

IOWA COLLEGE STUDENT AID COMMISSION

Northwestern College Voluntary Application for Postsecondary Registration in Iowa April 7, 2016

STAFF ACTION:

Approve Northwestern College's voluntary application for postsecondary registration in Iowa for a two-year term that begins on April 7, 2016 and ends on April 7, 2018.

Registration Purpose

Northwestern College (NWC or "the College") lawfully operates a postsecondary, degree-granting institution in Iowa under an exemption from registration in Iowa Code Section 261B.11, subsection 1, paragraph "j": "Higher education institutions that meet the criteria established under section 261.9, subsection 1." The criteria referenced in Iowa Code Section 261.9, subsection 1, establish institutional eligibility for the Iowa Tuition Grant Program. NWC meets the Iowa Tuition Grant Program institutional eligibility criteria. Whether an institution actually awards funds from this state grant program is irrelevant. Thus, NWC is not required to seek the explicit approval of the State of Iowa in order to lawfully offer postsecondary degree programs in Iowa. For the purpose of the federal Department of Education's rules in 34 CFR 600.9 that require federal student aid participating schools to be authorized by an action of the State in which the school is located, NWC is listed in Iowa Administrative Code 281-Chapter 21, by name, as a private nonprofit, degree-granting postsecondary educational institution that lawfully operates in Iowa. However, NWC has elected, voluntarily, to seek official designation by the Iowa College Student Aid Commission as a registered school under Iowa Code Chapter 261B and associated rules in Iowa Administrative Code 281-Chapter 21 that are in effect as of the date of this report.

Institutional Information

NWC is a private, non-profit postsecondary institution that provides instruction via face-to-face and distance education delivery modalities from its main campus located at: 101 7th Street SW, Orange City, Iowa 51041. The College's chief executive officer is NWC President Gregory Christy at the same address. The designated Iowa contact person for NWC is Rebecca Hoey, Director of NWC Graduate School & Adult Learning, also at the same address. The Iowa Secretary of State records an active, domestic non-profit corporation registration # 61510 for Northwestern College. The registered agent is Bradley K. De Jong and he can be contacted at the same address.

Physical facilities: NWC is on a 100-acre campus in Orange City, Iowa. Among its major buildings are:

- The Juffer Athletic Fieldhouse opened in 2015.
- The Ramaker Center, renovated in 2014.
- The DeWitt Learning Commons opened in 2013.

- The DeWitt Physical Fitness Center, renovated in 2011 and 2013.
- The Rowenhorst Student Center (RSC), remodeled in 2007, houses the college's café, bookstore, mailroom, and health and counseling services.
- The DeWitt Theatre Arts Center opened in 2004.
- The Korver Visual Arts Center opened in 2003.
- The Bultman Center for Health, Physical Education and Intercollegiate Athletics, opened in 1995.
- Christ Chapel and the DeWitt Music Hall opened in 1987.
- Zwemer Hall, built in 1894 and restored in 1997 (listed in the National Register of Historic Places).
- NWC has five buildings dedicated to housing with the capability to accommodate over 750 students. NWC also has six apartment buildings containing 63 apartments varying in housing capacities.

A map of the campus is available online at: <https://www.nwciowa.edu/campus/map> and includes a link for interactive campus tours.

Instructional Methodology: NWC offers courses and programs via in-person instruction, distance education, and hybrid programs utilizing both face-to-face instruction and online instruction.

The programs offered online at this time are asynchronous; students can complete coursework and communicate with their instructor and classmates when it works best in their respective schedules. Deadlines are set weekly, so as long as students meet deadlines they can take classes and do homework when it best suits them.

Communication primarily occurs online via Blackboard, NWC's learning management software. Communication may also happen via email, phone and video conferencing if students are working on a project with a group or if students want more direct contact with another student or their professor. The professors provide email addresses and phone numbers, and students may contact them with questions.

Each week the students and professor engage in online discussions around a topic provided by the professor. The discussions occur in Blackboard, and students respond and offer comments at whatever time of day works best for them. Students use additional communication and collaboration tools, including journals, wikis, blogs, and Twitter chats

The courses in NWC's online programs use multimedia to enhance students' learning, with instructor-created and externally created video and audio. Extensive use of current research and current events are provided by embedded links to high quality websites and research databases hosted by DeWitt Library.

NWC subscribes to Blackboard Collaborate, which allows for online synchronous communication. Collaborate is embedded in each course, so students may self-select

'live' audio and visual communication with classmates and their professor. The tool allows for document and desktop sharing and collaboration.

Accreditation: NWC is accredited by the Higher Learning Commission, a regional accrediting agency recognized by the federal Department of Education. In addition, NWC has programmatic accreditation from the following entities:

- Both the Iowa Department of Education and the Council for the Accreditation of Educator Preparation (CAEP) accredits the elementary and secondary education programs.
- Council on Social Work Education (CSWE) accredits the social work program.
- Commission on Collegiate Nursing Education (CCNE) accredits the nursing programs.

Federal Stafford Loan Cohort Default Rate: The most recent official data from the federal Department of Education has determined NWC's federal Stafford Loan default rate for fiscal year 2012 at 2.6%. The national average default rate of all schools during that time is 11.8%.

Graduation Rate (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): NWC reports a graduation rate of 63%.

Average Loan Debt upon Graduation: NWC provided average loan debt upon graduation as \$34,695.

Record Preservation: NWC's Registrar's Office is responsible for the maintenance and dissemination of student academic records. Northwestern Classical Academy (1882 - 1927) hard copy transcripts are backed up on microfiche. Both the hard copies and microfiche are in storage in a locked room in DeWitt Library. All Northwestern Junior College (1928 - 1958) hard copy transcripts have been scanned and are stored on a college network drive in the form of PDF's. The hard copies are also in storage in a locked room in DeWitt Library. All other hard copy transcripts are located in a locked file room in the Registrar's Office.

Since 1995, all student transcripts, class lists, and grades have been stored on a college administrative server, which is backed up daily. The backup tapes are taken to an off-site location every night. The Registrar's Office also maintains files for each student containing records from other institutions, official exam score sheets, letters, admissions applications, and other pertinent information. University of Iowa Registrar's Office agrees to hold the student records of NWC for at least 50 years should NWC cease to exist, and agrees to maintain and provide official copies of these records

Transcript Requests: Any current or former student wishing to obtain a transcript may do so by contacting:

- ✓ Registrar's Office
Zwemer Hall
Northwestern College
101 7th Street SW
Orange City, IA 51041
712-707-7145
FAX: 712-707-7175
registrar@nwcsiowa.edu

- ✓ Making an online request at: <https://www.nwcsiowa.edu/registrar/transcript-request>.

Student Learning Resources: NWC uses Blackboard as the learning management system to deliver online programs. NWC's director of the Peer Learning Center and director of Writing Across the Curriculum has collaborated with the director of DeWitt Library and the director of the Graduate School & Adult Learning to curate online writing and research resources. The resources are embedded in every graduate course in Blackboard for all master's-level students, and they are available in the Nursing Student Orientation. Additional research resources are available as tutorials and subject guides to students who access the library online through the MyNWC portal.

NWC's DeWitt Library offers online resources including access to major databases, interlibrary loan services, writing tutorials, and access to librarians. The library offers an online 'Ask a Librarian', which includes a phone, email and chat option. From the library website, the library staff has developed a specific webpage with links for online students, including access information on ebooks, borrowing, and resource catalogs.

- ✓ <http://library.nwcsiowa.edu/>.

NWC's Career Services Center provides online resources on the internal site MyNorthwestern, or "MyNWC". Staff is also available for remote and phone communication, as well as email and meetings on campus, to offsite students.

NWC's Computing Service department provides troubleshooting online and on the phone with students who live off campus. They are available in the evening and on weekends. As well, students may submit a 'help ticket' through the college's online portal and will receive follow-up communication and support.

Students who enroll in an online program resulting in an endorsement, certificate or degree are assigned an academic advisor. Advising occurs primarily through email and phone calls.

Curriculum Evaluation and Development: NWC has policies in place that outline a process for curriculum evaluation and development. Each academic department completes an annual self-analysis of their own curriculum to determine the sufficiency of the current curriculum and to identify possible inadequacies or necessary revisions for

curriculum improvement. Faculty members in each academic department are responsible for curricular planning, for presenting curricular proposals to the Academic Affairs Committee. Consultation with content experts and advisory panels will be consulted regarding program addition or review and revision as needed. The procedures are further outlined that curriculum revision will then be decided by department chairs, department directors, and the Academic Affairs Committee. Decisions to implement new programs are made by department, chairs, department directors, and the Academic Program Assessment Committee. Academic Affairs Committee and the Academic Program Assessment Committee members are determined by both elections and certain members are predetermined by the position held at NWC.

Student Complaints Process: Student Handbook:

- Academic Appeals - page 8.
 - Financial Aid Probation Appeal - page 10.
 - Academic Suspension Appeal - page 11.
 - Academic Integrity - page 13.
 - Title IX Complaints - page 27.
- ✓ https://my.nwciowa.edu/ICS/icsfs/2015_Student_Handbook_FINAL.pdf?target=2f115f6f-3f1a-433f-9bf5-2f5e3e01d800.

Programs Offered Under Registration

(Note: The programs listed below are only those for which Northwestern College may need coverage under the State Authorization Reciprocity Agreement (SARA) policies and rules. However, Northwestern College's registration authorization to operate at a location in Iowa is at the institutional level; thus, the Commission authorizes the institution to offer all of its programs in Iowa).

The estimated total charge for tuition, fees, books, and supplies applicable to each program is listed below.

Residential Programs Offered at the NWC campus in Orange City, Iowa

Baccalaureate Programs

- Bachelor of Arts with majors in - Athletic Training, Criminal Justice, Education, Exercise Science, Fitness Management, Journalism, Public Relations, Sport Management, Strength and Conditioning, Translation and Interpretation - \$119,100.
- Bachelor of Social Work - \$119,100 (first-time licensure program that qualifies a NWC graduate for LBSW (Licensed Bachelor Social Work) in Iowa by virtue of the program's accreditation by the CSWE).
- Bachelor of Science in Nursing - \$129,000.

Distance Education Programs

Endorsements

- Pre-kindergarten – 3rd grade including Special Education - \$7,805.

- Athletic Coach - \$2,915.

Baccalaureate Programs

- RN-BSN - \$26,130.

Graduate Programs

- Master of Education in Teaching & Learning - \$11,550.

Field Experiences

Structured field experiences are a required part of the curriculum for the following programs:

- **Elementary and Secondary Education:** Nearly every education class includes a field experience with students in area K-12 schools or public libraries, requiring that 100 hours have already been spent in an educational setting before student teaching assignments begin. Student teaching can be done in the region or elsewhere in the U.S.
- **Nursing:** More than 840 hours of clinical experience are spent in a variety of rural hospitals, medical centers and community-based health settings. The program also requires medical mission experience in an off-campus U.S. or international location chosen by the student; opportunities include a summer study course in Tanzania or mission trips arranged through campus ministry.
- **RN-BSN:** The RN-BSN program is designed as a degree completion program for those nurses already licensed and in practice and includes 240 hours of clinical experience in in the region or elsewhere in the U.S.
- **Social Work:** Students spend time volunteering at agencies and shadowing social workers to learn about different social work careers and clients. During senior year, students complete a 400-hour required practicum in the region or elsewhere in the U.S.
- **Pre-kindergarten – 3rd grade including Special Education Endorsement:** 100 pre-student teaching practicum hours are required in the region or elsewhere in the U.S.

Registration Compliance

As required by Iowa Code Section 261B.4, NWC disclosed its policy on refunding tuition charges students who fail to complete the enrollment period for which they were charged. The refund policy is the same for undergraduate and graduate students in either residential or online programs. The policy is found on the website at:

- ✓ <http://catalog.nwciowa.edu/content.php?catoid=6&navoid=182#Refund>.

Administrative rules specifically require the school to comply with the requirements of Chapter 261.9(1) “e” through “h” by implementing the following policies.

- 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.

Northwestern College provided compliant policies that address both of these requirements. These policies are disclosed to students in the NWC Student Handbook and to prospective students and the public on the College's website at the following locations:

- ✓ <http://assets.nwciowa.edu/nwciowa/public/content/pdf/security-report.pdf>.
 - ✓ http://assets.nwciowa.edu/nwciowa/public/content/pdf/TITLE_IX_Policy.pdf.
 - ✓ <http://assets.nwciowa.edu/nwciowa/public/content/pdf/security-report.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. NWC provided a policy that is compliant with this requirement and will disclose the policy to students through the College's Student Handbook.
 - ✓ <http://catalog.nwciowa.edu/content.php?catoid=6&navoid=182#Refund>.
 - 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 new policy now applies to Iowa's registered schools. NWC provided a compliant policy to staff as part of its registration application. NWC discloses the policy to employees at hire and to the public in the College's Annual Security and Fire Report (Clery Report).
 - ✓ <http://assets.nwciowa.edu/nwciowa/public/content/pdf/security-report.pdf>.

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 in place and available to students through NWC's undergraduate and graduate student handbooks, which is available to students through the College's webpage and various other readily accessible College web pages, including those that address each specific NWC program.

- ✓ https://my.nwciowa.edu/ICS/icsfs/2015_Student_Handbook_FINAL.pdf?target=2f115f6f-3f1a-433f-9bf5-2f5e3e01d800 .
- ✓ <http://online.nwciowa.edu/uploads/files/pdf/catalog.pdf>.
- ✓ <https://www.nwciowa.edu/financial-aid/tuition>.

Iowa Code Section 261B.7 states that, while a school must not represent that it is "approved" or "accredited" by the Commission or the State of Iowa, a registered school must disclose that the school is registered by the Commission on behalf of the state of

Iowa and provide the Commission's contact information for students who wish to inquire about the school or file a complaint. The College currently discloses the Commission's contact information for student complaint purposes and provides a direct link to the Commission's constituent complaint form.

- ✓ http://assets.nwciowa.edu/nwciowa/public/content/Complaint_procedure_state_by_state.pdf .

Financial Responsibility: NWC submitted the audit report of an independent accounting firm Williams & Company, P.C., Certified Public Accountants dated November 5, 2015, covering the institution's financial position through June 30, 2015. The accounting firm stated its opinion that the school's financial statements present fairly, in all material respects, the school's financial position.

A private non-profit school that participates in the federal student aid programs must maintain a composite score, based on a three-factor financial responsibility ratio, of at least 1.5 in order to be determined by the federal Department of Education to be financially responsible without additional oversight. NWC's independent auditor did not report nor test NWC's financial responsibility composite score. The most recent financial responsibility composite score reported for NWC by the federal Department of Education is for the institutional fiscal year ending June 30, 2014, when NWC's composite score was 3.0 (out of a possible 3.0).

Full-Time Iowa Resident Faculty Member or Program Coordinator: NWC employs 82 full-time, Iowa-based faculty members. Additional information about faculty appears below.

Instructional/Supervisory Staff Qualifications: NWC maintains easily accessible information about faculty on each of its web-based program main pages. A sampling of faculty qualifications is listed below.

- Bachelor in Social Work program: Of two faculty members reviewed, one has a doctoral degree; both have master degrees in social work.
- Bachelor and Master in Education programs: Of four faculty members reviewed, three have doctoral degrees in education of which two are in education; all have a graduate degree in education.
- Bachelor in Nursing and RN-BSN programs: Of six faculty members reviewed, three have doctoral degrees; all have master degrees of which four are in nursing; all have baccalaureate degrees of which five are in nursing.

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

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

NWC is exempt from the financial responsibility (i.e., bonding) requirements of Iowa Code Section 714.18. The College qualifies for the following exemption listed in Iowa Code Section 714.19, subsection 10: “Private nonprofit schools that meet the criteria established under [Iowa Code] section 261.9, subsection 1.” The criteria established under Iowa Code section 261.9, subsection 1, is the *institutional* eligibility criteria that qualifies a school for participation in the Iowa Tuition Grant program. NWC meets the institutional eligibility criteria, and therefore qualifies for the financial responsibility exemption. For this purpose, whether a school actually awards funds from the Iowa Tuition Grant program is immaterial.

Section 714.23 – State Tuition Refund Policy

The Iowa tuition refund policy does not apply to NWC because it is a private nonprofit institution.

Compliance with Iowa Code Chapter 261F

NWC posts on its website a Code of Conduct for Educational Loans <http://assets.nwciowa.edu/nwciowa/public/content/pdf/Code-of-Conduct.pdf> addressing provisions of Iowa Code Chapter 261F. The NWC Code of Conduct appears to be an accurate and comprehensive reflection of Iowa Code provisions that govern certain aspects of business relationships between private education loan lenders and school personnel who have responsibilities related to education loans. NWC discloses on its financial aid page <https://www.nwciowa.edu/financial-aid/private-loans> that it maintains a list of preferred private education loan lenders and appears to be in compliance with requirements in Chapter 261F.