

IOWA COLLEGE STUDENT AID COMMISSION

Vatterott College Application for Postsecondary Registration Renewal October 7, 2016

STAFF ACTION: Approve Vatterott College's request to renew its Iowa registration for a two-year term that begins retroactively on March 16, 2015 through March 16, 2017.

Registration Purpose

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 (effective July 1, 2012) require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this state or if the school otherwise has a presence in this state. Presence means a location in Iowa at which a student participates in any structured activity related to a school's distance education course of instruction. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations. Vatterott College applied to renew its registration in order to continue to operate in Iowa from its permanent physical location in Des Moines, Iowa, and to offer Iowans distance education programs that are coordinated by its campus in Sunset Hills, Missouri. At least one of its distance education programs includes a structured field experience that an Iowan will participate in at an Iowa location.

Institutional Information

Vatterott College (the College) is a for-profit postsecondary educational institution that provides programs via in-person instruction at 7000 Fleur Drive, Des Moines, Iowa, 50321. The College coordinates the distance education programs it offers Iowans from its location at 12900 Maurer Industrial Drive, Sunset Hills, Missouri, 63127. The College's Chief Executive Officer is President Rene Crosswhite, 9807 S. Forty Drive, St. Louis, Missouri 63124. Vatterott College is wholly owned subsidiary of Vatterott Educational Centers, Inc. The College's Iowa contact person is Des Moines Campus Director, Kimber Davis, 7000 Fleur Drive, Des Moines, Iowa 50321.

Persons who make operational and academic decisions for Vatterott College on a national level, and who are similarly charged for all other schools owned by Vatterott Educational Centers are:

- Ms. Rene Crosswhite – President and CEO. Ms. Crosswhite holds a Masters in Health Administration and is a Certified Public Accountant. Her professional history dates back to 1991 in areas that include financial, operational, project, and performance management in various sectors of the health services industry. She has also been in leadership roles (Vice President, Interim CEO and CFO) of health care organizations. Ms. Crosswhite initiated her tenure with Vatterott in 2013 as Chief Financial Officer and transitioned to the role of President and CEO of Vatterott in 2016.
- Dr. Oscar Moretti – Provost. Dr. Moretti holds a Ph.D. in Organization and Management, and a Master of Science in Engineering Administration. Dr. Moretti's experience includes approximately 25 years working with city, state, provincial and federal agencies in the U.S. and Latin America in the field of engineering design and

project management. Dr. Moretti also has experience in teaching at the postsecondary level, and, beginning in 2009, in higher education management. Dr. Moretti was named Provost at Vatterott in 2015.

- Mr. Scott Casanover – General Counsel and Chief Administrator. Mr. Casanover holds a Juris Doctor and has been employed with Vatterott in his current role since 2009. Previously, Mr. Casanover held positions as legal counsel for business and service corporations.

Vatterott Education Centers' separate Board consists of the following individuals:

- Mr. Dennis Ainge
- Mr. Jeffrey S. Barber
- Mr. John Danielson
- Ms. Jean Carnahan.

Physical Facilities: Vatterott College's Des Moines location is at 7000 Fleur Drive, a new building that was constructed for the College and first occupied in November of 2006. The building was designed to accommodate a variety of trades, allied health, and information technology programs. The instructional facility occupies approximately 44,000 square feet on approximately 5.5 acres of land, which includes 280 parking spaces. The instructional facility houses 20 classrooms, a learning resource center (LRC) which is the campus library facility, and a student lounge. The following facilities address specific program needs:

- The Diesel Mechanic program has a large shop area that can hold up to three full size semi cabs and three welding stations with all proper safety equipment.
- The HVAC (Heating, Air Conditioning and Refrigeration Mechanic) area has multiple heating and cooling units.
- The Dental department has one functional and one expansion laboratory, one large dental clinical with four operational areas, three operational x-ray bays, a dedicated sterilization area, and a large darkroom that is shared with the Medical department.
- The Medical department has a large functional medical clinic with three private exam areas, a classroom computer lab, and a room with x-ray equipment used for positioning of patients and exposure of phantom body parts.
- The CSNT (Computer Systems & Network Technology) area has computer systems in each classroom with hardware and software appropriate for each program application.

The College provided a copy of a current lease for the Des Moines location. While the lease was executed in 2007, it remains valid for 12 complete lease years thereafter.

Accreditation: The Des Moines campus of Vatterott College is accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC), a national accrediting agency recognized by the federal Department of Education. The program in Dental Assisting is accredited by the Commission on Dental Accreditation, a specialized accrediting body recognized by the US Department of Education. The College's Sunset Hills – Missouri

location, which supports the College's online programs, is also accredited by the Accrediting Commission of Career Schools and Colleges.

Vatterott College also holds programmatic accreditation from the Accrediting Bureau of Health Education Schools (ABHES), an accrediting body that is recognized by the federal Department of Education, for a Medical Assistant Occupational Specialist diploma program that is offered on-campus at the College's Des Moines, Iowa location. On August 8, 2016, the ABHES issued a directive to the College requiring it to show cause why its accreditation should not be withdrawn. Pursuant to an accrediting agency standard that requires the College to show at least a 70 percent placement rate in this program, ABHES requires the College to provide documentation supporting its retention rates in this program for the period of July 1, 2016 to September 30, 2016; an analysis of all drops reported, and a detailed explanation of precisely how and when the institution expects to be in compliance. This matter does not impact Iowa students enrolled in this program as it relates to their ability to obtain employment in the medical assisting field in Iowa, as the State of Iowa does not require licensure or certification of medical assistants, or otherwise set educational standards for persons employed in this profession. If the College loses ABHES accreditation, its graduates would be ineligible to sit for a national certification examination through the American Association of Medical Assistants, which is preferred by some employers.

As of the date of this report, Vatterott advises staff that the Medical Assistant Occupational Specialist program at the Des Moines campus ended the ABHES reporting period (July 1, 2016 to September 30, 2016, with a 95% retention rate, well above the ABHES benchmark.

Federal Stafford Loan Cohort Default Rate (FFY 2013):

- Des Moines campus: 25.1%
- Berkley, Missouri (which includes the Sunset Hills, Missouri online campus): 24.7%

For comparison purposes, the FFY 2013 national average cohort default rate 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.

- Des Moines campus: 44%
- Sunset Hills, Missouri (online) campus: 52%

Average Loan Debt upon Graduation:

- Des Moines campus: \$21,341
- Sunset Hills, Missouri (online) campus: \$25,066

Record Preservation: Vatterott College maintains student records in accordance with its internal record retention guidelines, which are informed by the applicable requirements of its various accreditors, and state and federal regulators. These guidelines identify minimum retention periods for several categories of student records, including registration and academic progress records, admissions records, and financial aid records, to name a few. When records have exceeded their retention period, they are disposed of by the campus. Permanent records

(for example, transcripts) are either kept onsite or moved to an off-site, secure storage facility. Additionally, these records are kept electronically through the College's CampusVue student records system. At all times, such records are preserved in a location that affords protection against damage and loss.

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

Campus Registrar
7000 Fleur Ave.
Des Moines, IA 50321
(515) 309-9000

The College also maintains an online transcript request form at
<http://www.vatterott.edu/current.asp>

Instructional Methodology:

- *Des Moines campus:* With one exception, the programming offered by the College at its Des Moines campus is delivered on-ground, primarily utilizing a combination of traditional classroom instruction (lecture) and hands-on training (lab). In addition, a number of programs include an externship experience, which typically takes place during the student's ultimate or penultimate term and occupies the majority of the term. While the Des Moines location's instruction is delivered almost entirely on-ground, the College uses an online platform to deliver an array of learning and support services, for example electronic library resources and career services webinars. The Des Moines location also offers an online GED Exam Preparation Course. The goal of this online course is to prepare students for the GED test. Using the College's online platform, the course covers question formats for each discipline tested, insight into question formats for each content area tested, sample practice test items, explanation of sample question answers, and specific tips and insights for passing each test section and content area. Vatterott College informed staff of its GED preparation program in January of 2012. Staff referred the College to the Iowa Department of Education for coordination with its GED guidelines.
- *Sunset Hills, Missouri (online) campus:* The College's Sunset Hills, Missouri location partners with Instructure, through the Canvas Learning Management System, an online interactive education platform. This system allows the College to create learning content using web based tools, develop custom learning paths for individual students or groups, facilitate student participation, communication and collaboration, and evaluate the student's work using assessment capabilities for outcomes. The various Canvas applications are intuitive, easy for students and instructors to use, and are built on a scalable enterprise technology that facilitates performance. Each student who enrolls in the online program is issued a user name and password that provides unlimited access.

Student Learning Resources: Hard-copy learning resources are available to students attending the College's Des Moines campus in the on-campus Learning Resource Center (LRC) which contains computers, texts, journals, electronic resources, Internet accessible research databases, and other similar resources and equipment. An onsite LRC Manager provides students with assistance navigating the in-house resource collection during normal

business hours: Monday, Wednesday, Thursday and Friday 8 am to 5 pm; Tuesday 8 am to 8 pm. Assistance available to students from the LRC includes:

- Guidance to students seeking on-line tutoring resources.
- Assistance to students engaged in on-line job searches and completion of on-line job applications.
- Resume and term paper writing assistance.
- Remedial tutoring for students seeking to improve their computer skills.
- Training in the use of on-line data bases.

Online library resources http://www.vatterott.edu/EBSCO_host.asp are available to all residential and online students through EBSCO Host, an online research database provided by EBSCO Publishing. This service permits students to conduct research for projects, papers, and class assignments from remote locations, offers access to textbooks, periodicals, white papers, research journals, electronic resources, and resource materials. Databases that are available through the electronic Learning Resource System include Associates Program Source Plus, Computers and Applied Sciences Complete, GreenFILE, Library, and Information Science & Technology Abstracts (LISTA).

Each College location has its own online student portal, through which students may access information relating to their academic progress, and through the Canvas component, their courses, their grades, syllabi, weekly outlines, and other support materials. The students can access this information remotely.

Both the Des Moines and Sunset Hills (online) campuses offer students tutoring assistance, retention services (personal advising and counseling) and career services. The Vatterott Student Tutoring Advising and Resources (VSTAR) program was designed to educate new students regarding what resources each campus offers, but also to successfully help transition new students into college life. Various workshops are presented through the program, including: Making Your Mark, Timing is Everything, New Student Technology Training, Creating a Career Vision and a Financial Literacy Workshop.

All student services are available to both on-ground and online students.

Curriculum Evaluation and Development: All of the College's programs are created under a standard curriculum design process. An internal curriculum committee, comprised of current faculty with expertise in the appropriate subject area, creates each program's content and structure with oversight from the College's senior academic personnel. The committee identifies the knowledge and skill objectives for students completing each course in a program, develops common assessments for each course and, ultimately, pre- and post-test course examinations for the program, enabling the College to measure student performance and institutional effectiveness. All elements of a program are developed in consultation with a Program Advisory Committee (PAC). A PAC committee consists primarily of representatives from the employment community and practitioners. PAC members review and provide direction relating to the established curricula of a program, instructional-related program materials, equipment and facilities, and student achievement objectives. PAC members do not approve programs, nor is there any requirement that they always be unanimous in their views. They are an advisory committee only. However, any feedback received from a PAC is given

the utmost consideration. Many PAC members are business owners that employ the College's graduates.

Student Complaints Process: Should a student have a grievance or complaint concerning any aspect of his or her recruitment, registration, attendance, education, or student services, they should first contact the faculty or staff member to whom the grievance or complaint refers. If the student remains dissatisfied, he must submit his grievance or complaint in writing to the Director of Education. The Director of Education will review the issue, seek resolution and notify the student of the remedy within 10 days. If the student is not satisfied with the response from the Director of Education, the student must appeal to the institution's director in writing and within 10 days of receiving the director of Education's decision. The institution Director will respond to the student's appeal within 10 days. Students who wish to contest a Director's resolution may submit a written appeal to the General Counsel and Chief Administrator, Vatterott Educational Centers, Inc., whose decision is final. At any time the student may contact the Vatterott Educational Centers, Inc., Student Affairs division for assistance. The student may also, at any time, contact the Iowa College Student Aid Commission or the Accrediting Commission of Career Schools and Colleges, the agency's accrediting agency. Vatterott College discloses its grievance policy to students in its course catalogs:

- Des Moines campus: http://www.vatterott.edu/Documents/catalogs/Des_Moines.pdf
- Sunset Hills (online) campus: http://www.vatterott.edu/Documents/catalogs/Sunset_Hills.pdf

Programs Offered In Iowa

The total, estimated cost of tuition, fees, books and supplies for each program is listed below.

On-Ground Programs Offered at Vatterott's Des Moines campus

- *Certificate Programs* (this program is ineligible for federal student aid)
 - ✓ Commercial Driver's License: \$4,250
- *Diploma Programs*
 - ✓ Medical Assistant Occupational Specialist: \$20,384
 - ✓ Heating, Air Conditioning and Refrigeration Service Technician: \$25,425
 - ✓ Powersports Equipment and Small Engine Mechanic: \$21,500
- *Associate Degree Programs*
 - ✓ Computer Programming and Development: \$39,090
 - ✓ Computer Systems and Network Technology: \$32,796
 - ✓ *Dental Assistant Specialist: \$31,260*
 - ✓ Diesel Mechanic: \$37,450
 - ✓ Heating, Air Conditioning & Refrigeration Technician with Management: \$38,280
 - ✓ *Medical Assistant with Limited Radiography Technology: \$36,261
 - ✓ Medical Assistant with Office Management: \$36,176

*The Iowa Board of Dental Examiners licenses Dental Assistants. The Board requires that a school's Dental Assistant program be approved by the American Dental Association Commission on Dental Accreditation (CODA). Vatterott's program at the Des Moines campus is approved by CODA.

‡ The State of Iowa Department of Public Health licenses "Limited Radiographic Technologists." The Department of Public Health requires that a successful licensee's educational program either be approved by the Joint Review Committee on Education in Radiologic Technology (JRCERT) or by the Iowa Department of Public Health Bureau of Radiological Health. Vatterott's program is not accredited by JRCERT. However, staff contact with the Iowa Bureau of Radiological Health confirms that does not officially "approve" colleges that offer this training program, but ensure that the student applying for the examination have met minimum training requirements for the examination. The Iowa Bureau of Radiological Health confirms that Vatterott graduates have been and currently appear to meet these requirements.

Online Programs

- *Diploma Programs*
 - ✓ Medical Assistant Occupational Specialist: \$19,800

- *Associate Degree Programs*
 - ✓ Business Management: \$31,309
 - ✓ Information Systems and Security Specialist: \$36,300
 - ✓ Medical Billing & Coding: \$34,100
 - ✓ Paralegal: \$31,220
 - ✓ Pharmacy Technician: \$40,800. Pharmacy technicians must be registered with the Iowa Board of Pharmacy. The Board does not approve educational programs that prepare students for the pharmacy technician field. However, in addition to registration, the Board requires a person working in this capacity in an Iowa pharmacy to be nationally certified by an accredited technician certification board: the Pharmacy Technician Certification Board or the National Healthcareer Association. Vatterott's program includes two courses of instruction, for a total of 7.5 quarter credit hours, which focus on the Pharmacy Technician Certification Board examination. A third course consisting of 11 quarter credit hours includes preparation for the national certification examination and a comprehensive review of the Pharmacy Technician curriculum.
 - ✓ Computer Programming and Development: \$39,090

- *Continuing Education Programs* (Note: None of these programs are eligible for federal student aid.)
 - ✓ Basic Fire Alarm Installation: \$650
 - ✓ Electronic Evidence Discovery: \$1445
 - ✓ Smartphone Programming: \$510
 - ✓ Your Role in the Green Environment: \$335

Field Experience: Some of the courses offered at Vatterott Online require a student to complete on-site field work in the state of Iowa. The following is a list of programs and a brief description of the field work the program entails:

- Pharmacy Technician, On-Campus: The Capstone course in this program is a practicum in which the student receives supervision from a licensed pharmacist at an Iowa pharmacy.
- Medical Assistant Occupational Specialist, On-Campus: A student participates in a 240-hour externship at a medical facility under the supervision of, at minimum, a professional medical assistant.
- Medical Assistant with Limited Radiography Technology Externship, On-Campus: Students in this program are expected to perform a minimum of 180 hours of externship in a clinical experience at an approved site under the supervision of a certified limited radiography technician.
- Commercial Driver's License Certificate, On-Campus: This program consists of 160 clock hours in which students will spend a considerable amount of time behind the wheel engaged in a driving experience under the supervision of a licensed commercial driver.
- Dental Assistant Specialist, On-Campus: Students are required to work for 32 hours per week until they have reached 320 clock hours at an assigned site. Supervision for the student is provided by a licensed dentist. A faculty member will visit each site for evaluation of the student throughout the duration of the experience.

In all cases, externship site supervisors are expected to provide students with proper supervision and guidance that aligns with learning outcomes, and provide formal feedback to College faculty via midterm and final externship evaluations.

Registration Compliance

As required by Iowa Code Section 261B.4, Vatterott College disclosed its institutional policy on refunding tuition charges for withdrawn students at the Des Moines campus and for Iowa resident students enrolled in online programs coordinated by the College's Sunset Hills campus. The College's tuition refund policy meets the requirements of Iowa Code Section 714.23 and is disclosed to students in the respective course catalog for the Des Moines and Sunset Hills locations at:

- http://www.vatterott.edu/documents/catalogs/Des_Moines.pdf
- http://www.vatterott.edu/documents/catalogs/Sunset_Hills.pdf

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. Vatterott College complies with the requirements of Iowa Code Section 261.9(1)(e) and (f), for both the Des Moines and Sunset Hills campuses, through disclosures provided by one or more of the following:
 - ✓ The campus annual security reports located at http://www.vatterott.edu/Documents/security_reports/des_moines.pdf and http://www.vatterott.edu/Documents/security_reports/sunset_hills.pdf

- ✓ The campus Catalogs located at http://www.vatterott.edu/documents/catalogs/Des_Moines.pdf and http://www.vatterott.edu/documents/catalogs/Sunset_Hills.pdf
 - ✓ Separate Consumer Information web pages devoted to the topics http://www.vatterott.edu/consumer_information.asp
 - ✓ <http://www.vatterott.edu/Title-IX/title-ix.asp>
- 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. Vatterott College maintains this policy for students attending its Des Moines campus and Iowa resident students attending its online programs coordinated by its Sunset Hills, Missouri campus. The policy is disclosed to students in the respective course catalogs for the Des Moines and Sunset Hills locations at:
 - ✓ http://www.vatterott.edu/documents/catalogs/Des_Moines.pdf
 - ✓ http://www.vatterott.edu/documents/catalogs/Sunset_Hills.pdf
 - Iowa Code Section 261.9(1)(h) requires an Iowa 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. Vatterott College maintains a policy that complies with this requirement for personnel working in Iowa, and discloses the policy in its Annual Security Report for the Des Moines campus located at http://www.vatterott.edu/Documents/security_reports/des_moines.pdf.

Student Consumer Information: In its registration application, Vatterott 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 and the College discloses them in its respective course catalogs for the Des Moines, Iowa and Sunset Hills, Missouri (online) locations at http://www.vatterott.edu/documents/catalogs/Des_Moines.pdf and http://www.vatterott.edu/documents/catalogs/Sunset_Hills.pdf.

Vatterott College affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7. These provisions state that provided a school does not claim "approval" or "accreditation" by the Commission or the State of Iowa, 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 University currently discloses the Commission's contact information for student complaints in its respective course catalogs for the Des Moines and Sunset Hills, Missouri locations. In addition, and on its separate Consumer Information web page at <http://www.vatterott.edu/cpd.asp>.

Financial Responsibility: Vatterott College submitted copies of an audit of its parent company, Vatterott Educational Centers, Inc., conducted by independent auditing firm Ernst and Young, LLP, for the fiscal years ending December 31, 2015 and 2014. The audit report is dated May 31, 2016. The auditing firm expressed its opinion that the company's financial statements present fairly, in all material respects, its financial position.

- A for-profit institution that participates in the federal student aid programs must maintain a composite score, based on a three factor financial responsibility ratio, of at least 1.5 in order to be determined "financially responsible" without additional oversight. For the most recently evaluated institutional fiscal year, Vatterott College did not meet 1.5 composite score threshold. Therefore, to satisfy the federal Department of Education's financial responsibility expectations, the College has posted a current letter of credit with the U.S. Department of Education in the amount of \$12,582,632.00.
- A for-profit institution is prohibited from deriving more than 90% of its revenue from Title IV aid. The most recent 90/10 ratios verified by the federal Department of Education are as follows:
 - ✓ Des Moines campus: 87.89%
 - ✓ Sunset Hills (Berkeley) campus, which supports the online programs: 84.84%.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Vatterott College discloses a total of 26 faculty members at its Des Moines campus. Nine of the faculty members, including the Campus Director, are full-time employees while the remaining 17 are part-time.

Instructional/Supervisory Staff Qualifications: The College provided 17 resumes for faculty who teach at the Des Moines campus in programs that the College currently offers. For the purpose of evaluating campus-based faculty, staff notes that the highest degree Vatterott College offers at the Des Moines campus is an Associate Degree, and that several of the programs are skill-based, undergraduate certificate or diploma programs.

The campus-based faculty review revealed the following:

- Three of the instructors hold masters degrees. One instructor has worked as a lab supervisor for Aerospace for a large number of years. The second of the four instructors holds a Master of Science in Criminal Justice. The third instructor holds a Master of Science in Industrial Psychology with many years of human resource management experience. The fourth of these instructors holds a Master of Arts in Mathematics for Elementary and Middle School Grades. This instructor has been teaching since 1994.
- Six of the instructors hold baccalaureate level degrees. Those degrees are in the following fields: business administration, medical assisting, mechanical engineering, criminal justice, health arts, and radiation sciences. One of these instructors is the Des Moines Campus Director; another is the powersports program director.
- Five of the instructors hold associate level degrees. Those degrees are in the following fields: a dual degree in telecommunications and computer systems and network technology, applied science, dental assisting, automotive, and heating and cooling. One of these instructors has professional experience that dates back to 1990 and experience in technology starting in 2005. The second of the six instructors has experience in dental

assisting since 2009 and is a registered dental assistant. The third instructor has been a diesel technician since 2006. The fourth instructor has been a HVAC technician since 2005. One of these instructors is the diesel mechanic program director. The other two instructors are enrolled in baccalaureate level programs, one in computer information systems and the other in small business management.

The last three on-campus faculty members do not indicate which degrees they hold, if any. However, they are all teaching in vocational certificate or diploma programs such as diesel mechanic, commercial driver's license, and heating and cooling in which professional experience and/or professional licensure or certification would be satisfactory to qualify the individual for his or her teaching assignment. These three individuals have the following professional history and credentials in the area in which they provide instruction:

- Over 20 years experience in farm equipment maintenance, five years experience in aviation maintenance and repair.
- Over 19 years of experience as a radiologic technologist and radiologic technology trainer. This person is a graduate of the Johns Hopkins School of Advanced Imaging in Radiology.
- Over 25 years of experience as a dental hygienist practitioner, trainer, or supervisor. This individual is a registered dental hygienist.

The College provided the credentials for 26 faculty members that provide instruction in the College's online programs, as follows:

- One of those instructors holds an associates degree in business management with 23 years as a licensed practical nurse.
- Six of the faculty members hold baccalaureate level degrees in the following fields: healthcare management, computer engineering, information systems security, pharmacy, business administration, and communication. One of these six instructors is pursuing a Master of Business Administration degree. Another of these instructors is a registered and licensed pharmacy tech with over 20 years of experience.
- Sixteen of the 26 instructors hold various masters degrees. Those degrees are in the following fields: business administration, education, geology, human service, paralegal master's certificate, pharmacy, public health, public relations, and training and development. Many of these instructors hold professional certifications and licenses. One of these instructors is a doctoral candidate.
- Three instructors hold doctoral level degrees. Two are Juris Doctors and the third is a Doctor of Chiropractic. One of the Juris Doctors has a paralegal certificate in addition to their doctoral degree.

Commitment to Iowa Students and Teach-Out: By executing her signature on the application, Vatterott College President Pamela Bell committed to the delivery of programs in Iowa, and agreed to provide alternatives for students to complete those programs at other institutions if Vatterott ceases the delivery of the program before students have completed their courses of study.

Student Complaints: Since March of 2013 when the institution was last registered, the Commission has received a total of five complaints about Vatterott College in Des Moines, summarized below:

August 2013: A student in the College's Associate of Occupational Studies (AOS) in Heating, Air Conditioning and Refrigeration Program complained that he was not receiving instruction outlined on his syllabi, particularly in relation to hands-on, laboratory work, and that an instructor in his program was not appropriately certified to teach the course, not capable of answering student questions, and disrespectful to students in a manner that escalated into public arguments. Vatterott College permitted the student to sign a new enrollment agreement for a diploma program and graduate with that credential since he had completed the requisite credits. The College wrote off all charges associated with the AOS program, thus settling any outstanding balance owed to the College. The College offered to provide the student with additional training relating to subjects covered in the AOS program free of charge and with an instructor other than the person that the student alleged to be incapable and disrespectful. While the College indicated that the instructor in question was qualified for his assignment, the College immediately increased the instructor's training and monitoring, which included mock teaching demonstrations of both classroom and lab presentations and mentoring by a veteran instructor. In addition, the College developed a lab hour tracking mechanism for instructors.

August 2013: Two students enrolled in a new Electrical Service Technician Diploma Program complained about the lack of instruction, the lack of hands-on, lab hours, and the lack of equipment necessary to complete tasks listed on course syllabi. The College contacted both students and offered them the option to withdraw and receive a full refund of all monies paid to date. The College also offered the opportunity to complete their education at the agreed cost, with the stipulation that the College would provide the students with every instructional and student service advantage, including tutoring, additional lab time, and enhanced career services assistance, free of charge, and including after graduation. The College had recently hired a new instructor in the program, and the students expressed their opinion that the current instructor was capable and knowledgeable. The students also acknowledged to the College that they observed equipment they needed to learn skills being delivered to the campus.

One of the students made it clear during this conversation that she wished to continue her education and graduate from the program. The second student later decided to withdraw, and the College fully refunded all monies he paid to the College to date. This student also felt he should be compensated for opportunity cost lost during his time of attendance. The College made an additional, undisclosed agreement with the student that took into account his additional request.

October 2013: A student complained about the quality of instruction in the Associate of Occupational Studies (AOS) in Heating, Air Conditioning and Refrigeration Program, including about the lack of hands-on, laboratory work. The student expressed dissatisfaction related to the same instructor as in the August 2013 complaint, and stated that he wanted to withdraw from the College. The College reported that this student was having satisfactory academic progress issues and questioned the student's statement about the scarcity of lab hours, particularly after it implemented the lab hour tracking system in August 2013. However, the College did not have documentation to substantiate the level of lab work provided during the student's prior period of attendance. The student abruptly withdrew from the College without notice and the College failed in various attempts it made to reach the student during late September and early October by phone, email and letter. Staff was also unsuccessful in making another contact with the student. The College dismissed the instructor about which this student and a prior student had complained.

April 2015: A former Des Moines campus employee complained that a prospective student came to the campus who requested disability accommodations and that campus administration indicated she would be enrolled despite the fact that the campus had yet to receive documentation of her disability to make a determination about whether she could be successful with reasonable accommodations. The former employee claimed that campus administration was primarily concerned about enrollment numbers and made a statement to that effect. Vatterott President Pam Bell supervised the College's response to this complaint. The College received disability documentation from the prospective student's physician, determined an academic plan for her that included reasonable accommodations that were agreeable to the student and the College, and admitted the prospective student into her desired program. The College committed to permit the student to progress through coursework in the program at no charge and award the student the appropriate educational credential if she successfully completed the program. Staff was unable to substantiate the former employee's claim that campus administration was primarily concerned about enrollment numbers.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Vatterott College submitted, with its registration renewal request that it has maintained the financial responsibility requirements of Iowa Code Section 714.18, including a continuous corporate surety bond payable to the State of Iowa in the amount of \$50,000, issued by Travelers Casualty and Surety Company of America, paid through March 15, 2017.

Section 714.23 – State Tuition Refund Policy

Vatterott College's tuition refund policy for students who withdraw from its Des Moines campus, and Iowa residents who withdraw from its online programs complies with the provisions of Iowa Code Section 714.23.

Compliance with Iowa Code Chapter 261F

Vatterott College maintains an Educational Code of Conduct that is compliant with Iowa Code Chapter 261F and publishes the Code of Conduct on its website at http://www.vatterott.edu/Documents/FA_docs/FA_Code_of_Conduct.pdf.

The College does not maintain a preferred lender list for private education loans and provides no information about private or alternative loans on its website. Financial aid staff are instructed to provide students with the option of in-school and out-of-school payments with no interest or fees to cover any remaining direct cost of education that is not paid by financial aid sources.