

IOWA COLLEGE STUDENT AID COMMISSION

Prince Institute Application for Postsecondary Registration Renewal August 2014

STAFF ACTION:

Approve Prince Institute's request for registration in Iowa for a two-year term that begins on August 20, 2014, and ends on August 20, 2016.

As a condition of registration:

- Prince Institute must notify the Commission of the Iowa location at which an Iowa resident will participate in a practicum within 90 days of the date the Institute establishes a new practicum 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. Prince Institute (the Institute) applied to offer distance education programs, several of which include a structured practicum that an Iowa resident would participate in at an Iowa location.

Note: On May 28, 2014, Prince Institute's parent company, Stenograph, LLC, announced that the Institute is no longer accepting new students and will voluntarily teach out its current students. The Institute plans to maintain its campus in Illinois and its campus in Alabama, which supports its online programs, until all of its students have the opportunity to complete their programs. See below, under "Commitment to Iowa Students and Teach-Out" for additional information.

Institutional Information

Prince Institute is a for-profit postsecondary educational institution that specializes in preparing students for court reporting, real-time captioning, and transcription professions. The Prince Institute campus that supports its online programs is located at 7735 Atlanta Hwy., Montgomery Alabama. The Institute maintains one other campus at 1300 E. Woodfield Rd., Suite 110, Schaumburg, Illinois. The school's chief executive officer is John Wenclawski, at 596 W. Lamont Road, Elmhurst, Illinois, which is also the administrative office of its parent company Stenograph, LLC. Neither Prince Institute nor Stenograph, LLC are registered with

the Iowa Secretary of State to conduct business in Iowa. While corporate registration in Iowa is preferred, the Commission cannot require it.

Prince Institute is owned by Robert Panfil and David Wynne. Its parent company is Stenograph, LLC, at 596 W. Lamont Road, Elmhurst, Illinois. Stenograph is a supplier of productivity tools for the court reporting profession such as software, supplies, and training. In addition to being a part owner of the Institute, Robert Panfil, Stenograph's Sr. Vice President of Finance, is identified in the Prince Institute catalog as a principal in the governance of the Institute. John Wenclawski, the President of Stenograph, is also the President of Prince Institute.

Normally, one would expect that a for-profit school is governed by a group of individuals who can make academic and other decisions that are in the best interests of the school without undue influence by the school's owner(s) or parent company. However, in this case, staff believes that the ultimate goals of the parent company, Stenograph, align with those of Prince Institute in terms of supporting the unique professions of court reporting, captioning, and transcription. For that reason, staff is not concerned about the cross-over leadership at Stenograph and Prince Institute. The Institute maintains an independent Board of Advisors composed of experts in the court reporting and captioning professions. It has an independent Academic Dean, Campus Director, and Director of Campus Operations. Faculty, the Board of Advisors, and the independent Institute administrators have input into curriculum evaluation and modification, as discussed below under "Curriculum Development."

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

Accreditation: Prince Institute is accredited by the Accrediting Council for Independent Colleges and Schools (ACICS).

An individual who wishes to practice in Iowa as a court reporter must be certified by the Iowa Board of Examiners of Shorthand Reporters, a unit within the Iowa Judicial Branch. Applicants for certification as a shorthand (court) reporter may qualify for the requisite Iowa certification examination in one of three ways, including completion of a program approved by the National Court Reporters Association (NCRA). The NCRA approves the online court reporter program offered by Prince Institute.

Federal Stafford Loan Cohort Default Rate (FFY 2010): 10.2%

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

Graduation Rate: 25%. 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: \$17,625 (for the Prince Institute Southeast campus that coordinates the online programs.)

Record Preservation: Since 2011, the Institute's student records have been scanned and stored into a password protected electronic document filing system. The servers containing the information are uploaded to an off-site back-up server every evening.

Student files prior to 2011 and any current paper student files are maintained at the Institute in fire-proof, locked filing cabinets. The Institute is currently going through its existing paper files and scanning them into the electronic storage. After its closure, Prince Institute will maintain student records through a process supported by its parent company, Stenograph, LLC. Prince Institute will notify its graduates about that specific process.

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

Eileen Greenan
596 W. Lamont Road
Elmhurst, IL 60125
(630) 532-5380

Students may request that an official transcript be provided to a third party only by written request. The Institute will not fax or email an official transcript to a third party.

Instructional Methodology: Prior to the start of the quarter, all new online students must participate in an online orientation. This orientation session includes a review of school policies and procedures, an overview of resources and strategies for success, and an introduction to the online classroom environment. Online coursework provided over the internet utilizing a Blackboard or Desire2Learn management system allows students to fulfill the same course objectives as their onsite counterparts. The learning management system includes discussion boards and facilitates email communication among instructors and students.

Students must be able to commit a minimum of 35 hours per week for coursework. The online courses may contain synchronous and asynchronous components. Students must be present during synchronous course sessions of 50 minutes in length. Synchronous make-up sessions are permitted only at the instructor's discretion. Synchronous sessions may include weekly video interaction forums between students and instructors via Blackboard Collaborate, weekly or bi-weekly assignments such as homework, practice on Performance eValuator, practice with digital recordings or readings, evaluations such as quizzes, exams, reflections, or speed testing using five minute dictations.

Equipment used by students to access the online classroom must permit receipt of audio, video, and streaming media. In addition to equipment that facilitates online classroom access, students must also have a real-time writing machine programmed with specific software to permit the input of text directly into the virtual classroom, discussion boards, testing and Performance eValuator tools.

Student Learning Resources: Library services are provided through the Learning Management System. Students have access to both EBSCO and FPL online research databases.

The Institute's Online Coordinator monitors online course delivery through the distance education learning platform, monitoring course site content, teacher and student activity and communications, and quality of instruction. The online coordinator is also available to orient and guide students to the proper resources if they need assistance in academic advising, technical support, guidance counseling, placement services, or counseling in general.

Persons or departments that are available for advisory services relating to financial aid, academics, coaching and tutoring, and distance education concerns are identified in the Institute Catalog.

Prince Institute provides all students with no-cost access to counseling on personal issues through a confidential hotline (available 24 hours a day, 7 days a week) and website: www.guidanceresources.com. This service is staffed by professional clinicians who will listen to the student's concerns and, if appropriate, refer the student to resources in his or her community. Personal concerns that the counseling service is prepared to address include relationships, problems with children, substance abuse, stress, anxiety or depression, major life changes, marital conflicts, and grief and loss.

Prince Institute provides on its Student Services website a number of videos in which professionals offer strategies for success including, for example, a two-minute video on speedbuilding advice and tips that has been viewed over 1700 times. The Institute also posts web-based videos from professionals who share lessons learned from the field, and provide insight on successful career strategies and ways of working. The Institute promotes a mentoring program available through the National Court Reporters Association that pairs court reporting and captioning professionals with the Institute's students who are interested in receiving professional guidance and encouragement. The Institute offers resume writing help and mock interviews in preparation for a career, and placement assistance to connect students with reporting agencies that are seeking reporters, captioners, or scopists. The Institute assists students by arranging interviews with potential employers, providing internship opportunities, and helping students find the employer that best matches their interests, personality, and degree of skill. While Prince Institute cannot guarantee job placement, its faculty and administration maintain a high level of contact with working firms and professional associations nationwide.

Curriculum Evaluation and Development: Faculty members have a major responsibility in the achievement of outcomes for student learning and the quality of academic programs. Participation by faculty in academic and appropriate governance matters is encouraged and considered critical in the educational process. The primary role of faculty is to develop and implement educational goals and objectives, including curriculum, academic standards, and programs. In addition, program faculty members participate in decision-making activities involving academic policy such as faculty work environment and professional development.

The Faculty Council, where membership includes only faculty representatives from each school division, serves as a major course of curriculum-related information and recommendations. Faculty members make recommendations to the Academic Dean, who refers those recommendations to the Institute's Board of Advisors. The Board of Advisors is composed of practitioners in the court reporting, scoping, and captioning professions as well as persons who have a vested interest in the quality of the professional product, such as judges and lawyers. After feedback is received from Board of Advisors, proposals are reviewed by the Campus Director and Director of Campus Operations. The final authority for approval of curriculum changes is the Institute President.

Student Complaints Process: Students who seek remedy for a grievance or a concern should take the following steps:

- The concern should be taken first to the source (instructor, fellow student, etc.), as most problems can be resolved there.
- In the event the concern is not resolved at the source, the student is encouraged to present the issue to the Program Chair, then administration. For example, if the concern is with an instructor, the complainant would contact the instructor, then the program chair, then the Dean of Academic Affairs or Campus Director. After the Dean of Academic Affairs or Campus Director performs an investigation of the situation, a report of the outcome or decision will be provided to the complainant within three (3) class days.
- All claims of deceptive sales or trade practices should first be directed to the Dean of Academic Affairs or Campus Director.
- If the student is dissatisfied with the outcome of the complaint, the student may submit a written grievance to the next level of administration. Typically the next level will be the Campus Director. The written grievance should include:
 - ✓ A statement of the dispute or misunderstanding and the facts upon which it is based.
 - ✓ The outcome or decision that was given by the previous Administrator and why that outcome or decision is unsatisfactory.
 - ✓ The remedy or corrective action that would be satisfactory.
- After due consideration and upon further investigation, if deemed appropriate, the administration will submit to the student a final decision in person or in writing.

The Institute directs students with complaints to its accrediting agency (ACICS), state licensing officials, and the U.S. Department of Education Office of the Inspector General, and provides contact information for these entities.

Distance Education Programs Offered In Iowa

The total, estimated cost of tuition, fees, books and supplies for each program is listed below based on the Institute's gainful employment disclosures. .

Certificate Programs

- Legal Transcription: \$13,635
- Office Assistant: \$14,120

Associate Degree Programs

- CART (Communication Access Realtime Translation)/Captioning: \$38,960
- Judicial Reporting: \$38,690
- Professional Transcription: \$20,970

**Field Experience:*

- For the Judicial Reporting program, students must complete a practicum of at least 80 hours, produce a transcript of at least 60 pages, and submit a practicum record verifying the time spent with the supervising reporters.

- Students enrolled in the CART/Captioning program must complete at least 25 hours of writing and 15 hours of research and dictionary preparation under the supervision of a practicing CART provider, and another 25 hours of writing and 15 hours of research and dictionary preparation under the supervision of a practicing captioner. Students must submit an internship verification form verifying the time spent with the supervising practitioners.
- Students enrolled in the professional transcription program must complete a practicum of at least 180 hours in business office and transcription services. The student must submit a practicum record verifying the time spent with the supervising personnel.

Registration Compliance

As required by Iowa Code Section 261B.4, Prince Institute provided an institutional policy for refunding tuition charges for withdrawn, Iowa-resident, online program students. The Institute's tuition refund policy for Iowa-resident students exceeds the requirements of Iowa Code Section 714.23. The Institute will implement the Iowa tuition refund policy upon registration approval and disclose its policy for Iowa-resident online program students in a catalog addendum that the Institute provides via email to all students.

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. The Institute complies with the requirements of Iowa Code Section 261.9(1)(e) and (f), and discloses these policies to students in the following:
 - ✓ The Institute catalog at http://www.princeinstitute.edu/sites/default/files/Prince%20SE%202013%20Catalog_4-2014.pdf.
 - ✓ The Institute's Annual Safety and Security Report, which was provided to staff for review and, under federal regulations, must be disclosed to students annually by October 1.
 - ✓ A Violence Against Women Act policy, which was provided to staff for review and published in a catalog addendum that the Institute provides via email to all students.
- 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. During the registration application review process, the Institute made additional modifications to bring its policies in direct alignment with Iowa Code. The Institute will

implement this policy upon registration approval and disclose the policy in a catalog addendum, which is distributed via email to all students.

- 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 requiring employees, who in the course of their employment, attend, examine, counsel, or treat a child to immediately report suspected incidents of child physical and sexual abuse to law enforcement and to the school. By cross-reference to existing administrative rules for registration [283-21.2(261B), subsection 7], this policy applies to distance education program providers only if the provider has a compensated party conducting operational activities at a location in Iowa. Prince Institute has no compensated party conducting any operational activity in Iowa and therefore this policy is not applicable.

Student Consumer Information: In its registration application, the Institute 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 Academy discloses them in its online catalog

http://www.princeinstitute.edu/sites/default/files/Prince%20SE%202013%20Catalog_4-2014.pdf and catalog addendum, which is distributed via email to all students.

Prince Institute 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 Institute will provide this information to Iowa-resident online program students in its catalog addendum, which is distributed via email to all students.

Financial Responsibility: Prince Institute submitted copies of an independent audit conducted by West & Company, a certified public accounting firm, dated February 26, 2013, for the Institute's institutional fiscal year ending December 31, 2012. The auditing firm expressed its opinion that the Institute's financial statements present fairly, in all material respects, the financial position of the Institute.

- 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. The independent auditors' report states that the Institute's composite score for the institutional fiscal year ending December 31, 2012, was 1.8 (out of a possible 3.0).
- A for-profit institution is prohibited from deriving more than 90% of its revenue from Title IV aid. The Institute's independently audited financial statements report that, as of the

institutional fiscal year ending December 30, 2012, the Institute derived 79.7% of its revenue from Title IV aid.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Prince Institute has no Iowa-based faculty. Administrative rules effective January 15, 2014, do not require that a school hire Iowa-based faculty if it applies for authorization to offer only distance education programs.

Instructional/Supervisory Staff Qualifications: During a review of faculty profiles, staff noted that while the Institute's programs focus primarily on skill-building in court reporting, captioning, and transcription, instruction in English, medical and legal terminology is required for accuracy and proficiency in these professions. Staff reviewed the educational and professional experience of Prince Institute faculty and administrators posted on its website.

Of 19 faculty members profiled:

- Two have a doctoral degree in chiropractic medicine or law, respectively.
- Five have a master's degree in Business Administration, English, Elementary English and Literacy, Education, and Human Development.
- Five have a baccalaureate degree in Court Reporting, Project Management, Business Management, Political Science, or English.
- The remaining faculty members hold an associate degree or certification in court reporting or real-time captioning.

Experience among these faculty members includes individuals with from 10 to 34 years experience in court reporting, 29 years of experience in shorthand reporting, 29 years of experience teaching shorthand reporting, 13 years of experience in real-time captioning, 11 years of experience in scoping, and 20 years of experience in teaching English. Another faculty member with a baccalaureate degree in project management has an associate degree in computer networking systems and is the Institute's technical support expert.

Commitment to Iowa Students and Teach-Out: As indicated above, Prince Institute is accepting no new enrollees. It is in the process of teaching out its currently enrolled students and preparing for eventual closure. The Institute provided staff with a very thorough and detailed teach-out plan that includes plans for continuing instruction and providing students with specific academic plans and other support services to maximize program completion. The Institute's plan also includes specific information about the disposition and permanent housing of student records, specific disclosures provided to students, and a question/answer document for students. At this time, Prince Institute anticipates closing on July 1, 2017. By that time, currently enrolled students who follow their individual academic plans and make satisfactory academic progress should have completed the Institute's longest programs of three academic years in length. The Institute submitted a letter signed by President Wenclawski in which he provides assurance that the Institute's teach-out process will continue to support students and allow them to complete their programs. After the school closes, graduates will be able to obtain their student records and transcripts through a process supported by the Institute's parent company Stenograph, LLC.

Student Complaints: None.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Prince Institute has filed satisfactory evidence of financial responsibility, including a continuous corporate surety bond payable to the State of Iowa in the amount of \$50,000. The company that issued the bond is Liberty Mutual Insurance Company.

Section 714.23 – State Tuition Refund Policy

Prince Institute's tuition refund policy for online Iowa-resident students exceeds the requirements of Iowa Code Section 714.23, as discussed above under "Registration Compliance."