

IOWA COLLEGE STUDENT AID COMMISSION

The George Washington University Application for Postsecondary Registration in Iowa November 2014

STAFF ACTION:

Approve The George Washington University's application for postsecondary registration in Iowa for a two-year term beginning on November 24, 2014, and ending on November 24, 2016.

As a condition of registration, the University must notify Commission staff of the location at which an Iowa resident will participate in a field experience within 90 days of the University's approval of a new field experience site.

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. Staff required The George Washington University (GWU) to apply for registration to offer distance education programs to Iowa residents because the University offers a fully "at a distance" education program including a structured field experience that an Iowa resident would participate in at an Iowa location.

Institutional Information

The George Washington University is a non-profit educational institution located at 2121 Eye St. NW, Washington, DC. The Chief Executive Officer is Steven Knapp, 2121 Eye Street NW, Suite 801, Washington, DC. GWU is registered with the Iowa Secretary of State's office as a foreign nonprofit corporation #455046. Its Iowa resident agent is Corporation Service Company, 505 5th Ave., Suite 729, Des Moines, Iowa 50309.

Physical Facilities: Not applicable for a distance education program provider.

Accreditation: GWU is accredited by the Middle States Commission on Higher Education, a regional accrediting agency recognized by the federal Department of Education. The University also holds special programmatic accreditation for certain distance education programs. These accrediting agencies are also recognized by the federal Department of Education for accreditation in a specific subject matter:

- Council on Education for Public Health.
- Commission on Collegiate Nursing Education.
- National Council for Accreditation of Teacher Education.

Federal Stafford Loan Cohort Default Rate (FFY 2011): 1%

For comparison purposes, the FFY 2011 national average cohort default rate is 10%.

Graduation Rate: 81%. 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: \$33,398 (institution wide)

Record Preservation: In accordance with the District of Columbia Municipal Regulations, in case of institutional closure, student records will be deposited with and maintained by the Educational Licensure Commission of the Office of the State Superintendent of Education of the District of Columbia. The Education Licensure Commission (ELC) is the default repository for academic records of institutions in the District of Columbia that go out of business and make no other arrangements for maintaining their records. All issuances are certified copies of records as they appear in the Office of the Registrar upon the school's closing.

GWU maintains a Records Management Policy that addresses operational needs and legal requirements for record retention and privacy protection, optimizing the use of space, minimizing the cost of record retention, and properly disposing of outdated records. This policy applies to all records, regardless of whether they are maintained in paper, electronically, or in some other fashion.

Schools and divisions that maintain University records are responsible for establishing appropriate records management procedures. The Office of the Senior Vice President and General Counsel ("OGC"), the Division of Information Technology ("DIT"), and the Compliance and Privacy Office shall provide standards to schools and divisions for drafting appropriate procedures.

In general, each school's and division's procedures and practices must include, at minimum, the following considerations:

- Any record that contains nonpublic data should be treated in accordance with the University's privacy and security policies.
- All University records, regardless of whether they are maintained in paper, electronically or in some other fashion should be covered by the procedures and practices.
- Any record that is relevant to any pending or anticipated litigation, claim, audit, agency charge, investigation or enforcement action shall be retained at least until final resolution of the matter. OGC will provide guidance on storage or destruction of any documents related to pending or anticipated litigation.

Each school and division must have its records management procedures approved and reviewed by the Compliance and Privacy Office in collaboration with OGC and DIT.

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

Elizabeth Amundson
800 21st St. NW
Washington, DC 20052

(202) 994-4900

<http://registrar.gwu.edu/transcripts>

Instructional Methodology: Distance education only. Students will master course materials on their own timetables and interact with faculty and classmates in weekly, live, online sessions. Asynchronous course content will cover materials taught in a typical lecture. These sessions will include original, broadcast-quality video segments, self-paced lectures, interactive case studies and collaborative activities designed to foster teamwork. Students will have access to content 24 hours a days, seven days a week. In live, or synchronous class sessions, a professor and a cohort of 10-15 students will collaborate in an online classroom at prearranged dates and times. These sessions, scheduled to accommodate students in multiple time zones, will use live, streaming video to allow students and professor to see and hear each other as they analyze and discuss course content. The technology also will enable live office hours with professors and student-led study groups, all of which will be recorded so students can revisit them, even after they complete the courses. In addition, faculty and students will be able to interact through the learning management system via mechanisms such as discussion boards and group discussions.

Student Learning Resources: The Gelman Library at George Washington University provides online students with access to a searchable catalog, reference works, research guides, subject databases, articles, journals, and RefWorks, a tool for managing citations and creating bibliographies. Databases include ArticlesPlus, ProQuest, ProQuest Research Library, Academic Sear Complete, JSTOR, WorldCat, Lexis Nexis Academic, Web of Science, ABI/Inform, PsycINFO, and Project Muse. Research guides are available by discipline in approximately 30 topics, including writing style, citation guides, and course guides. Students may request books and articles that cannot be found in the University catalog or online by using interlibrary loan.

Special collections accessible through the Gelman Library include the Global Resources Center and National Security Archive. The Global Resources Center offers a compilation of print, electronic, and digital resources including the content of English and foreign-language newspapers, journals, magazines, statistical publications, maps, atlases, U.S. and foreign government documents and other primary resource material. The Global Resources Center includes five specialized collections: the China Documentation Center; Japan Resource Center; Taiwan Resource Center; Resource Center for Russia, Eurasia, Eastern and Central Europe; and the Middle East and North Africa Resource Center. The National Security Archive combines a unique range of functions including an investigative journalism center, a research institute on international affairs, a library of declassified U.S. documents and information obtained from the U.S. Freedom of Information Act requests.

The Library provides an online tool called "How Do I?" that contains step-by-step tutorials about accessing multiple library resources. Librarians can participate in discussion board interaction about research topics, processes, and sources. Students may request assistance through "Ask a Librarian" through live chat, text, email, or telephone (not toll-free). Answers to questions submitted via email are answered within 24 hours, with the exception of questions submitted on the weekend, which are answered on Monday. A student may also set up a scheduled appointment for research consultation.

Curriculum Evaluation and Development: The regular, active-status faculty members of the rank of assistant professor and higher of each school establish procedures for their participation, directly or through elected standing committees, in decisions relating to the addition, revision, or elimination of curricular offerings. In the College of Professional Studies, the Dean's Council shall establish procedures for faculty participation in such decisions. At least half of the members of the Dean's

Council of the College of Professional Studies must be tenured faculty members of the schools affected most directly by the College, and those members of the Dean's Council must be elected by the faculty members of their respective schools. The College of Professional Studies must not initiate a degree program that duplicates a degree program offered by another school. The College must not initiate a degree program that overlaps substantially with a degree program offered by another school, unless (a) the Dean's Council of the College has approved that program, and (b) the appropriate corporate officer of the University has authorized the College to initiate that program after consulting with the faculty of the other school. Prior to the end of each academic year, the Dean's Council of the College of Professional Studies submits a written report to the Faculty Senate. Each annual report describes the procedures established and other actions taken by the Dean's Council to: (a) facilitate faculty participation in the appointment and promotion of faculty members and in decisions relating to the addition, revision or elimination of curricular offerings of the College; and (b) address issues arising out of potential substantial overlaps between degree programs offered or proposed to be offered by the College and degree programs offered by other schools.

All new courses or changes to existing courses must be submitted through the [CourseLeaf Course Inventory Management \(CIM\)](#) system. Once all information is entered into CourseLeaf CIM, the proposal will proceed through a school-specific approval chain, which includes the following:

- Submitter of the proposed change
- Department Chair or Program Director
- Dean (Academic Dean, Associate Dean)
- Academic Editor
- Associate Vice Provost for Academic Planning and Assessment
- Registrar
- Academic Scheduling
- University Librarian (if the program is new)
- Office of Teaching and Learning
- Student Accounts (if new fees are included)

At the end of the approval chain, the program submitter, the Department Chair or Program Director, and the Dean will all receive a notification indicating that the proposal has been fully approved.

Student Complaints Process: The University's formal student complaint process is located in its Guide to Student Rights and Responsibilities at <https://studentconduct.gwu.edu/sites/studentconduct.gwu.edu/files/downloads/Guide%20to%20Student%20Rights%202011-2012%20-%20Final.pdf>. In addition, the University's Vice Provost for Online Education and Academic Innovation provides online students with his personal email for the purpose of contacting him and the University's Office of Online Education and Innovation staff to raise any issues or complaints directly.

Programs Offered In Iowa

A complete list of the distance education programs the University offers, and their total estimated costs, is included as a separate attachment to this report entitled "Authorized Programs."

Field Experiences:

- Students in the Master of Science in Political Management program must participate in a three credit-hour field experience at an organization focused on applied politics.
- Students in the Master of Science in Paralegal Studies program must complete a practicum of three credit hours in a law firm or similar legal setting.
- Students in the Master of Public Health program must complete a practicum of three credit hours in a public health or related setting that addresses significant public health or health services problems. The student is supervised by an experienced public health or similar professional.

Registration Compliance

As required by Iowa Code Section 261B.4, the University discloses its policy on refunding tuition charges for withdrawn students. The terms of the University's refund policy are not dictated by the provisions of Iowa Code because it is a non-profit institution.

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. GWU maintains drug and alcohol prevention policies, penalties for drug/alcohol violations, sexual harassment or physical abuse, and information about sexual assault intervention in the following resources and publications:
 - ✓ The Center for Alcohol and other Drug Education, a Division of Student Affairs <http://students.gwu.edu/center-alcohol-and-other-drug-education>.
 - ✓ The Code of Student Conduct <https://studentconduct.gwu.edu/code-student-conduct>.
 - ✓ The Sexual Assault Response Consultative (SARC) team <http://police.gwu.edu/sexual-assault>.
 - ✓ The University's Annual Security and Fire Safety Report http://www2.gwu.edu/~newsctr/MCS_Publications/GW_Safety_report_v4/index.html.
 - ✓ The University Bulletin at <http://bulletin.gwu.edu/pdf/2014-15.pdf>.
- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy concerning institutional charges for members of the Iowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member has been called to active (Iowa) state or federal military duty or service. The University provided a compliant policy with its registration application and written assurances from the Vice Provost for Online Education and Academic Innovation that the policy will be applied to all Iowa-resident online program students. GWU will disclose the Iowa military deployment tuition refund policy on its public, distance learning Legal web page.
- Iowa Senate File 2225 created a new Iowa Code Section 261.9(1)(h). This new law, generally effective July 1, 2012, requires a school to develop and implement a policy for employees who, in the course of their employment, attend, examine, counsel, or treat a child and who suspect

the physical or sexual abuse of that child. By cross-reference from existing administrative rules for registration [283-21.2(261B), subsection 7], this new policy now applies to Iowa's registered schools who compensate one or more parties to conduct instruction or other operational activities on the school's behalf at an Iowa location. At this time, George Washington University has no Iowa-based employees or contractors. Thus, it is exempted from the implementation of this policy per administrative rule changes effective January 15, 2014. However, the University maintains a Protection of Minors policy that applies to all members of the University community, on and off campus, and requires reporting to the University as well as to law enforcement in cases of emergency or imminent threat.

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 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 University provides this information to prospective undergraduate and graduate students in its Bulletin at <http://bulletin.gwu.edu/pdf/2014-15.pdf>.

GWU 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 University discloses this information on its Online Learning Legal page at <http://online.gwu.edu/contact-information-student-complaint-processes>.

Financial Responsibility: GWU submitted a copy of an independent financial audit conducted by PricewaterhouseCoopers, LLP, for the institution fiscal years ending June 30, 2011 and 2012. The auditing firm expressed its opinion that the corporation's financial statements presented fairly, in all material respects, the financial position of the University.

- 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 recent composite score reported by the federal Department of Education for GWU is 3.0 (out of a possible maximum score of 3.0).

Full-Time Iowa Resident Faculty Member or Program Coordinator: GWU uses its campus-based faculty to provide instruction in its online programs and has no plans to hire Iowa residents to teach remotely for the University. Per administrative rule changes that are effective January 15, 2014, a school that applies solely to provide distance education programs to Iowa residents is not required to have a full-time Iowa-resident faculty member or program coordinator.

Instructional/Supervisory Staff Qualifications: Staff reviewed faculty profiles posted on the University website for the University's departments that will offer online programs to Iowa residents:

- Clinical Laboratory Sciences: Of 14 profiles reviewed, 10 have doctoral degrees, including two medical doctors. The remaining four faculty members have a master's degree in a laboratory

science-related field or education. Experience among these faculty members includes microbiology, bio-threat agents, molecular diagnostics, genetics, tuberculosis, MRSA, infectious diseases, urinalysis, education, and teaching.

- Education: Of five profiles reviewed, all five hold terminal degrees. Expertise among these faculty members includes instructional technology, digital portfolios, curriculum development, special education, bi-lingual education, teacher training, and children with behavioral disorders or emotional disturbances.
- Health Sciences Research, Quality & Regulatory Affairs: Of 31 profiles reviewed, 17 faculty members have doctoral degrees in the health and clinical sciences, research, law, or education. The remaining 14 have master's degrees. Expertise among these faculty members includes clinical research and auditing, clinical leadership, nursing practice and research, international training, pharmaceuticals, bioethics, biostatistics, regulatory compliance, clinical trials, investigational drugs, global program management, managed health care, biomedical science, vaccine development, antivirals, molecular diagnostics, nutritional science, health sciences information management, radiation therapy, public health, leadership development, organizational development, emergency health services, physical therapy and rehabilitation, and ergonomics.
- Landscape Design: Of 17 profiles reviewed, one faculty member holds a doctoral degree, another has a post-master's specialist certificate in curriculum and instruction, and the remaining faculty members have master's degrees. Many of these faculty members are owners of their own landscape businesses or are independent landscape designers or architects.
- Museum Studies: Of three profiles reviewed, one faculty member has a doctoral degree in law and the remaining two faculty members have a master's degree in art conservation and collections management. Experience among these faculty members includes work at the Smithsonian, membership on the Board of Directors of the Washington Conservation Guild, leadership in the practice of law as it relates to the fields of art, entertainment, and museums, museum leadership, museum curatorship, and archives management.
- Nursing: Three profiles were found for faculty members who teach in the baccalaureate nursing degree programs at GWU. All three faculty members have a doctoral degree in a nursing-related field. Experience among these faculty members includes areas such as emergency, shock-trauma, flight nursing, medical-surgical nursing, neurological ICU, community/public health nursing, crisis intervention psychiatric/mental health nursing, children and adolescents with anxiety disorders, depression, developmental disorders, and brain injury, cancer, and postsecondary faculty, department head and school of nursing Dean.
- Paralegal: Of 16 profiles reviewed, all but two faculty members have a doctoral degree in law. The remaining two faculty members have a total of three master's degrees in legal administration, paralegal studies, and liberal studies with a specialization in conflict management and resolution. Expertise among these faculty members includes intellectual property, government contracts, national security, energy and environmental law, financial services, business transactions, technology transfer, regulatory advocacy at the state and federal levels, policy advisement, corporate management, corporate legal representation, ethics, conflict management and resolution, and paralegal staff management at a large law firm.
- Police and Security Studies: Of 8 profiles reviewed, two faculty members hold a doctoral degree in criminology or law. The remaining faculty members hold a master's degree in criminology, management, homeland security, history, or social policy. Two faculty members are graduates of the FBI National Academy in Quantico, Virginia. Experience among these faculty members includes leadership positions in law enforcement, law enforcement training, homeland security, private security, strategic services, and experience with the U.S. Army as a Judge Advocate General, with the Department of Justice and the District of Columbia Metropolitan Police.

- **Political management:** Of 31 profiles reviewed, eight faculty members have doctoral degrees. Nineteen have master's degrees in political management. The remaining four faculty members have baccalaureate degrees as well as significant experience in the political arena. Expertise among all of the political management faculty members includes strategic communications and advertising, media analysis, political forecasting, political polling, journalism, public relations, political marketing, social media, lobbying, fund-raising, technology, international advocacy, nonprofit advocacy, public and nonprofit organizational management, international politics. Several faculty members have been or are an elected public official, or a political strategist or media consultant for persons that have campaigned for local, state, or federal offices including gubernatorial and presidential candidates.
- **Public Health:** Of 12 profiles reviewed, all 12 faculty members have a doctoral degree. Two faculty members are medical doctors. Several received their graduate or terminal degree from Johns Hopkins University. One faculty member was a post-doctoral scholar at Harvard School of Public Health. Another faculty members was the executive director of the Harvard Center for Risk Analysis and a faculty member at the Harvard School of Public Health. Expertise among these faculty members includes the global HIV epidemic, population health in Africa, reproductive health, child and adolescent development and health, public health risk analysis, toxicology, nanotechnology, human genetics, emerging infectious diseases, exercise science and nutrition, international health care systems, organizational behavior and change management, health care policy, and innovative public education.
- **Publishing:** Of 25 profiles reviewed, four faculty members have a doctoral degree, 14 have a master's degree and seven have a baccalaureate degree. Educational and experiential qualifications among these faculty includes law, journalism, publishing including electronic publications, finance/accounting, management, computer sciences, public policy, and library science. The seven faculty members who do not have a graduate-level degree have notable professional experience, as follows:
 - ✓ Director of Marketing and Online Book Publishing, Johns Hopkins University Press
 - ✓ Subsidiary Rights Manager, National Geographic Society
 - ✓ Deputy Head and Sales/Marketing Manager, Washington Center
 - ✓ President, Production Matters
 - ✓ International Publishing Consultant,
 - ✓ Deputy Executive Director, Office of Communications, National Academies
 - ✓ Deputy Executive director and Director of Publications, American Geophysical Union
- **Strategic Public Relations:** Of 14 profiles reviewed, three faculty members have a doctoral degree and the remainder hold a master's degree in management, journalism, public administration, or business administration. Expertise among these faculty members includes communications and public relations for politicians and political organizations, large corporations and nonprofit organizations, international and leadership positions at major news bureaus, leadership positions at organizations that specialize in investor relations, marketing, promotion, publications production, community relations, image development, crisis management, international trade, environmental issues, and strategic philanthropy.

Commitment to Iowa Students and Teach-Out: The University submitted a letter signed by the Vice Provost for Online Education and Academic Innovation agreeing to provide alternatives for students to complete their programs at the University or at another school if the University discontinues a program or the school closes before students have completed their courses of study.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Under Iowa Code Section 714.19, George Washington University is exempt from filing evidence of financial responsibility as a college or university “. . .authorized by the laws of Iowa or any other state or foreign country to grant degrees.” The University was originally created by an Act of the United States Congress on February 9, 1821. The University was reauthorized to grant degrees in the District of Columbia by an Act of the U.S. Congress dated January 4, 1977, which was signed by President Jimmy Carter on October 18, 1977.

Section 714.23 – State Tuition Refund Policy

GWU is not required to implement the Iowa tuition refund policy for withdrawn Iowa-resident students since it is not a for-profit institution.