

IOWA COLLEGE STUDENT AID COMMISSION

Carlson College of Massage Therapy Application for Postsecondary Registration October 4, 2016

STAFF ACTION: Approve Carlson College of Massage Therapy's voluntary application for registration in Iowa for a consecutive term that begins on October 4, 2016 through October 4, 2018.

Registration Purpose

Carlson College of Massage Therapy (Carlson College or the College) is currently eligible for an exemption from registration in Iowa Code § 261B.11(1)(m): "Higher education institutions located in Iowa whose massage therapy curriculum is approved under administrative rules of the professional licensure division of the department of public health and whose instructors are licensed massage therapists under chapter 152C." Thus, the College is not required to register with the Commission under Iowa law. However, Carlson College voluntarily requests registration renewal in Iowa in order to comply with federal regulations in 34 CFR § 600.9, which require a school located in a State to be authorized through an action of that State as a condition of participation in the federal student aid programs.

Institutional Information

Carlson College of Massage Therapy is a private, for-profit educational institution whose campus is located at 11809 County Road X28, Anamosa, Iowa 52205. The College's Chief Executive Officer is President Christina Rider, same location. The College is registered with the Iowa Secretary of State as a domestic for-profit under business number 184425. The registered agent is President, Christina Rider.

Current Ownership and Governance: The College was founded in 1984 by Ruth Carlson. In 2008, the College was purchased by current President and co-owner Christina Rider. The College does have a co-owner, Karen Eichler. In addition to having sole ownership and control of the College, Ms. Rider fulfills an instructional and operational role, and Ms. Eichler's role includes operational leadership.

Physical Facilities: The College is housed in a commercial building on six acres of land in Stone City, Iowa. The College moved to this location in 1994. The physical environment consists of a main office, a faculty office and kitchen, a student library, a student locker/auxiliary classroom, a large classroom with attached storage, three private changing rooms, a second classroom, a student lounge and kitchen, storage rooms, and four bathrooms. The property is leased from its owner, KC Country Properties, LLC. The College provided a current copy of the lease agreement, which remains valid until December 31, 2022.

Accreditation: The College is accredited by the Commission on Massage Therapy Accreditation. The Commission on Massage Therapy Accreditation is recognized by the United States Department of Education as a specialized institutional accrediting agency.

Carlson College of Massage Therapy is the only stand-alone, postsecondary massage therapy school in the State of Iowa that is accredited by an accrediting agency recognized by the federal Department of Education.

The College also maintains current (as of July 1, 2016) program approval from the Iowa Board of Massage Therapy.

Federal Stafford Loan Cohort Default Rate (FFY 2012): 6.2%. 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. The College's graduation rate is 100%, as verified by the College Navigator, a division of the National Center of Education Statistics.

Average Loan Debt upon Graduation: \$5,206.

Record Preservation: Students records are reviewed twice for accuracy prior to being entered into a student's file. Current student and graduate files are secured in a locked, fireproof cabinet. The information is password protected and only accessible by appropriate school personnel. Two portable hard drives are utilized as back up for student information, stored off school premises in a locked cabinet.

Transcript Requests: Anyone wishing to access student files must sign a written release accompanied by the student's approval and signature. Transcripts are released only through the request of the student, graduate or student representative, if applicable and released only in sealed envelopes. All requests must be made by completing the FERPA form which is available through the College's website at <http://www.carlsoncollege.com/ferpa.html> or the student may make an official transcript request through the College's Office Manager.

Instructional Methodology: All classes are taught in a classroom where student attendance is mandatory. The College does not currently offer any correspondence, internet, telecommunication, independent study, or portfolio experience evaluation in lieu of the classroom instruction. Instructors are allowed to adjust their teaching methods to meet the needs of the current students. Carlson provides various materials that instructors can choose from for best teaching practices. Some of these materials include: skeletal models, clay manikin models, computers, projection units, and video monitors.

Student Learning Resources: The College maintains a library available to students during school hours, and by appointment outside school hours. The library includes textbooks, reference books, educational and technique videos, workbooks, magazines, and charts. All student library materials are available on a lending basis for students to take home if needed. The College does maintain a faculty library which students are able to use, however; materials from the faculty library cannot leave the premises.

Curriculum Evaluation and Development: Each instructor is encouraged to use their person methods for the best results in teaching. Instructors are allowed to adjust the teaching

methods used in accordance to student responses. Instructors are expected to contact the College's administrative staff regarding any variations.

A class instructor may act upon a minor revision, such as changing an evaluation tool. A major curriculum revision must be brought to the attention of the President, who then begins the approval process. Administrators discuss any proposed major curriculum revisions and come to a mutual decision. Implementation is brought about by the entirety of the Colleges staff and faculty.

Student Complaints Process: The College maintains a process for filing complaints and discloses that process in its hard copy Student Handbook. That process is:

- Speak directly to the supervising instructor or other party involved.
- Speak to either the President or Vice President.
- Prepare a written complaint form and deliver it to the Office Manager, who will deliver copies to the school President and place a copy in the student's file.
- Meet with Vice President.
- Meet with President.
- If the student feels that the complaint is unable to be resolved by the College, the student may contact the College's accrediting agency, the Commission on Massage Therapy Accreditation.

All written complaints will receive a response from the President within five business days.

Carlson College will provide additional information in its Student Handbook about the student's opportunity to contact the Commission, as follows:

If the student feels the complaint is not resolved by CCMT, they may contact the Iowa College Student Aid Commission

Toll Free Telephone: 877 272 4456

Online student complaint form: <https://www.iowacollegeaid.gov/sdrf-start>

Programs Offered In Iowa

The College offers only massage therapy programs in two different formats: full time and part time. The full-time program consists of 775 hours; the part-time program consists of 700 hours. The total estimated costs for each of the programs are:

- Part-time: \$8,400
- Full-time: \$8,925

Registration Compliance

As required by Iowa Code Section 261B.4, the College submitted a policy for refunding tuition charges to withdrawn students. Since Carlson College of Massage Therapy is a for-profit institution, its tuition refund policy must comply with Iowa Code Section 714.23. Staff determined that the College's policy is compliant. The College discloses its tuition refund policy in its student Enrollment Agreement and in its hard copy Student Handbook.

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

- Iowa Code Section 261.9(1)(e) requires a school to maintain and disseminate a drug and alcohol abuse policy that includes sanctions for violation of the school's policy and information about the availability of drug or alcohol counseling or rehabilitation. Iowa Code Section 261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that includes information about counseling opportunities and reporting instances of sexual abuse to school officials and law enforcement. These requirements duplicate policies and disclosures required by the federal Department of Education for a school that participates in the federal student aid programs. The College maintains a compliant policy in its Student Handbooks and Enrollment Agreement. This information is also accessible on the College's website at <http://www.carlsoncollege.com/consumer-information.html>, under Campus Security Report.
- Iowa Code Section 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. The College submitted a compliant policy in conjunction with its registration application and discloses the policy in its student Enrollment Agreement.
- Iowa Code Section 261.9(1)(h) requires a school to develop and implement a policy for employees who, in the course of their employment, attend, examine, counsel, or treat a child and who suspect the physical or sexual abuse of that child. By cross-reference from existing administrative rules for registration [283-21.2(261B), subsection 7], this policy applies to Iowa's registered schools who compensate one or more parties to conduct instruction or other operational activities on the school's behalf at an Iowa location. The College submitted a compliant policy in conjunction with its registration application. This policy is disclosed to employees in the College's hard copy Faculty and Staff Handbook, which is reviewed with each new employee during orientation.

Student Consumer Information: In its registration application, the College affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. 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. The College provides this information to prospective students in its Enrollment Agreement. This information is also accessible on the College's website under the Consumer Information link <http://www.carlsoncollege.com/consumer-information.html>.

The College affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7. These provisions of Iowa Code state that, provided the school does not claim "approval" or "accreditation," the school must disclose to students that it is registered by the Commission and disclose Commission contact information for students who have questions or complaints about the school. The College will disclose this information to its students upon approval of registration with the Commission. The College will disclose this

information in its Enrollment Agreement as well as on its website. The contact information for the Commission will be disclosed in the College's hard copy Student Handbook where it is easily accessible to students.

Financial Responsibility: The College provided a copy of an independent audit of the corporation's fiscal years ending June 30, 2014 and 2013. The audit was conducted by the independent auditing firm Knutte & Associates, P.C. The auditing firm expressed its opinion that the corporation's financial statements presented fairly, in all material respects, the financial position of the College.

- A nonpublic school that participates in the federal student aid programs must maintain a composite score, based on a three-factor financial responsibility ratio, of at least 1.5 in order to be determined financially responsible without additional oversight. The most recently published composite score verified by the federal Department of Education for the College is 3.0 (out of a possible 3.0) for the school's fiscal year that ended December 31, 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 (also known as a "90/10" ratio). The most recently published 90/10 ratio verified by the federal Department of Education for the College is 61.74%, for the institutional fiscal year that ended December 31, 2013.

Full-Time Iowa Resident Faculty Member or Program Coordinator: The College maintains five office personnel, two of which provide instruction in addition to operation support.

Instructional Staff Qualifications: The College has ten faculty members who provide instruction to its students. Two of those faculty members are the President and Vice President of the College. Five of the ten faculty members assist with specific types of massage. All ten faculty members are licensed massage therapists. Two of the 10 instructors hold baccalaureate degrees. One of those two instructors has over 30 years' experience in teaching, while the other has been with the College since 1993.

Commitment to Iowa Students and Teach-Out: By executing her signature on the application, the Carlson College of Massage Therapy President, Christina Rider, commits to the delivery of programs in Iowa, and agrees to provide alternatives for students to complete programs at the campus or another school if the College closes a program or the campus closes.

Student Complaints: None.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Carlson College of Massage Therapy has filed satisfactory evidence of financial responsibility under Iowa Code Section 714.18, including a continuous corporate surety bond in the amount of \$50,000 payable to the State of Iowa and issued by Nationwide Mutual Insurance Company effective through September 19, 2017.

Section 714.23 – State Tuition Refund Policy

Carlson College of Massage Therapy maintains a compliant tuition refund policy for students who withdraw from its campus, and discloses this policy to students in its Enrollment Agreement.

Compliance with Iowa Code Chapter 261F

Preferred Lender List: The College does not maintain a list of specific private education loan lenders. The College discloses options to students on its website in regard to options for payment of tuition. The College provides students with resources and links to federal aid options, including federal loans. The College does offer an in-house payment plan to students. This plan enables students to pay tuition as they are attending the program.

Student Loan Code of Conduct: Students may review Carlson College of Massage Therapy's Student Loan Code of Conduct in the College's Student Consumer Information disclosures at <http://www.carlsoncollege.com/consumer-information.html>, accessible under Title IV Code of Conduct Policy. Staff reviewed the College's Code of Conduct and determined that it is compliant with Iowa Code Chapter 261F.