

IOWA COLLEGE STUDENT AID COMMISSION

University of Saint Mary Application for Postsecondary Registration in Iowa August 2014

STAFF ACTION:

Approve the University of Saint Mary's application for postsecondary registration in Iowa for a term beginning on August 22, 2014, and ending on August 22, 2016.

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 University of Saint Mary to apply for registration to offer distance education programs to Iowa residents because it offers a fully "at a distance" program(s) that includes a structured field experience that an Iowa resident would participate in at an Iowa location.

Institutional Information

The University of Saint Mary is a private, non-profit educational institution located at 4100 South 4th Street, Leavenworth, Kansas. The Chief Executive Officer is President Diane Steele, Ph.D., at the same address. The University of Saint Mary is not registered with the Iowa Secretary of State as a nonprofit corporation conducting business in the State. While registration with the Iowa Secretary of State is preferred, the Commission cannot require it.

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

Accreditation: The University of Saint Mary is accredited by the Higher Learning Commission, a regional accrediting agency recognized by the federal Department of Education. The University also holds special programmatic accreditation from the following entities that are recognized by the federal Department of Education for accreditation in their specialized academic area:

- The National Council for Accreditation of Teacher Education, for its online Master of Arts in Teaching program.
- The Commission on Collegiate Nursing Education, for its post-licensure baccalaureate nursing program.

Federal Stafford Loan Cohort Default Rate (FFY 2011): 4.2%

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

Graduation Rate: 53%. 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: \$55,843 (institution wide)

Record Preservation: Transcripts are retained for all time and are never destroyed. Transcripts of students enrolled prior to 1982 are stored in fire-proof cabinets in an archive room on campus. Transcripts of students enrolled after 1982 are stored in the University's student information system. Hard copy folders containing student applications dated prior to fall 2012 are stored in the University archive room. Beginning in Fall 2012, all student documentation (application, transcripts, previous schools, etc.) are stored electronically. The electronic information system is backed up every 24 hours. A copy of the daily back-up is stored in the vault of a financial institution in Leavenworth, Kansas.

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

Registrar's Office
4100 South 4th Street
Leavenworth, Kansas 66048
(913) 682-5151

<http://www.stmary.edu/Academic-Programs/Registrar/Request-a-Transcript.aspx>

Students or graduates may access a transcript request form at the website above. However, the transcript request must be faxed, delivered in person, or mailed. See the website for additional information about faxing and payment.

Instructional Methodology: Each online course provides for asynchronous discussion assignments as well as asynchronous interaction between students and the instructor. Additionally, tools are provided for synchronous interaction within the online classroom via chat and audio and video conferencing. To encourage student interaction, many courses require team assignments that are facilitated through a team "wiki" or an asynchronous discussion board. Video conferencing capability is built in to each course and is available to the students as well.

Students are expected to log into the classroom environment multiple times each week for assigned readings, video content, recorded lectures, papers, and discussion questions. Students must post responses to classroom discussion prompts by set days in the week. These responses are in reaction to discussion prompts that relate to the topic being covered. Throughout the week students must also respond to other student's posts and are expected to comment on responses to their own posts. Papers and other assignments are required as appropriate.

Course instructors interact with students through discussion sections, email, or Gradebook to provide feedback on assigned work. Instructors may also choose to contact students directly through email or other methods as needed. If appropriate, instructors may arrange for times when students log into a group chat or conference call as a means to interact with each other.

The University provides self-paced courses on the functionality of our online learning management system (LMS) for both students and instructors, as well a course that provides insight for the instructors into teaching methods and best practices. New online students participate in a New Student Orientation

to the Learning Management System (LMS). Instructors are provided a one-on-one orientation with our online training staff to the LMS. Both students and instructors have access to an extensive online library of self-help resources in PDF and video format as well as a 24-hour Help Desk to assist them.

Student Learning Resources: The University's DePaul Library provides online students with access to its catalog and reference databases such as Credo, EBSCO, an eBook Collection, ERIC (Educational Research Information Center), ProQuest Nursing and Allied Health Source, the Cochrane Library, Evidence Based Medical Guidelines through the Wiley Library and UpToDate for health care related research. In addition, the University provides its online students with online access to the Kansas State Library. The Library maintains Library Guides in 18 different topics that include both academic study topics and technical topics such as citing sources and a scholarly research tutorial.

The University's library provides "Ask a Librarian" services from two library staff by phone, email or chat during regular library business hours. Business hours are Monday – Thursday 8 am to 9:30 pm, Friday 8 am to 4:30 pm, and Sunday 5:30 pm to 9:30 pm. The Library is closed on Saturday. Students who need books or periodicals that are not available in the DePaul Library may request them through interlibrary loan, although off-campus students are encouraged to first contact their public or home academic library.

The University maintains an Academic Resource Center that helps students of all abilities become more effective learners. Services include tutoring in specific subject areas, a writing center, and effective study tips. The University's Student Success Office does not provide tutoring, but offers a support network to help guide a student to the right major, learn better organizational skills, connect a student to the right University resources, or support a student or graduate in investigating career options or planning career changes. The Campus Counseling Center provides confidential counseling related to personal issues, crisis intervention, text anxiety, and referral to off-campus providers when needed. The University does not charge for any of these services. Online students may access any of these resources by telephone or email.

Curriculum Evaluation and Development: The faculty of USM is charged with making recommendations to the vice president for academic affairs on matters related to academic programs and curricula, and academic policy. Faculty concerns may also be sent directly to the president as resolutions adopted by the faculty senate in ordinary or extraordinary meetings. The faculty exercises these responsibilities through the faculty senate, membership on standing academic committees that are part of the faculty senate, and task forces as may be appointed on the recommendation of the vice president for academic affairs and faculty senate or directly by the president.

The academic affairs committee develops undergraduate-level programs. The academic affairs committee has responsibilities that include reviewing and coordinating recommended changes to the curriculum. The committee then makes a recommendation to the faculty senate. A separate graduate council develops policy, reviews and recommends graduate programs, communicates with university constituencies regarding policies and programs, and makes recommendations to the faculty senate. Regardless of whether the faculty senate advances or denies a standing committee's recommendation, the chair of the faculty senate transmits the senate's recommendation to the vice president of academic affairs.

The teacher education committee (TEC), appointed by the president, has the responsibility and authority to develop, administer, evaluate, and revise all professional education programs. TEC membership includes all full-time faculty members in the education department, selected faculty from

the secondary education areas, the coordinator for field experiences, and the education coordinator from the center. The TEC serves as the initiating body for policies and curricula in teacher education for undergraduate programs; and for the graduate programs through the appointed representation of the unit head and the education graduate coordinator to the graduate council. The education unit/department chair takes policy and curricular decisions to the vice president for academic affairs, the academic affairs committee, or the graduate council as appropriate to governance procedures of USM.

Faculty with at least a half-time appointment constitutes the membership of the faculty senate. Unless otherwise provided, the vice president for academic affairs or designee is a non-voting ex officio member of the faculty senate. The faculty senate meets once each month during the academic year to confer, deliberate, and vote on resolutions and recommendations involving curriculum and academic policy. Faculty members are expected to participate in other operational concerns of the institution which may include service on department committees, attendance at department meetings, and participation in the decision making and curriculum development processes. Evidence of faculty service to the University is contained in an end-of-the-year activity report.

Student Complaints Process: University of Saint Mary provides various means by which student complaints and concerns may be addressed. In all cases, students are encouraged to put their concerns in writing and carefully document the events that led to the complaints. All complaints, concerns, and suggestions made by students will be addressed in order to resolve the situation and improve the quality of the educational programs at the institution. No retribution against any individual complainant is permitted.

Whenever possible, students are encouraged to seek an informal resolution of the matter directly with faculty or individual(s) involved. Often a complaint can be resolved in this way. However, if an informal approach is neither successful nor appropriate, the student should use the following procedures:

- For complaints related to the disability accommodation process, students should contact the director of the Academic Resource Center, and/or contact the President of the University.
- For complaints of academic dishonesty, students should refer to and follow procedures outlined in the Student Handbook under Non-Academic University Policies and Procedures for All Students.
- For all other complaints of an academic nature, students should follow procedures outlined in the University's Academic Catalog.
- For complaints related to non-academic policies (e.g., conduct and behavior issues), students should refer to and follow procedures outlined in the Student Handbook under Non-Academic University Policies and Procedures for All Students.
- For complaints related to sex discrimination, sexual harassment, and sexual violence, students should refer to and follow procedures outlined in the Student Handbook under Title IX Grievance Complaint Procedures.

If a student does not believe that any of the above applies to the nature of the student's complaint, the student may contact the Vice President of Student Life. The Vice President, or his/her designee(s), will work with the student to resolve the issue or direct the student to the appropriate policy and/or person that will be responsible for resolving the complaint). The resolution process may include informal discussions and interviews with the relevant parties. The Vice President of Student Life will make a determination and issue a written statement to the student regarding the resolution of the complaint. The student may appeal the Vice President of Student Life's determination by filing a written appeal to

the President of the University within five (5) working days of receiving the determination. The decision of the President of the University is final and will be provided to the student in writing.

The University discloses its grievances policies on its website at <http://www.stmary.edu/Student-Handbook/Complaints-Students.aspx>.

Distance Education Programs Offered In Iowa

The University of Saint Mary offers the following distance education programs to Iowans. Total estimated tuition charges, fees, books, supplies, and other costs payable to the school by a student is provided for each program.

Baccalaureate Degree Programs

- *Bachelor of Science in Health Information Management degree completion program – \$35,640
- RN to Bachelor of Science in Nursing degree completion program - \$15,770

Master's Degree Programs

- *Master of Science in Nursing (Nurse Educator or Nurse Administrator) - \$22,800
- Master of Business Administration - \$23,700
- Master of Arts in Teaching (non-licensure) - \$17,850

**Field Experiences:*

- Bachelor of Science in Health Information Management: Students enrolled in this program participate in a three credit-hour, mandatory professional practice experience in which students gain exposure to the multiple venues that healthcare is practiced and the role of the health information management professional. Students also participate in a one to six hour healthcare internship where students employ practical skills learned in the program in a working environment. Students are evaluated by faculty based on input from supervisors at the internship site.
- Master of Science in Nursing: Students enrolled in the Nurse Educator specialization implement the nurse educator role in a nursing education setting. In this two credit-hour and 120 clock hour course, students have the opportunity to utilize learning and teaching strategies, assessment and evaluation methods, and technologies to enhance learning with students from diverse backgrounds. Students are supervised at the education site by a master's or doctorate prepared preceptor.
- Students in the Nurse Administrator specialization participate in two practicum courses of four credit hours and 240 clock hours of practicum in the role of a nurse administrator in a healthcare organization. Students apply knowledge, skills, and abilities of a nurse administrator under the supervision of a master's or doctorate prepared site preceptor.

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. The University maintains drug and alcohol prevention policies, penalties for drug/alcohol violations and sexual harassment or physical abuse and resources for sexual assault intervention in its Student Handbook and in an Emergency Management Plan on the University’s Campus Safety webpage:
 - ✓ [http://www.stmary.edu/Student-Handbook/Alcohol-and-Other-Drug-\(AOD\)-Policy.aspx](http://www.stmary.edu/Student-Handbook/Alcohol-and-Other-Drug-(AOD)-Policy.aspx)
 - ✓ <http://www.stmary.edu/Student-Handbook/Title-IX-Policy.aspx>
- 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. University Saint Mary worked with staff during the registration application process to make modifications to its existing military deployment withdrawal policy to align with the requirements of Iowa law. The University will disclose the policy to Iowa resident students on its military withdrawal webpage <http://www.stmary.edu/Admissions/Veterans-Active-Duty/Withdrawal-Info.aspx> and in its catalog.
- 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 administrative rules for registration [283-21.2(261B), subsection 7, effective January 15, 2014], this new policy now applies to schools that offer online programs only if the school compensates one or more parties to conduct instruction or other operational activities on the school’s behalf at an Iowa location. At this time, the University of Saint Mary has no Iowa-based employees or contractors. Thus, it is exempted from the implementation of this policy.

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 Academic Catalog at <http://www.stmary.edu/Academic-Programs/Academic-Catalog.aspx>.

The University of Saint Mary 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 will disclose this information on its state authorization and student complaint contact web page at <http://www.stmary.edu/Admissions/For-Online-Learners.aspx>

Financial Responsibility: The University submitted a copy of an independent financial audit conducted by BKD, 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 University’s financial position.

- 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, out of a possible maximum score of 3.0, in order to be determined financially responsible without additional oversight. The most recent composite score reported by the federal Department of Education for the University of Saint Mary is 2.4.

Full-Time Iowa Resident Faculty Member or Program Coordinator: The University has no lowa-resident faculty or other staff. Per administrative rule changes that are effective January 15, 2014, this is no longer a requirement for a school that applies for registration purely to provide online programs to lowa residents and has no compensated party working remotely for the school from an lowa location.

Instructional/Supervisory Staff Qualifications: Staff reviewed core faculty profiles posted on the University website for the online programs that it will offer to lowa residents:

- Bachelor of Science in Health Information Management: Staff located two faculty profiles. One faculty member has a doctoral degree and 20 years of teaching experience in the field. This faculty member has been the President, Director, Delegate and Chair of multiple committees for the Kansas Health Information Management Association. He is a Commissioner with the accrediting body for Health Information Management programs and created the University’s program curriculum. The second faculty member has a baccalaureate degree and 15 years of experience in the health information management field. This faculty member has seven years of prior experience as the Health Information Management director for a critical care facility. She is also an American Health Information Management Association certified trainer.
- RN to Bachelor of Science in Nursing: Staff located seven faculty profiles. All seven faculty members have a master’s degree and all are a registered nurse, a registered advanced practice nurse, or a clinical nurse specialist. Experience among these faculty members includes medical-surgical nursing, infection control, administration and staff education, school nursing, long-term care, geriatric nursing, emergency care, critical care, oncology, obstetrics, pediatrics, psychiatric nursing, cardiovascular care, end-of-life care, and nursing education.
- Master of Science in Nursing: Staff located six faculty profiles. One faculty member who is the Director of the MSN program has a doctorate in education and a master of science in nursing. The remaining faculty members have a master’s degree in nursing. All six faculty members are a registered nurse, a registered advance practice nurse, a clinical nurse specialist and/or a certified nurse educator. Experience among these faculty members includes obstetrics, critical care, surgical nursing, cardiovascular care, family practice, emergency care, pediatric nursing, oncology, infection control, long-term care, school nursing, and nursing education.

- **Master of Business Administration:** Staff located four faculty profiles. One faculty member, who is the Chair of the Business, Accounting, and Sports Management Department, has a doctorate in education and a master's degree in business administration. The remaining three faculty members have master's degrees in management, marketing, and computer management. Experience among these faculty members includes as a certified public accountant, computer programmer, system analyst, database administrator, and in fields such as travel and tourism, teaching, human resources and ethical training, strategic and tactical planning, and higher education administration.
- **Master of Arts in Teaching:** Staff located eight faculty profiles. Seven of these faculty members have a doctoral degree in education. The remaining faculty members have a master's degree in education and an education administrator's certification. Experience and expertise among these faculty include K-12 teaching and administration, STEM, curriculum development, staff development, media services, special education, career and technical education, adult education, federal program and grant management, technology, distance education, higher education department leadership, school reform, school culture, educational policy, and accreditation.

Commitment to Iowa Students and Teach-Out: The University submitted a letter signed by President Diane Steele affirming the University's commitment to the delivery of online programs to Iowans, and agreeing to provide alternatives for students to complete their programs and the same or other institutions if the University closes a program before students have complete their courses of study.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

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

Section 714.23 – State Tuition Refund Policy

The University is not required to implement the State Tuition Refund Policy because it is a non-profit postsecondary educational institution.