

IOWA COLLEGE STUDENT AID COMMISSION

Waldorf College Voluntary Registration Renewal Application April 15, 2016

STAFF ACTION:

Approve Waldorf College's voluntary application for postsecondary registration in Iowa for a two-year term that begins on March 16, 2015 and ends on March 16, 2017.

Registration Purpose

Waldorf College is presently exempt from registration in Iowa under Iowa Code Section 261B.11, subsection 1, paragraph "j", i.e., the College meets the institutional eligibility conditions for the Iowa Tuition Grant program and receives funding for its students from that program. However, the College wishes to maintain voluntary registration in Iowa to comply with federal regulations in 34 CFR 600.9. These federal regulations require a school participating in the federal student aid programs to be authorized to operate, by name, as a postsecondary educational institution by an action of the State in which the school is located. Waldorf's online programs are also acknowledged under its Iowa registration.

Institutional Information

Waldorf College is a for-profit institution located at 106 South Sixth Street, Forest City, Iowa. The College also maintains administrative offices to support its online programs at 21982 University Lane, Orange Beach, Alabama. The College's Chief Executive Officer is President Bob Alsop, Ph.D., at the Forest City, Iowa, address. The Chief Executive Officer of Waldorf's parent organization, Columbia Southern Education Group, is Robert Mayes, Jr., 21982 University Lane, Orange Beach, Alabama. Minnie L. Mayes, Robert G. Mayes, Jr., and Chantell M. Cooley are listed on the application as persons owning more than 10% of the school. Mrs. Cooley is also the CEO of Mayes Education, Inc. doing business as Waldorf College.

The legal governing body of the school is the President's Council led by Waldorf College President Bob Alsop, which provides leadership and management for daily operations. The Waldorf College President reports to a Board of Trustees, which provides comprehensive oversight of the College. The College provided a listing of the members of the President's Council and the College Board of Trustees. The College also maintains profiles of the members of its Board of Trustees on its website at <http://www.waldorf.edu/residential/about-us/trustees>. The majority of the President's Council is comprised of administrators in academic, business, admissions, marketing, student affairs, and athletic departments at the Forest City, Iowa, campus. While there are three members of the Board of Trustees that are associated with the College's parent company, Columbia Southern Education Group, the majority of Board and its

Chair appear to be public members with administrative, academic, and financial backgrounds and expertise. The Waldorf Board of Trustees maintains and publicly posts a Conflict of Interest policy <http://www.waldorf.edu/Residential/About-Us/Board/Conflict-of-Interest-Policy> that provides guidelines for Trustees having a relationship with any organization or person that involves a financial interest in, or holding of a position of authority with, any party conducting business with the College.

The designated state authorization contact person for Waldorf College is: Alexis Banks, Director of Licensure and State Authorization, at the Columbia Southern University. The Iowa based contact for student complaints regarding financial aid or tuition charges is: Linda Harms, Waldorf College Student Accounts Manager.

Physical Facilities: Waldorf College maintains its only campus in Forest City. A campus map and photographs available on the College's website at <http://www.waldorf.edu/Residential/About-Us/Campus-Map> indicates that current physical facilities are sufficient for the administrative, academic, co-curricular, and residential needs of its residential student body of more than 600 students. The College also maintains a television and radio station on its campus.

The College provides administrative support services for its online programs from offices located in both Orange Beach, Alabama and Forest City, Iowa, and provides contact information for these employees on their website at <http://www.waldorf.edu/online/about-us/staff>. These employees include: one director of online admissions and student services; two supervisors in online admissions and student services; six admission counselors; two admission processors; four student service representatives; two account specialists; four advisors; one records specialist; one assistant registrar; and one associate registrar who reports to the Waldorf College Registrar in Forest City, Iowa.

Waldorf College indicates that, for its online program students, there are no requirements to complete structured field experience or residencies. Waldorf's current online enrollment of Iowans is approximately 65 students.

Accreditation: The College is accredited by the Higher Learning Commission (HLC), a regional accrediting agency recognized by the Federal Department of Education.

Other Approvals: The Iowa Board of Education has approved Waldorf College's on-campus elementary and secondary teacher preparation programs for initial licensure in Iowa.

Federal Stafford Loan Cohort Default Rate (FFY 2012): 12.6%. For comparison purposes, the FFY 2012 national average cohort default rate is 11.8%.

Graduation Rate: 33%. 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: For students graduating in 2013, the average federal student loan debt for an associate's degree was \$10,235; for a bachelor's degree, the average federal student loan debt was \$10,577. Students graduating with federal and private loans had average debt of \$10,577 for an associate's degree and \$20,473 for a bachelor's degree.

Record Preservation: The Registrar's Office at the Waldorf College campus in Forest City, Iowa, maintains registration information for two years after a student leaves the College or graduates. Student transcripts are maintained permanently. Hard copies and electronic copies, since 1986, have been stored on-site at Waldorf College. Electronic copies of transcripts are also backed up on disks, which are stored off-site in a bank safety deposit box. Student Life maintains records, such as tuition and housing forms and receipts, for seven years after the student leaves the College or graduates. Financial Aid maintains student records for three to five years after a student leaves the College or graduates, with longer retention of records if needed for open items in an audit. Perkins loan student records are kept for seven years after the loan is paid off. Business Office records are kept for five to seven years after a student leaves the College or graduates.

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

Darrell Barbour, Registrar
Waldorf College Registrar's Office
106 South Sixth Street
Forest city, IA 50436
(641) 585-8139

A student may also make an online request for transcripts at:
<http://www.waldorf.edu/Residential/Academics/Registrar-s-Office/Request-a-Transcript>.

Instructional Methodology: The residential and online modalities are not of the same duration (16 week semesters in the residential programs versus 9 week terms in the online programs), but courses in both modalities are designed to be internally cohesive, with later units and assignments often building on previous work. Courses within programs are often designated as part of a sequence, with prerequisites.

The academic expectations are comparable across modalities, with students in the online versions of courses reading the same types of textbooks and completing the same types and numbers of graded assignments. Final exams in online courses require Waldorf-approved proctors (who verify student identity) or the use of a recognized proctoring software product.

Residential program instruction is delivered primarily through face-to-face, classroom instruction. Faculty uses a variety of instructional technologies that are integrated in the

face-to-face instruction to enhance student learning. Programs such as Communications and Theatre Arts include a practicum component in which students gain hands-on experience each semester through experiential learning in, for example, the college radio station or the Theatre Department. Elementary and secondary education programs include school field experiences throughout the curriculum in addition to the requisite student teaching practicum during the final semester of the program. Many programs include either an internship or a thesis as part of the curriculum. These experiences are designed to provide students with specialized experience in an interest area, either in the form of practitioner experience or research. Student interns have an on-site supervisor and faculty oversight. Programs that permit the option to conduct a thesis in lieu of an internship are humanities-related programs, such as English and History. The thesis provides students with the opportunity to gain in-depth research experience within a specialized topic of interest under the supervision of a professor. Generally, a residential student may register for a maximum of two online courses during a baccalaureate programs. Certain programs such as Organizational Leadership and Sport Management are offered in a blended format that provides a mix of residential and online courses. Waldorf also offers occasional international learning opportunities, typically during the summer semester.

Online program instruction is delivered over the internet asynchronously (Blackboard) within which students can interact with faculty (and other students) via Discussion Boards. Waldorf's email is also available for interactions between faculty and students outside of Blackboard. While some faculty also make telephone numbers available (those who teach from offices on campus) for real-time interactions, there is no expectation that faculty reveal personal phone contact information or mobile numbers that are not included with mobile phones issued by the college.

Student Learning Resources: The Luise V. Hanson Library is located on Waldorf's residential campus in Forest City, Iowa. The current \$4.5 million facility was built in 2005 through funding by the John K. and Luise V. Hanson Foundation as part of the college's centennial celebration. Students enrolled in Waldorf's online program access a collection of over 10,000 electronic books and thousands of full-text journals through the Waldorf Online Library website.

Reference services are provided by two professional librarians employed by Waldorf College. Librarians support online students primarily through phone consultations, but are also accessible via chat and email. Reference librarians provide online students with a growing collection of library guides <http://waldorf.libguides.com/>, tailored to meet the information needs of the online curriculum. Additionally, librarians instruct students in information literacy through a series of streamed webcasts, which are archived on the Online Library website at <http://www.waldorf.edu/residential/academics/luise-v-hanson-library>.

Waldorf provides an academic support services to online students via the Success Center <http://www.waldorf.edu/online/current-students/success-center>. The Success Center provides services to students that will aid in their academic success. The Success Center has personnel and resources readily available for students, regardless

of the degree they are seeking. The Center offers specialized academic tutoring, a writing and math center, and general course assistance. In addition, they provide the following services: assistance in the student's understanding of his or her personal learning style related to study skill techniques that will enhance academic success; assistance to students in finding academic resources; writing and APA citation style assistance, including grammar and paper organization; and guidance and assistance in math labs.

The Academic Achievement Center for Excellence (AAACE) provides academic services to all Waldorf College Students.

Waldorf Residential students have access to the following services:

- Tutorial services (also available to online students).
- Educational training and seminars.
- Learning style assessments.
- Academic advising (also available to online students).
- Study rooms.
- Computer network access.
- Printer access.
- [Academic Support Program](#).
- [Learning Disabilities Program](#).
- Academic Probation Program.

Waldorf College Online Students have access to the following services:

- [Disability Accommodations](#).

The Writing Center at Waldorf College is located on the 2nd floor of the [Luise V. Hanson Library](#) and exists to assist students throughout the writing process. Tutors are available to help with brainstorming, outlining, drafting, revising and proofreading strategies for writing assignments in any discipline, including helping with documentation of sources in research papers. For international students, tutors are also available for English conversation practice and writing support.

Waldorf provides advising services to their current students. Trained Waldorf College academic advisors are available to assist students with selecting the courses needed to successfully complete their desired program of study. These academic advisors possess a minimum of a master's degree, and are familiar with the academic requirements and career opportunities for the program in which they advise.

Academic advisors not only answer questions about courses, policies and procedures, but also encourage students to look to the future to formulate their educational and career goals. Each student is assigned and contacted by their academic advisor upon enrollment. Students are encouraged to contact their advisor when encountering any academic or life difficulties or before enrolling in a new course.

Waldorf provides career services to help current and former students obtain employment. The Career Center at Waldorf College is available to assist all current students and alumni with career exploration, resume and cover letter writing, job searches, interview preparation and graduate school information.

Curriculum Evaluation and Development: Online courses, alongside the parallel residential courses, encompass the same goals and learning outcomes, accountable to the same departments and working within a common assessment framework. The assessment process designed and implemented by Waldorf encompasses both the residential and online modalities, with the goal of continuous improvement within programs and courses. The learning outcomes in degree programs are appropriate and comparable to those found in programs in other institutions. All assessment processes at Waldorf—including student learning outcomes—are reviewed internally on a three year rotation and reported externally to accrediting agencies at the appropriate times (usually as part of a site visit connected with reaffirmation).

Waldorf, making use of the Columbia Southern Education Group (CSEG) Instructional Design and Technology (IDT) process for online course development and revision, follows the same process in approving any new courses and programs, regardless of modality, with a department sponsoring the course design, Faculty Senate providing initial acceptance and final approval coming from a vote at one of the monthly Faculty Meetings.

Academic Program Directors and department Faculty establish, direct, and oversee curriculum. Supported by a team of Instructional Systems Designers specialized in the development of instructional systems and interactive multimedia, Waldorf curriculum provides comprehensive academic programs evaluated annually to assess program level learning outcomes. Our approach is based on recognized academic standards, instructional design methodology, and includes benchmarking of successful accredited programs across multiple universities as a component of the three year academic program planning cycle.

New academic degree programs and curriculum under revision are extensively examined by Program Directors and their Faculty. This review process has recently been improved through utilization of a project management system which facilitates Faculty communication with curriculum teams.

Academic program objectives are determined and revised by professional academic staff working with faculty/subject matter experts and advisory board members to ensure comprehensive, balanced, and seamless learning goals are provided to students. They also identify the best methods of assessing student learning. When program analysis leads to the identification of a need for a new program or concentration, academic teams identify best practices and program standards from professional organizations and benchmark comparable institutions offering similar degrees.

The IDT Department formalizes syllabi documents with content provided by faculty and subject matter experts. The same process is applicable towards course sequence and degree planning development.

Student Complaints Process: The College disclosed its process for handling formal student complaints and provides information about that process to students in its Residential Student Handbook and, for online students, on its Online Degree Program web site:

- ✓ <http://www.waldorf.edu/Residential/Current-Students/Policies/Student-Handbook>.
- ✓ <http://www.waldorf.edu/Online/About-Us/Accreditation-and-Memberships/Registering-a-Complaint>.

All grievances should be addressed initially to the office/person involved in the dispute. When situations cannot be resolved at this level, the dispute should be taken to the supervising person or office. Students may contact the Dean of Students for assistance in resolving a grievance or obtaining information about the appropriate office or person with whom to discuss a grievance.

An online student who has been unable to resolve a dispute through discussion with the party involved may voice the concern in writing to the Assistance Dean for Online Learning. If the student is not satisfied with the Assistant Dean's response, the student may appeal the decision to the Waldorf Vice President of Academic Affairs.

Programs Offered in Iowa

Total estimated costs reflected below are tuition, fee, book, and supply charges for program completion in 2015-2016.

Associate Degree Program

- Liberal Arts - \$44,144.

Baccalaureate Degree Programs

- Biology - \$88,288.
- Business - \$88,288.
- Communications - \$88,288.
- Creative Writing - \$88,288.
- Criminal Justice- \$88,288.
- Criminal Justice Administration - \$88,288.
- Elementary or Secondary Education (licensure in Iowa) - \$88,288.
- Foundations of Education (non-licensure) - \$88,288.
- English - \$88,288.
- History - \$88,288.
- Organizational Leadership - \$88,288.
- Psychology - \$88,288.
- Sport Management - \$88,288.
- Theatre Arts - \$88,288.
- Wellness - \$88,288.

Programs Offered Via Distance Education

Total estimated costs reflected below are tuition, fee, book, and supply charges for program completion in 2015-2016.

The Waldorf Book Grant provides textbooks at no cost to online students who *successfully complete the course for which the text is provided*. Students who do not successfully complete a course through which a Book Grant is used will be responsible for the return or the cost of the course textbook(s).

Undergraduate Certificate Programs

- Communications - \$4,180.
- Diversity and Inclusion - \$4,180.
- Emergency Management- \$4,180.
- Global Leadership - \$4,180.
- Health Care Management - \$4,180.
- Homeland Security - \$4,180.
- Human Resource Management - \$4,180.
- Leadership Communication - \$4,180.
- Management - \$4,180.
- Occupational Safety and Health - \$4,180.
- Sport Management - \$4,180.

Associate Degree Programs

- Business Administration - \$16,595.
- Communications - \$16,595.
- Criminal Justice - \$16,595.
- Diversity and Inclusion - \$16,595.
- Emergency Management - \$16,595.
- Fire Science - \$16,595.
- Global Leadership - \$16,595.
- Health Care Management - \$16,595.
- Homeland Security - \$16,595.
- Human Resource Management - \$16,595.
- Leadership Communication - \$16,595.
- Liberal Arts - \$16,595.
- Management - \$16,595.
- Occupational Safety and Health - \$16,595.
- Psychology - \$16,595.
- Sport Management - \$16,595.

Baccalaureate Degree Programs

- Business Administration - \$33,095.
- Communications - \$33,095.
- Criminal Justice - \$33,095.

- Criminal Justice Administration - \$33,095.
- Emergency Management - \$33,095.
- Fire Science Administration - \$33,095.
- Health Care Management - \$33,095.
- Homeland Security - \$33,095.
- Occupational Safety- \$33,095.
- Organizational Leadership - \$33,095.
- Psychology - \$33,095.

Master's Degree Programs

- Organizational Leadership - \$12,695.

Registration Compliance

As required by Iowa Code Section 261B.4, Waldorf College disclosed its policy on refunding tuition charges for withdrawn students. The policy is disclosed to residential and online students in its respective and online program catalog addenda at <http://www.waldorf.edu/Download-Information>.

Since Waldorf College is a for-profit institution, its tuition refund policy for withdrawn students must comply with the provisions of Iowa Code Section 714.23. The College maintains a compliant policy for both its residential and online students. For additional information, see *Section 714.23 – State Tuition Refund Policy*, below.

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. Waldorf College maintains these policies and discloses them to students on its web site at:

- ✓ [Substance Abuse Policy](#).
- ✓ <http://www.waldorf.edu/Residential/Current-Students/Health-and-Safety/Sexual-Assault-Policy>.

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.

Waldorf maintains this policy and discloses it to residential and online students in its online programs catalogs. These can be found at:

- ✓ <http://www.waldorf.edu/download-information>.
- ✓ http://www.waldorf.edu/downloads/pdf/academics/addendum/addendum_catalog_residential_military_deployment.

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. This policy is provided to the staff at Waldorf in the employee handbook which is available online at:

- ✓ <http://www.waldorf.edu/downloads/pdf/employment/waldorf-college-employee-handbook-2014>.

Student Consumer Information: In its registration application, Waldorf 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. Waldorf College discloses this information in its residential and online program catalogs at:

- ✓ <http://www.waldorf.edu/Download-Information>.

Waldorf College affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7. Effective July 1, 2012, these provisions of Iowa Code were modified to state that, provided the school does not claim "approval" or "accreditation," the school must disclose to students that it is registered by the Commission and provide Commission contact information for students who have questions or complaints about the school. The College currently discloses its registration with the Commission and contact information for student complaints at:

- ✓ <http://www.waldorf.edu/Residential/About-Us/Accreditation-and-Memberships/State-Licensure>.

Financial Responsibility: Waldorf College submitted an audit report dated May 27, 2015, for Mayes Education, Inc. doing business as Waldorf College, for the fiscal year ending December 31, 2014, conducted by the independent auditing firm Weworski & Associates. The auditing firm expressed its opinion that the organization's financial statements present fairly, in all material respects, Waldorf's financial position.

A private for-profit school that participates in the federal student aid programs must maintain a composite score, based on a three-factor financial responsibility ratio, of at least 1.5 in order to be determined financially responsible without additional oversight. The independent auditing firm that did not report or test a composite score for Waldorf College. The most recent composite score available from the federal Department of

Education is for the College's parent, Columbia Southern University: 3.0 out of a possible, maximum score of 3.0.

The federal Department of Education restricts the portion of a for-profit institution's income that may be derived from federal student aid funding to 90%. The independent auditors tested the 90/10 ratio for Waldorf College and reported that the percentage of revenue the College earned from Title IV aid during the fiscal year that ended on December 31, 2014 was 68.52%.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Waldorf College employs approximately 43 full-time residential faculty listed at <http://www.waldorf.edu/Residential/About-Us/Directory>. Waldorf has a total of 98 full- and part-time Iowa faculty members, staff, and administrators.

Instructional/Supervisory Staff Qualifications: Staff reviewed approximately 45 vitae posted on the College's website for its Assistant, Associate, and full Professors <http://www.waldorf.edu/residential/about-us/directory>. All appear to have educational and/or experiential qualifications for their assignments. The majority of faculty has terminal degrees. Of those with graduate degrees, all have a significant history of teaching and/or other pertinent, professional experience.

Commitment to Iowa Students and Teach-Out: By executing an electronic signature on the registration application, Waldorf President Bob Alsop committed to the delivery of programs Waldorf offers and agreed to provide alternatives for students to complete programs at Waldorf or another school if the University closes a program, or if Waldorf closes before students have completed their courses of study.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Staff approved the College's financial responsibility application, which includes a continuous corporate surety bond payable to the State of Iowa in the amount of \$50,000, issued by Merchants Bonding Company (Mutual) effective through January 3, 2017.

Section 714.23 – State Tuition Refund Policy

Waldorf College implements a tuition refund policy that complies with Iowa Code Section 714.23. For both residential and online students, the tuition refund formula that Waldorf adopted applies to all of its students regardless of whether they are Iowa residents. Its policy for residential students provides a greater tuition refund than required by Iowa Code.

Chapter 261F - Educational Loan Code of Conduct and Preferred Lender Arrangements

Waldorf College complies with Iowa Code Chapter 261F by posting on its website an education loan Code of Conduct for its employees at: http://www.waldorf.edu/residential/future-students/tuition-financing/financial-aid/institutional-code-of-conduct-for-education_loans#Preferred_Lender_Arrangements.

Iowa Code Chapter 261F also stipulates certain conditions that must be met by a covered institution (i.e., a state or federal student aid recipient such as Waldorf College) that participates in a preferred lender arrangement. A preferred lender arrangement under Iowa Code means an arrangement or agreement between a lender and a covered institution under which the lender provides or otherwise issues educational loans to borrowers and which relates to the covered institution recommending, promoting, or endorsing the educational loan product of the lender. Waldorf College does not maintain a list of preferred lenders. However, the financial aid office at the College does refer students to a list of lenders that Waldorf College students have used in the past, commonly known as a “historical lender list.” Under federal Department of Education guidance, an institution is not considered to be participating in a preferred lender arrangement if it provides borrowers with a neutral, *comprehensive* list of private education lenders that have previously made loans for attendance at a school within a specified time period. Such a list must be accompanied by a statement that the borrower may choose any lender. A historical lender list is an acceptable alternative to provide students with information about lending options and that it is not considered a preferred lender list under Iowa Code Section 261F, provided the school complies with the federal Department of Education’s guidance on the use of such a list.