal student aid programs until September 2017, under an irrevocable letter of credit (LOC) posted with the federal Department of Education in the amount of \$4,350,875 effective through June 30, 2017. The amount of the LOC equals 10 percent of the total Title IV aid received by students attending Trident during the institutional fiscal years ending June 30, 2014 and 2013.
- 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. In its independent audit conducted by BDO USA, LLP. TUI Learning, LLC. reports that 22.5% of its revenue is derived from Title IV funding for the institutional fiscal years ending on June 30, 2014 and 2013.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Trident does not employ any Iowa residents who provide the University with operational support. However, the University does employ five Iowa residents to provide instruction to its students.

Instructional Staff Qualifications: Trident employs five Iowa resident faculty members to provide instruction to its students. One of the five faculty members holds a dual master’s degree; a Master of Business Administration and a Master of Public Administration degree. Four out of the five instructors hold doctoral degrees, all of which are in the fields of

business administration and public health. Trident maintains the credentials for 34 full-time faculty members in its Policy Handbook. Three out of 34 faculty members hold master level degrees. 31 out of 34 faculty members hold doctoral degrees. All of these instructors have extensive professional experience.

Commitment to Iowa Students and Teach-Out: By executing his signature on the application, the Trident University International Chief Executive Officer and President, Travis J Allen, commits to the delivery of programs in Iowa, and agrees to provide alternatives for students to complete programs at other institutions if the University closes a program, or if the University closes before students have completed their courses of study.

Student Complaints: None.

Compliance with Iowa Code Chapter 714

§ 714.18 – Evidence of Financial Responsibility

Trident University International has filed satisfactory evidence of financial responsibility under Iowa Code Section 714.18. The University has submitted a current surety bond payable to the State of Iowa in the amount of \$50,000, issued through Woodruff Sawyer and Company, effective through November 29, 2016.

§ 714.23 – State Tuition Refund Policy

Trident University International maintains a compliant tuition refund policy and discloses it in its Policy Handbook.