

Iowa College Student Aid Commission
March 18, 2011



IOWA COLLEGE STUDENT AID COMMISSION

Guiding Statements

Our Mission

We advocate for, and provide a continuum of services to support, Iowa students and families as they explore and finance educational opportunities beyond high school.

Our Motto

Your Financial Aid Connection.

Our Vision

All Iowans can achieve an education beyond high school.

Our Guiding Principles

We believe in the value of education and our commitment is to:

- Put students first.
- Uphold the public trust.
- Develop and empower a motivated, compassionate, and professional team.
- Create and nurture internal and external partnerships that benefit our customers.
- Provide services to our customers that exceed expectations and address their changing needs.
- Respect and honor the dignity of each other and all those we serve.

IOWA COLLEGE STUDENT AID COMMISSION

A G E N D A

March 18, 2011

10:00 a.m.

Iowa College Student Aid Commission Conference Room

- *1. Minutes of Meeting.....Tab A**
 - **January 21, 2011**

- 2. Executive Director’s ReportTab B Misjak**

- *3. Postsecondary Registration.....Tab C Small**
 - **Registration Fees**
 - **Full-Time Faculty Member/Program Coordinator**
 - **Registration Amendment- Vatterott College**

- 4. XAP PresentationTab D Anderson**

- 5. Committee ReportsTab E**
 - Legislative Committee Commissioner Adams**

- 6. Staff ReportsTab F**
 - **Administrative Budget/Expenditure Summary.....Krueger**
 - **GEAR UP Budget ReviewAnderson**

- 7. Adjournment**

*** Indicates Action Item**

UPCOMING MEETING DATE:

May 20, 2011

IOWA COLLEGE STUDENT AID COMMISSION

MINUTES OF MEETING

January 21, 2011

10:00 a.m.

**Iowa College Student Aid Commission
603 East 12th Street, 5th Floor, Des Moines, Iowa 50319
Conference Room**

Members Present:

Janet Adams	Timothy P. Cole
Robert Denson	Bob Donley
Crystal Ford	Greg Forristall
Shazia Manus	Frederick Moore
Herman Quirnbach	Kelli Todd
Roger Utman	Cindy Winckler

Members Absent:

Randy Feenstra	Terrence Martin
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Staff Present:

Michael Anderson	Todd Brown
Heather Doe	Tony Girardi
Deb Krueger	Julie Leeper
Karen Misjak	Bobbi Pulley
Carolyn Small	Ashley Wendt

Legal Counsel Present:

David VanCompernelle

Guests Present:

Laurie Becvar, University of South Dakota
Jeff Birdsley, BTC Capital Management
Mark Christy, Hamilton Technical College
John Parker, Iowa Student Loan
Andy Rahimi, Ashford University
Dan Richins, Ashford University
Melissa Stover, Banker's Trust Company

Call to Order

The Iowa College Student Aid Commission met for a regularly scheduled meeting on January 21, 2011. Commission Chair Adams called the meeting to order at 10:00 a.m. with a quorum present.

Minutes of the November 19, 2010

Motion: Commissioner Moore moved to approve the November 19, 2010 meeting minutes as written. Commissioner Donley seconded the motion which passed unanimously.

Executive Director's Report

Ms. Misjak introduced the new Director of Accounting for the Commission. Deb Krueger previously worked for the Department of Administrative Services where she was a Budget Analyst. Ms. Krueger said she has a Bachelor Degree in Applied Math from Grandview College and a Masters Degree in Accounting from Drake University.

Ms. Misjak said the agency has released the Iowa Financial Aid Application for the 2011-2012 academic year. The Application combines applications for six undergraduate student financial aid programs into one application process. From January 1 to January 18, 1,092 students have accessed the application.

House File 2531 was passed during the 2010 Legislative Session requiring the Governor's office to save \$83.7 million from the state's general fund during Fiscal Year 2011. Ms. Misjak said the Commission's share of the reduction totals \$60,946 and is 20 percent of the original \$310,843 appropriated to the Commission for administration of state programs. Ms. Misjak said the Commission will be changing some salary splits to help with the reduction.

Ms. Misjak said Commission staff has submitted a proposal to the US Department of Education for a grant to implement a Talent Search program in partnership with schools in Cedar Rapids and Des Moines. The proposal requested \$230,000 annually. Staff continues to search for grants to help bring new money into the State of Iowa to help serve students.

The financial literacy tool was launched this week and staff have provided training at schools in Indianola and Des Moines. This tool is only accessible through the I Have a Plan Iowa web portal.

Commissioner Donley presented Commissioners with the Board of Regents Annual Report brochure. The brochure is a synopsis of the first annual report. Commissioner Donley said the report talks about the legislative priorities for this year and the contributions to the Iowa economy. The full report is available on the Board of Regents website. Commissioner Donley said the next board meeting for the Board of Regents will be February 2 and 3, 2011 in Iowa City.

On February 3, speaker Don Norris will speak about what other states are doing on best practices, on collaborative efforts, and the programs that have been started this year. He will also talk about ways to expand access at a lower cost. This presentation will be streamed and available on-line. His presentation will tie neatly with the Board of Regents Strategic Plan. Speaker Nate Johnson will also talk about access and affordability. This presentation will also be available online.

Ms. Misjak said the Commission has been asked to present in to the Joint Education Appropriation Subcommittee on January 25, 2011. This presentation will focus on services and resources the Commission provides and the financial impact to the agency due to the elimination of the Federal Family Education Loan Program.

Postsecondary Registration Hamilton Technical College

Ms. Small said the matter of postsecondary registration of Hamilton Technical College was presented to Commissioners during the November meeting. At that time Hamilton Technical College had not yet developed requisite policies. Ms. Small said that all policies required for postsecondary registration with the State of Iowa are in place and staff is recommending approval of this application.

Motion: Commissioner Moore moved to approve the application for postsecondary registration for Hamilton Technical College. Commissioner Donley seconded the motion which passed unanimously.

Postsecondary Registration University of South Dakota

Ms. Small said the matter of postsecondary registration for University of South Dakota was presented to Commissioners during the November meeting. At that time Commissioners identifies three stipulations for approval. Ms. Small said that all policies required for postsecondary registration with the State of Iowa are in place and staff is recommending approval of this application.

Motion: Commissioner Denson moved to approve the application for postsecondary registration for the University of South Dakota. Commissioner Utman seconded the motion which passed unanimously.

Administrative Rules

Ms. Leeper recommended adoption of amendments to Administrative Rules Chapter 1 – Organization and Operations; Chapter 34 – Registered Nurse and Nurse Educator Loan Forgiveness Program; and Chapter 35 – Iowa Teacher Shortage Loan Forgiveness Program. During the November 2010 Commission meeting the Commission proposed changes to these rules.

Motion: Commissioner Denson moved the adoption and filing of amendments to Administrative Rules Chapter 1 – Organization and Operations; Chapter 34 – Registered Nurse and Nurse Educator Loan Forgiveness Program; and Chapter 35 – Iowa Teacher Shortage Loan Forgiveness Program. Commissioner Moore seconded the motion which passed unanimously.

Banker's Trust

Mr. Anderson introduced Melissa Stover from Banker's Trust Company and Jeff Birdsley from BTC Capital Management. Banker's Trust was selected as the administrator of the Trust Fund for GEAR UP Iowa. Ms. Stover said that Bankers Trust has partnered with GEAR UP Iowa on the website and has held lunch and learns. Mr. Birdsley gave a presentation on the performance of the funds and how the monies have been invested. They described their investment strategy. Mr. Anderson said the next scheduled draw down is April 16, 2011 for scholarship dollars to be invested in the Trust Fund.

Legislative Action Committee Report

Ms. Leeper said that five of the six bills the Commission proposed have been released as Senate Study Bills and an additional bill is expected on language contained in Iowa Code Chapter 714. In addition to the Commission's pre-filed bills, Ms. Leeper said she also watches bills related to the Commission or staffing for the agency. Ms. Leeper said she will continue to include links to the bills in the Weekly Report sent to Commissioners.

Commissioner Donley asked what Commission staff thinks about the House rule that would require lobbyists to get permission from the Governor's office prior to lobbying on a piece of legislature. Ms. Leeper said this will require more steps before being able to move forward on lobbying. Commissioner Quirmbach said it would severely hurt all elements of the process and that legislators rely on good communication with everyone. Commissioner Winckler added that legislators rely on information that lobbyists provide and, if lobbyists are not allowed to talk with legislators, it curtails the flow of information.

Ms. Small said Commission staff has received the initial draft of the Chapter 714 changes from the Legislative Services Agency. She told Commissioners that staff recommends changes to the draft language that would authorize the Commission to charge a fee to an applicant who files for an exemption to the requirement to file evidence of financial responsibility and that the revenue brought in from this fee be provided to the Commission to subsidize the administrative costs associated with postsecondary registration. Staff also recommends language that would require a school that must file evidence of financial responsibility to refile updated financial responsibility information at least every two years. Finally, staff believes language should be incorporated into the Iowa Code to give the Commission joint responsibility with the Iowa Attorney

General's office to write administrative rules for Chapter 714. Ms. Small said the recommended language is being reviewed by the Attorney General's office. When the language is received from the Attorney General's office, it will be sent to Commissioners for review. Ms. Leeper said there is 7 days from the time the Legislative Services Agency sends the draft to the time it must be resubmitted.

Motion: Commissioner Donley moved that the Legislative Action Committee be given authority to review the drafted language for Chapter 714 and authorize staff to submit that language to the Legislative Services Agency. Commissioner Moore seconded the motion which passed unanimously.

FY2011 Expenditure Summary

Ms. Misjak presented the FY11 Revenue and Expenditure Summary.

A redesign of the website is currently in progress and we are working on a micro-site for Legislators and Commissioners that will have reports that relate to data collected by the Commission. Staff has been tracking requests from Legislators and hopes this will be a great resource for them. This micro-site will have more information on the big picture things. Commissioner Quirnbach asked if a link will be provided on the Commissions main website. Ms. Misjak said a link will be placed on the website and the micro-site will be available for the public.

Commissioner Denson asked that the Commission receive a report on the contract with Xap Corporation. Information to be included is the budget and an update of the services provided. Ms. Misjak said this item will be placed on the March 2011 meeting agenda. Commissioner Denson also requested an update on the GEAR UP budget.

The Condition of Higher Education in Iowa

Ms. Doe presented to Commissioners the Condition of Higher Education in Iowa. This report was presented in draft form and when finalized will be available to the public on the Commission's website. Commissioner Moore requested the report be sent to all Commissioners for review.

Commission Adjourned at 12:15 p.m.

JANET ADAMS, CHAIR

TIMOTHY COLE, VICE CHAIR

IOWA COLLEGE STUDENT AID COMMISSION

Executive Director's Report March 2011

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The Iowa Financial Literacy Program is the newest component of the I Have A Plan Iowa™ web portal. The program was officially launched on February 9th with Governor Branstad's Press Conference at the Capitol. As of March 9, 2011, there were 42 schools and 1293 students using this program. CAL Community Schools, Latimer, Iowa, is 100% certified in the Iowa Financial Literacy Program and on the 15th of March, the Lt. Governor held a certification ceremony praising the efforts of this school. More than 135 educators and school administrators have participated in seven statewide webinars. One of the webinars was recorded and posted on the website so that anyone can attend training at their convenience. We continue to look for new ways to push this opportunity to all schools across the state and provide new services to Iowa students.

U.S. Department of Education Anticipated Visit-FISMA

During June 2010, the U.S. Department of Education held a Guaranty Agency Security Conference in Washington, DC. During this conference, USDE staff informed agency representatives of the importance of information security and the security measures that are necessary to avoid data tampering, fraud, disruptions in critical operations and inappropriate disclosure of sensitive information. As a follow-up to the meeting, guaranty agencies were subsequently requested to complete a series of Data Security and Records Management Checklists.

Recently, the Commission has been informed that the Department will conduct guaranty agency visits to discuss the answers provided in the checklists and to gain a better understanding of each agency's security status. Additionally, the Department will also provide assistance regarding data security and protection matters that it deems necessary after reviewing our agency's security protocols and other related materials.

The Commission has not yet been contacted we anticipate this visit will be scheduled in the near future.

2011-12 Financial Aid Application Update

The 2011-12 FAFSA and Iowa Financial Aid Application cycle has been underway since January 1, 2011.

As of March 2, 2011, over 3,300 Iowa students have completed the 2011-12 Iowa Financial Aid Application. Over 10,200 students and parents have accessed the eligibility wizard to determine their eligibility for state financial aid programs. Approximately 1,260 students had completed the 2010-11 Iowa Financial Aid Application on or before March 2 last year. The reasons for this enormous increase in applications is likely varied, but contributing factors may be increased internal marketing efforts to spread the word about our aid programs and the application to target audiences, the integration between the FAFSA and Iowa Financial Aid Application for Iowa residents, as well as increasing need for financial aid.

As of February 14, 2011 (the most recent date with dependable figures), 25,360 Iowa resident FAFSA (2011-12) applications listing an *eligible Iowa institution** had been submitted. At the same time last year, 23,005 2010-11 FAFSA applications had been submitted. This is a 10% increase in FAFSA applications during the first six weeks of the 2011-12 application cycle. It is too early to determine if this increase is due to the same FAFSA applicants filing earlier in the year or more Iowans completing the FAFSA application in general.

**eligible Iowa institutions are eligible for and currently participating in state-funded scholarship and grant programs*

All Iowa Opportunity Scholarship

Over the course of the last two months, staff has reviewed 2,649 individual AIOS applications to make initial eligibility determinations. Each of these applicants applied on or before March 1, 2011. Of these applicants, approximately 1,599 students met the baseline eligibility criteria.

During this time, staff has also been working with 332 individual high schools, 20 TRIO and EDOP centers, and the families of 15 home schooled applicants to certify GPAs and involvement in alternative high schools, alternative high school programs, TRIO programs, and Education Opportunity Centers. All applicant information should be certified by the outside parties within a week and a half of the March 1 priority application deadline. Staff will need to wait until the 2011-12 Regent tuition and fee rate is set prior to making award designations, as this rate effectively sets the eligible Expected Family Contribution and maximum award for the program.

The All Iowa Opportunity Scholarship is the 5th largest student financial aid program administered by our agency, receiving just over \$2.4 million in 2010-11 (approximately 4% of the total state appropriated funds that our agency administers annually). With no expected increase in the FY12 appropriation and an increasing maximum award (which adjusts each year to the average tuition and fee rate at the Regent Universities), we hope to assist approximately 470 Iowans with All Iowa Opportunity Scholarships in FY12.

IOWA COLLEGE STUDENT AID COMMISSION

Postsecondary Registration Issue Registration Fees

March 2011

RECOMMENDED ACTION:

Authorize staff to recommend an increase in the fee charged to a registered school under Chapter 261B.8.

Staff bring this issue to the Commission's attention prior to advancing a detailed proposal to amend administrative rules so that Commissioners have the opportunity to evaluate the registration fee issue.

This discussion focuses only on the fee that Iowa charges a registered school to operate in the state during its 4-year registration term. This is not an application fee, which Iowa Code does not explicitly support at this time. Staff will address application fees with Commissioners at a later date, provided proposed Iowa Code changes that allow for a separate application fee are enacted into law.

Background:

Iowa Code Section 261B.8 authorizes the Commission to set by rule and collect a nonrefundable initial registration fee and renewal of registration fee from each registered school (i.e., postsecondary credential-granting institution). Several Commissioners have expressed interest in evaluating the fee Iowa charges to a registered school and have requested information about what other states charge to postsecondary institutions that are registered or otherwise approved in that state.

Staff conducted an analysis of registration and licensure fees charged to postsecondary institutions by other states. See the attachment immediately following this document, which summarizes the fee structure in states for which staff were able to locate such information. In an effort to provide an "apples to apples" comparison of Iowa's registration fees with those in other states, and to account for a wide variety of states' policies on how and at what intervals fees are assessed, staff made some assumptions about enrollment numbers, tuition costs, numbers and types of postsecondary programs, and applied the same assumptions to states that charge fees based on tuition receipts, enrollment numbers, or types and numbers of programs. Most states charge fees on an annual basis. However, like Iowa, some states assess fees over a period of more than a year. For states that charge fees over a period of more than a year, staff determined the annual portion of the fee assessed for a longer period. Several states have very complex fee structures, which required interpretation by staff.

Conclusion

Staff discovered that there is a wide variance in the annual fee assessed to postsecondary schools that must be registered or licensed in other states, ranging from \$100 to potentially tens of thousands of dollars per year. Staff also noted that several states which charge relatively high fees or assess fees per program also perform more rigorous reviews of a postsecondary registration or licensure applicant, rather like an accrediting agency. Iowa

neither has the statutory authority nor the administrative capability for such an in-depth programmatic evaluation. Several states charge annual fees based on a school's tuition revenue. A few states charge annual fees based on enrollment numbers.

Fee Recommendation

Staff gave consideration to each different fee structure identified through this analysis. Fee structures based on tuition income or annual enrollments require data collection and calculations that are more administratively demanding. In light of staff's limited resources for administering the provisions of chapter 261B, staff recommend that – for the present – the Commission retain a flat registration fee that minimizes complexity.

Staff analysis of fee charges in 37 other states suggests that Iowa's registration fees are relatively low by comparison:

- The average annual registration or licensure fee for 38 states including Iowa is \$4719.00
- The median annual registration or licensure fee for 38 states including Iowa is \$2000.00

Staff believe the median – not the average – fee reflected in staff's analysis is a more accurate comparison point. Staff therefore recommend that the registration fee for the 4-year registration term be increased from \$4000 to \$8000 (an increase from \$1000 to \$2000 per year). Such an increase is comparable to annual flat, maximum, or estimated fees charged in the following states:

Alaska	\$2500 annual fee cap
Arkansas	\$2000 (estimated based on 10 baccalaureate programs)
Colorado	\$2000 (estimated based on 10 baccalaureate programs)
Florida	\$3000 (estimated based on 300 students)
Kansas	\$2800 annual flat fee
Missouri	\$2500 annual fee cap
Oregon	\$2075 annual fee cap
South Carolina	\$2750 annual fee cap
Utah	\$2000 annual fee cap
Virginia	\$2500 annual fee cap
Wisconsin	\$1950 (estimated based on tuition receipts)

POSTSECONDARY REGISTRATION FEES BY STATE

This chart summarizes available information about the fee structure of states that license or register postsecondary institutions that operate in that state. Several states have very complex fee structures; therefore, in some cases, the summary is based on staff interpretation of how the state's fee structure applies.

STATE	FEES	COMMENTS	INITIAL APPLICATION/ LICENSING FEE	AVERAGE YEARLY LICENSING/REGISTRATION RENEWAL FEE (Assumptions: One out-of- state school campus; 10 baccalaureate programs; 300 students; Tuition per year per student \$13,000
Alabama	Initial licensing fee \$250 for primary campus Annual renewal fee \$100 for primary campus + \$100 for each branch		\$250	\$100
Alaska	Exempt Application Fee \$100 Initial Authorization Fee \$2,500 Annual Renewal Fee \$500-\$2,500* New/Modify Program Fee \$100 Change in Location Fee \$100 Additional Site Inspection Fee \$100 Late Application Fee \$250	*Renewal fee is set at 3% of average tuition receipts during the most recent authorization period, no less than \$500 or more than \$2500	\$2500	\$2500

	Initial Agent's Fee \$100 Annual Renewal Agent's Fee \$100			
Arkansas	Initial institutional application fee \$3000 Program Certification 1-5 programs \$2500 Over 5 programs \$500 per program Annual Recertification 1-10 programs \$2000 Over 10 programs \$200 per program Notification fee \$250 Exemption Application fee \$250	Assesses an initial institutional fee plus additional fees for additional programs Renewal fees appear to be based on # of programs only	\$8000	\$2000
California	Initial application fee \$5000 Initial application fee for new branch \$3000 Initial application to operate by accreditation \$750 Renewal after 5 years: <ul style="list-style-type: none"> • \$3500 renewal fee main campus • \$3000 renewal fee branch campus • \$500 renewal fee institution approved to operate by accreditation Substantive change request \$500	Assesses an initial application fee, a renewal application fee every 5 years Also assesses annual fees based on school revenue, plus a flat annual branch fee	\$5000	\$25,750

	<p>Annual operation fee</p> <ul style="list-style-type: none"> • ¾ of 1 percent of annual revenue, not to exceed \$25,000 • \$1000 branch fee for each branch or campus operating in CA 			
Colorado	<p>Initial application \$2000 Initial application for new campus \$1000</p> <p>Annual renewal fee \$1000 renewal per school + \$1000 per campus</p> <p>\$100 per program or stand alone course \$100 program or stand-alone course revision</p> <p>\$150 initial in-state agent fee \$175 renewal in-state agent fee \$550 out-state agent fee per year \$400 change of location \$150 name change \$1500 change of ownership</p>	Assesses an institutional fee plus additional fees per program/per course fees	\$3000	\$2000
Connecticut	<p>Initial application fee \$2000 Annual renewal fee \$200 + \$200 for each branch \$500 annual agent fee</p>		\$2000	\$200
District of Columbia	<p>Initial and annual license renewal fee \$225 \$85 agent licensing fee per year</p>		\$225	\$225

<p>Florida</p>	<p>2 separate fees: Base fee and workload fee. Fees assessed annually</p> <p>Base fee Based on Florida student enrollment (per license issued) for the last reported fiscal year</p> <ul style="list-style-type: none"> • Level 1 = 0 to 100 students \$500 • Level 2 = 101-500 students \$1000 • Level 3 = 501-1000 students \$2000 • Level 4 = 1001 to 5000 students \$3000 • Level 5 = 5001 to 10,000 students \$4000 • Level 6 = over 10,000 students \$5000 <p>Initial Application for License, or Moving from Nondegree to Degree: New Nondegree Institutions \$2,000 + \$200 per program</p> <p>New Degree-Granting Institutions \$3,000 + \$200 per program</p> <p>Workload Fee Annual Review (see "Level" designations above, based on enrollments):</p>	<p>Assesses flat annual fees and an annual fee based on enrollments</p> <p>Also assesses fees for adding or modifying programs</p>	<p>\$5000</p>	<p>\$3000</p>
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	<ul style="list-style-type: none"> • Level 1 = \$1500 • Level 2 = \$2000 • Level 3 = \$5000 • Level 4 = \$7000 • Level 5 = \$8500 • Level 6 = \$10,000 <p>Institutions not Licensed by Means of Accreditation \$50 per licensed program (not to exceed \$500) as part of the Annual Review of License.</p> <p>Substantive Change Review \$1,000 Provisional or Annual Licensure Extension (first) \$500 Provisional or Annual Licensure Extension (second) \$750 Provisional or Annual Licensure Extension (third) \$1,500</p> <p>New Program or Program Modifications, Less than Substantive Change or More than One Minor Modification per Year: Nondegree Programs \$500 Degree Programs \$1,000</p> <p>Site Visits:</p> <p>One Visit per Year- included in licensure fee Subsequent Visits directed by Commission \$300 per day</p>			
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	Approval to Use "College" or "University", First Time or Special Review \$500 Annual Licensure of Recruiting Agents (nontransferable) \$200 Criminal Justice Information Investigation \$50			
Georgia	Initial application/evaluation fee <ul style="list-style-type: none"> • \$1000 non-degree • \$2000 2-year degree • \$3000 4-year degree • \$4000 graduate degree-granting school • \$5000 doctoral degree-granting school <p>\$1000 fee to evaluate request to elevate degree level</p> <p>Annual fee 2/10 of 1% of gross tuition; maximum \$25,000, minimums as follows:</p> <ul style="list-style-type: none"> • \$500 for non-degree granting school • \$1000 for degree-granting school 	Assesses initial application fees and annual fees based on income	\$3000	\$7800
Idaho	½ of 1% of gross Idaho tuition revenue annually, maximum \$500, minimum \$100	Assesses fees based on state-based income.	\$500	\$500
Indiana	School Application \$200.00 Agent Application 80.00 Certificate Fee 50.00 Degree Application 100.00		\$1250	\$200

	<p>Accreditation Renewal 100.00 Annual Agent Renewal 50.00 5-year Degree Renewal 100.00</p> <p>Inspection fee: In state: not to exceed \$500 Out of state: Reimbursement for expenses</p>			
Illinois	<p>Application \$5000</p> <p>Out-of-state certificate fee based on enrollment and level of program offering:</p> <p>Associate Less than 200 students \$1750 200-500 students \$1950 More than 500 students \$2250</p> <p>Bachelor Less than 200 students \$2450 200-500 students \$2650 More than 500 students \$2950</p> <p>Masters Less than 200 students \$3250 200-500 students \$3550 More than 500 students \$3950</p> <p>Doctoral/Professional Less than 200 students \$4500 200-500 students \$4750 More than 500 students \$5000</p>	<p>Available information suggests the application and certification fee are a one-time assessment and that renewal is not routinely required</p>	\$7900	<p>N/A, unless the school plans to change an existing program or increase the level of program offering</p>

	Letter of intent \$250 Program modification request \$250			
Indiana	\$200 application fee \$80 agent application fee \$100 for each degree \$100 annual institutional renewal \$100 annual renewal per program \$50 annual agent renewal		\$1200	\$1200
Iowa	Application fee – none Initial registration \$4000 Renewal every 4 years \$4000 Amendment fee \$1000 (change in location, accreditation, or program change requiring the approval of another state agency)		\$0	\$1000
Kansas	Out of State Schools <ul style="list-style-type: none"> • \$3400 initial certification non-degree granting • \$3800 initial certification degree-granting • \$2400 annual renewal non-degree granting • \$2800 annual renewal degree-granting • \$300 initial agent registration 		\$3800	\$2800

	<ul style="list-style-type: none"> • \$200 annual renewal agent registration 			
Kentucky	<p>Initial licensure of a school residing in Kentucky \$300</p> <p>Initial licensure of a school not residing in Kentucky, but doing business in Kentucky \$900</p> <p>Annual renewal fee for a school not residing in Kentucky \$900</p> <p>Permit for each agent employed by a licensed school \$150</p> <p>Transfer of ownership \$500 Name change \$100 Location change \$500 Approval to award associate degree \$500 per degree, not to exceed \$1000 per application New certificate or diploma program \$150</p>	<p>Assesses an initial licensure fee and annual renewal fees based on income for a school “residing” in Kentucky</p> <p>Also assesses additional fees to add programs</p>	\$900	\$900
Louisiana	<p>Initial application and license fee \$2,000</p> <p>Annual renewal application and license fee is based on the school's gross tuition revenues for the previous year:</p> <p>Under \$50,000 – \$500.00 \$50,000 and up – Greater of \$1,000</p>	<p>Assesses an initial application/licensure fee and an annual renewal fees based on income</p>	\$2000	\$9750

	<p>or .25% of gross tuition income</p> <p>Delinquent renewal application fee \$500.00</p> <p>Annual agent fee \$100.00.</p> <p>License reinstatement \$500.00</p> <p>Change of ownership application and license fee \$2,000</p>			
Maine	Unknown			
Maryland	<p>Initial application fee \$5000 per site for up to two degree programs + \$1000 for each additional program</p> <p>Annual renewal \$5000 per site for up to two degree programs + \$1000 for each additional program</p>	Assesses an institutional fee plus additional fees for additional programs	\$13,000	\$13,000
Massachusetts	<p>Initial application fee \$10,000 + \$2000 for each degree above one</p> <p>Annual renewal \$4000</p> <p>\$4500 to add a degree + \$2500 for each additional degree requested at the same time if more than one</p>	Assesses an initial institutional application fee plus additional initial application fees for additional programs	\$28,000	\$4000
Michigan	<p>Fees assessed annually</p> <p>Michigan adjusts annual fees based on the Detroit consumer price index, as published by the department of</p>	Assesses an initial permit fee and annual renewal fees based on enrollments	\$1305	\$1100

	<p>labor statistics, United States department of labor.</p> <p>Application fee for 10-11 \$1305 Solicitor fee for 10-11 \$360 - \$630</p> <p>Renewal license for a proprietary school that operates 1 or more instructional programs consisting of more than 40 hours of instruction shall pay a license renewal fee based on the following schedule of students who started licensed programs:</p> <ul style="list-style-type: none"> (a) 26 to 50 students \$500 (b) 51 to 100 students \$600 (c) 101 to 150 students \$700 (d) 151 to 200 students \$800 (e) 201 to 250 students \$900 (f) 251 to 300 students \$1,000 (g) 301 to 350 students \$1100 (h) 351 to 400 students \$1200 (i) 401 to 450 students \$1300 (j) 451 to 500 students \$1400 (k) More than 500 students \$1500 <p>New location \$300 Approval of new curriculum \$500 Change of school name \$200</p>			
Minnesota	<p>New School License Fee</p> <p>One Degree only</p> <ul style="list-style-type: none"> • \$2000 2-year • \$2500 4-year • \$3000 masters 	Assesses an institutional fee plus additional fees for additional programs	\$7000	\$1200

	<ul style="list-style-type: none"> • \$3500 doctoral <p>More than one degree or non-degree program</p> <ul style="list-style-type: none"> • Non-degree \$250 each • \$2000 + \$250 for each additional 2-year • \$2500 + \$500 for each additional 4-year • \$3000 + \$750 for each additional Graduate • \$3500 + \$1000 for each additional Doctoral <p>\$1200 annual renewal fee</p> <p>Fees for adding degrees (fee for each degree added) Non-degree \$250 Associate \$500 Baccalaureate \$500 Masters \$750 Doctoral \$2000</p>			
Mississippi	\$3000 annually		\$3000	\$3000
Missouri	Initial certification fee (for the year ending June 30) \$250 Subsequent years: \$.001 X net tuition and fee income for preceding year; minimum \$250, maximum \$2,500	Assesses an initial certification fee plus an annual fee based on income	\$250	\$2500
Montana	N/A – no licensing entity			
Nebraska	\$2625 application fee single program + \$200 per additional program	Assesses a flat institutional fee plus	\$4425	\$4700

	<p>Annual renewal \$2900 single program + \$200 per additional program</p> <p>Out-of-state schools (schools not physically operating in Nebraska): Certificate of Approval to Recruit \$1,149.98 Initial agent's permit for out-of-state schools \$229.99 Agent's permit renewal for out-of-state schools \$91.99</p>	additional fees for additional programs		
Nevada	<p>\$1500 institutional application fee \$1000 agent-only institutional application fee \$750 change in ownership \$500 add a program \$200 initial individual agent permit \$100 renewal individual agent permit</p> <p>Quarterly fee per student - \$4</p>	Assesses an institutional application fee plus quarterly fees based on enrollments	\$1500	\$4800
New Hampshire	<p>Application fee \$10,000 new out of state school establishing a branch in NH + \$3000 for approval of each program</p> <p>Annual fee Estimated or actual percentage of gross tuition, not to exceed 1%</p>	Assesses an institutional application fee plus additional fees for each program, and an annual fee based on income	\$40,000	\$39,000
New Jersey	Cost of consultants utilized and other out of pocket expenses incurred		Actual cost of institutional	Unable to determine

	License term determined on case-by-case basis, not to exceed five years		review	
New Mexico	<p>Licensed Schools (In-State Presence) Initial Licensure Degree Granting \$4,000 Non Degree Granting \$1,000</p> <p>Annual Licensure Renewal Less than \$50,000 annual gross tuition revenue \$500 \$50,000/\$249,999 annual gross tuition revenue \$1,000 \$250,000/\$499,999 annual gross tuition revenue \$2,000 \$500,000/\$999,999 annual gross tuition revenue \$3,000 Greater than \$1,000,000 annual gross tuition revenue \$5,000</p> <p>Site Visit \$250 Late Fee 20 day grace period, then \$100 each month</p> <p>Registered Schools (Out-of-State) Initial Registration \$ 1,000 Annual Registration Renewal \$ 1,000 Agent Fee \$200 Late Fee 20 day grace period, then \$100 each month</p> <p>Exempt Schools</p>	For out-of-state schools, assesses an institutional fee plus fees to add new programs	\$1000 (out of state)	\$1000 (out of state)

	<p>Initial Registration \$500</p> <p>Program Approval New Degree Program \$1,500 New Certificate Program \$750</p> <p>School Administrative Change Change of Ownership Degree Granting \$1,000 Change of Ownership Career School \$200 Change of Name \$100 Change of Location \$100</p> <p>Illegal Activity Illegal Operation May be assessed up to \$500 per day per violation</p>			
New York	Unknown			
North Carolina	<p>Initial Fee: \$5,000 Fee includes up to 4 degrees at the associate or bachelor's level or two degrees at the master's level or one degree at the doctoral or first professional level if reviewed at the time of initial application.</p> <p>Fee per degree program for additional degree Programs (initially or later): Courses \$500</p>	<p>Assesses an initial institutional fee plus additional fees for additional programs</p> <p>Assesses annual renewal fees based on number of programs</p>	\$14,000	\$6,000

	Associate \$1,000 Bachelor's \$1,500 Master's \$2,000 Doctoral/First Professional \$3,000 Annual Fees for existing programs: Courses only \$1,000 Number of Existing Degree Programs: 0-5 \$4,000 6-10 \$6,000 11-15 \$8,000 16-20 \$10,000 21-25 \$12,000 26-30 \$14,000 Over 30 \$16,000 Each Add. Site \$1,000			
North Dakota	Initial authorization \$2000 Annual renewal \$750 Career schools \$1000 initial fee Annual renewal \$750		\$2000	\$750
Ohio	None		N/A	N/A
Oklahoma	None, but school must pay for site visit		Expenses for site visit	N/A

Oregon	<p>Fees per degree:</p> <p>Limited instruction or program \$250 minimum; \$1000 maximum Associate degree \$2750 Bachelor degree \$4150 Masters degree \$4150 Doctoral degree \$5500</p> <p>Renewal 2-4 years</p>	Assesses fees based solely on level of program offering	\$4150	\$1037.50 - \$2075
Pennsylvania	Unknown		Unknown	Unknown
Rhode Island	<p>Application fee \$1000</p> <p>For profit renewal every 5 years Not for profit renewal indefinite</p> <p>New program addition requires new application</p>		\$1000	\$200
South Carolina	<p>Initial License fee: One-half of one percent expected gross tuition income Minimum \$150; maximum \$5,500</p> <p>Annual license renewal fee: One-half of one percent of last year's gross tuition income Minimum \$115.00; maximum \$2,750.00</p> <p>Late application filing fee: 10% of the</p>	Assesses fees based solely on expected or actual income	\$5,500	\$2,750

	<p>annual fee for each five-business-day period the report is past due Minimum \$50.00 Location change \$75.00 Add a program or site: One-half of one percent of the project additional gross tuition income for the first year Minimum \$75.00; maximum \$2,750.00 Program or school name change \$30 Agent permit \$30 Annual agent renewal permit \$30</p>			
South Dakota	<p>N/A No entity has jurisdiction over postsecondary institutions except public universities</p>		N/A	N/A
Tennessee	<p>Application Fees Initial New School Application \$3,000 Each Proposed Program \$500</p> <p>Associate Degree Granting Institutions (in addition to base initial application and program fee) \$1,000 Bachelor Degree Granting Institutions (in addition to base initial application and program fee) \$2,000 Masters Degree Granting Institutions (in addition to base initial application and program fee) \$3,000 Doctoral Degree Granting Institutions (in addition to base initial application and program fee) \$4,000</p> <p>Authority to Grant Degrees –</p>	<p>Assesses an initial institutional fee plus additional fees based on level of program offering</p> <p>Assesses an annual renewal fee based on the school's state-based income</p>	\$10,000	\$25,000

	<p>Unaccredited Institutions (in addition to base initial application, program and degree level fees) \$1,000</p> <p>New Programs – Authorized Institutions \$500 Degree Level Elevation – Authorized Institutions \$1,000</p> <p>Late Renewal Fee (in addition to base renewal fee) \$1,000 Renewal Extension Fee (in addition to base renewal fee) \$500</p> <p>Agent Fee In-State – Initial Application \$500 Agent Fee In-State – Renewal Application \$250</p> <p>Agent Fee Out-of-State– Initial Application \$600 Agent Fee Out-of-State– Renewal Application \$300</p> <p>Institutional Name Change \$500 Change of Address \$500 Non-compliance Fines (per day, per violation) \$500</p> <p>Reauthorization fees for in-state institutions are based upon an institution’s annual gross tuition revenue collected during the previous fiscal year (July 1 to June 30).</p>			
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	<p>Reauthorization fees for out-of-state institutions are based on an institution's annual gross tuition revenue collected from Tennessee students during the previous fiscal year (July 1 to June 30).</p> <p>The reauthorization fee equals .75% of the annual gross tuition collected with a minimum fee of \$500 and maximum fee of twenty-five thousand dollars \$25,000.</p>			
Texas	<p>Initial fee for a certificate of approval: Small school \$1,001 Other schools \$3,000</p> <p>Renewal Fees.</p> <p>For small schools, if a certificate of approval is issued for more than one year, the renewal fee is \$1,001, which may be paid with \$501 the first year and \$250 on the anniversary date of the certificate for each subsequent year.</p> <p>For all other schools, the renewal fee is based on the gross amount minus refunds of annual student tuition and fees. The Commission establishes the</p>	Assesses a renewal fee for most schools based on income	\$3,000	Unable to determine – based on administrative costs

	<p>renewal fee on an annual basis, based upon the cost of administration of the chapter.</p> <p>For all schools, the Commission shall assess a penalty of 10% of the renewal fee, not less than \$200 or more than \$1,000, if the school fails to file a complete application for renewal at least 30 days before the expiration date of the certificate of approval.</p> <p>Initial agent registration fee \$90 Annual agent renewal fee \$45</p> <p>School name or owner change \$150 Address change \$270 Agent change \$15.</p> <p>Application fee for course of instruction that is a seminar program \$35.</p> <p>Application fee for a school director, administrative staff member, or instructor \$20.</p> <p>Inspection fee for classrooms separate from the main campus \$375. Fee for an investigation of a complaint against a school \$400, if assessed.</p>			
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Utah	<p>½ of 1% of the expected gross income during the first year; minimum \$100, maximum \$2000</p> <p>Renewal unknown</p>	Assesses fees based solely on income	\$2000	\$2000 (if renewal is required)
Vermont	<p>\$1000 certification application + \$1500 for degree – granting approval</p> <p>Renewal 1-5 years</p>		\$2500	\$500 - \$2500
Virginia	<p>\$6000 initial application -- institution of higher education \$2500 initial application – career school</p> <p>\$6000 annual fee for all unaccredited institutions of higher education \$2500 annual fee for all unaccredited career schools</p> <p>\$2500 for all postsecondary schools with gross tuition collected greater than \$150,000 \$1500 annual renewal fee for postsecondary schools with gross tuition collected greater than \$100,000 but less than or equal to \$150,000</p> <p>\$1000 annual renewal fee for postsecondary schools with gross tuition collected greater than \$50,000 but less than or equal to \$100,000</p> <p>\$500 annual renewal for all schools</p>	Assesses and initial application fee and annual renewal fees based solely on income	\$6000	\$2500

	<p>with gross tuition collected less than or equal to \$50,000</p> <p>Fees nonrefundable with the exception of withdrawn application, which will be assessed a \$300 handling charge</p> <p>\$300 agent annual agent fee \$300 Initial or renewed exemption application</p>			
Washington	<p>\$2000 initial application</p> <p>\$1000 renewal application at least every 2 years</p>		\$2000	\$500 - \$1000
West Virginia	<p>\$2000 initial application</p> <p>\$500 annual report fee for school granted provisional status awaiting accreditation for up to 6 years \$200 annual report fee for all other schools</p>	Note maximum timeframe for school granted provisional status awaiting accreditation – 6 years	\$2000	\$200
Wisconsin	<p>Initial School Approval</p> <ul style="list-style-type: none"> • One nondegree program \$2,000 • One associate program \$2,500 • One baccalaureate program \$3,300 • One master's program \$3,900 • One doctoral program \$5,100 <p>Initial Approval – More Than One</p>	<p>Assesses initial and new approval fees on the programmatic level</p> <p>Annual renewal fees based on school income</p>	\$30,300	\$1950

	<p>Degree For each additional degree, the school pays:</p> <ul style="list-style-type: none"> • \$1500 if the program does not lead to a degree • \$2,000, for an associate level degree • \$3,000, for a 4-year degree • \$3500 for a master's level degree • \$4500 for a doctoral level degree <p>New/Revised Program</p> <ul style="list-style-type: none"> • Nondegree program \$ 1,500 • Associated degree program \$2,000 • Baccalaureate program \$3,000 • Master's program \$3,500 • Doctoral program \$4,500 <p>Annual Renewal Fee \$.50 per \$1000 of adjusted gross annual school income, not to exceed \$10,000.</p> <p>Annual Revision Fees</p> <ul style="list-style-type: none"> • Minor corrections \$ 200 • Major revisions \$ 1,000 <p>Additional Teaching Location \$ 200 Change of Ownership or Control \$ 1,000</p>			
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	Agent's Permit \$ 200 Annual Renewal of School and Program Approval <ul style="list-style-type: none"> • Active \$ 500 • Inactive \$ 100 			
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Staff estimated an annual registration or licensure fee (based on assumptions identified on page 1 in the column 4 header) for 38 states, including Iowa:

- The average annual registration or licensure fee for those 38 states is \$4719.00
- The median annual registration or licensure fee for those 38 states is \$2000.00

IOWA COLLEGE STUDENT AID COMMISSION

Postsecondary Registration Issue Full-Time Iowa Faculty Member/Program Coordinator

March 2011

RECOMMENDED ACTION:

Authorize staff to recommend to the Commission, as appropriate, a waiver of the full-time Iowa faculty member or program coordinator requirement for any registration applicant that does not meet this criterion and that proposes to offer programs exclusively via distance education or other nontraditional delivery method.

If the Commissioners approve the recommended action, staff will propose for the Commission's consideration a package of proposed administrative rule changes that includes this issue. Staff will recommend a modification of the current rule requiring a registered school to have a full-time Iowa faculty member or program coordinator so that it applies only to a registration applicant that proposes to offer a program(s) of at least an academic year in length via in-person instruction at a location(s) in Iowa.

Background:

There are three interactive issues that staff wish Commissioners to consider relative to this recommendation.

Full-time Iowa Faculty Member or Program Coordinator

Iowa Administrative Code Section 283-21.2 (261B), paragraph 5 requires the Commission to approve applicant schools that:

Enroll students who attend classes in Iowa and employ at least one full-time Iowa faculty member or program coordinator devoted to Iowa students

This requirement has been in place since at least 2004. According to registration records of the time, this rule was designed to ensure a minimum staffing commitment for Iowa registration. At the time when this rule was established, Iowa Code confined registration requirements to schools that offered correspondence courses in this state or that had a physical presence (i.e., a physical address) in the state.

Distance Delivery

In 2006, a change in federal law authorized access to federal student aid for schools that offered distance education programs and that were accredited by a nationally-recognized accrediting agency with distance education in its scope of accreditation. This change initiated a boom in programs offered via distance education. Effective July 1, 2009, a change in Iowa Code required the Commission to register, for the first time, a school that offers courses of instruction in Iowa via distance delivery. In July 2010, staff adopted a policy requiring a school that offers distance education programs to Iowans to register with the Commission if any aspect of the school's programs or operations require activity "on the ground" in Iowa. Commissioners previously approved the language of a proposed change to Section 261B.2 that is now being considered by the Iowa General Assembly in Senate File

125 that would codify the definition of “presence” for a school offering distance education programs:

“Presence” means a physical location in Iowa from which a school offers any portion of a course of instruction in person or by distance education or correspondence study, or conducts advertising, recruiting, enrollment, program coordination, administration, or any other activity related to the school’s operations.

Other Nontraditional Program Delivery Formats

For the purposes of an accredited program that is eligible for federal student aid, the U.S. Department of Education defines a week of instructional time as any period of 7 consecutive days in which at least 1 day of regularly scheduled instruction, examination, or preparation for examinations occurs. Schools are therefore permitted to offer in-person instruction in nontraditional ways. For example, a course schedule might allow a student to attend class all day one day per week, to earn the same number of credit hours that a traditional, on-campus student might earn by attending class for one hour, five days per week. Or, a course schedule might allow a student to attend class all day, five days per week, during a two-month period and earn the same number of credit hours for courses that might require an on-campus student’s attendance one hour per day for a full academic year. Programs that combine online with in-person instruction may accomplish the in-person component, e.g., a clinical, through an agreement with an organization (e.g., a hospital) that is overseen by school personnel, or through a consortium agreement with another postsecondary institution.

Issue

The full-time Iowa staff member or program coordinator requirement of administrative code is a reasonable and prudent expectation for a school that proposes to – as the administrative rule states, “enroll students who attend classes in Iowa” – on a full-time basis. Staff are concerned that this rule is outdated in the context of distance education and other acceptable nontraditional program delivery methods. Schools that offer programs using nontraditional formats are unlikely to be able to comply with the full-time Iowa faculty member requirement if the program’s delivery method does not justify offering full-time, year-round employment to an Iowa resident. Staff are also concerned that denying registration approval solely on this basis to a school that offers programs in nontraditional formats may be perceived as disadvantaging nontraditional students by limiting their options for postsecondary education.

Attached to this document is a chart that summarizes staff’s analysis of other states’ policies concerning faculty and instructors. No other state unconditionally requires a registration or licensure applicant to employ a full-time resident staff member. Oregon requires a school that does not have a full-time resident faculty member to provide additional information about the adequacy of faculty. While Hawaii requires a resident faculty member, it does not stipulate that the faculty should be full-time and Hawaii does not license distance education programs. Seven other states require any one of the following:

- A sufficient number of full-time instructors to achieve the course/program objectives, or
- At least one full-time faculty member or educational program supervisor (no residency requirement), or
- At least one full-time faculty member in each program, curricula, or discipline

**POSTSECONDARY REGISTRATION
FULL-TIME IOWA FACULTY MEMBER OR PROGRAM COORDINATOR**

The following chart contains an analysis of available law, rule, or policy in other states to address the following question:

*Does the state require a school, as a condition of licensure or registration, to maintain a **full-time** faculty member or other employee **located in that state**?*

STATE	YES	NO	LICENSES OUT-OF-STATE DISTANCE EDUCATION SCHOOLS?
Alabama		X	YES
Alaska		X	YES
Arkansas		X	YES
California		X	YES
Colorado		X	YES
Connecticut		X	YES, if certain "presence" applies (similar to Iowa)
District of Columbia		X	NO
Florida		X	YES
Georgia*		X	YES
Hawaii [§]		X	NO
Idaho*		X	NO
Indiana		X	YES
Illinois		X	YES
Kansas		X	YES
Kentucky		X	YES
Louisiana		X	YES, if certain "presence" applies
Maine		X	YES, if certain presence applies (almost exactly like Iowa)
Maryland*		X	YES, if certain presence applies
Massachusetts		X	NO
Michigan		X	YES, if recruiting in MI and not 4-year school
Minnesota		X	YES
Mississippi*		X	NO
Missouri			NO
Montana		N/A	N/A – no licensure authority
Nebraska		X	NO
Nevada		X	YES, if certain "presence" applies (similar to Iowa)
New Hampshire		X	NO
New Jersey*		X	YES, for hybrid courses
New Mexico		X	YES, if certain "presence" applies
New York		Unknown	NO
North Carolina		X	YES
North Dakota		X	YES

Ohio		X	YES, if certain “presence” applies
Oklahoma		X	YES, if certain “presence” applies
Oregon		X [±]	YES, if certain “presence” applies
Pennsylvania		X	YES
Rhode Island			YES, if certain “presence” applies
South Carolina*		X	NO
South Dakota		N/A	N/A – no licensure authority
Tennessee		X	YES
Texas		X	YES
Utah		X	NO
Vermont		X	YES
Virginia		X	YES
Washington		X	YES, if certain “presence” applies
West Virginia*		X	YES, if certain “presence” applies
Wisconsin		X	YES

* The state requires either:

- A sufficient number of full-time instructors to achieve the course/program objectives, or
- At least one full-time faculty member or educational program supervisor (no residency requirement), or
- At least one full-time faculty member in each program, curricula, or discipline

[±] If the school does not have at least one full-time teacher resident in Oregon or directly teaching Oregon students in each specialty, the school must demonstrate with specific examples the adequacy of faculty contribution to organizational integrity and continuity, academic planning, and resident student development.

[§]Hawaii’s consumer protection law requires an unaccredited institution to have a Hawaii resident employee (*full-time is not a requirement*), but Hawaii does not license or register such schools.

IOWA COLLEGE STUDENT AID COMMISSION

Vatterott College Application for Postsecondary Registration Amendment March 2011

RECOMMENDED ACTION:

Approve Vatterott College's application to amend its Iowa registration by adding an additional location, the College's Sunset Hills, Missouri campus, with the following stipulation:

Vatterott College must notify the Commission within 90 days of the establishment of a new externship or clinical location in Iowa for the Medical Assistant program offered through the Sunset Hills, Missouri campus.

Background

Iowa Code Section 261B.3 requires registration with the Commission for "a school that maintains or conducts one or more courses of instruction including courses of instruction by correspondence or other distance delivery method, offered in this state or which has a presence in this state and offers courses in other states or foreign countries. . .". Vatterott College is currently registered to operate in Iowa from its permanent physical location in Des Moines, Iowa.

Registration Amendment Purpose

Iowa Code Section 261B.3, subsection 1 states, "Registrations shall be renewed. . . upon any substantive change in location. . ." Vatterott College has applied for a registration amendment to add its Sunset Hills, Missouri, campus to the locations from which the College is authorized to offer courses of instruction to Iowans. Commission staff required Vatterott to seek this approval so that its Sunset Hills, Missouri, campus may offer an associate degree program that prepares students for entry level employment as a Medical Assistant in a format that is different than the format of the same program offered by the Des Moines campus. The Sunset Hills, Missouri campus of Vatterott College offers this program primarily through distance education but the program has an "on the ground" component that will take place in Iowa.

Students enrolled in the program must complete a 160-hour externship and a separate clinical experience, both of which will occur at various locations in Iowa. Vatterott College/Sunset Hills establishes formal relationships with hospitals or clinics for the externship requirement of the Medical Assistant program. For the clinical portion of the program, Vatterott College/Sunset Hills will establish an arrangement with an Iowa postsecondary institution (for example, a community college) that is accredited by an accrediting agency recognized by the U.S. Department of Education, and that has an accredited Medical Assistant program. Credits that students earn in the clinical experience at Iowa institutions will be transferred to the College's Sunset Hills, Missouri, program. Vatterott College/Sunset Hills will consider locations for the

externship and clinical portions of the program, in part, based on a student's needs and physical location.

At this time, Vatterott College/Sunset Hills has not solidified agreements with Iowa hospitals, clinics, or other Iowa postsecondary institutions for externship or clinical experiences pending the Commission's approval for its Sunset Hills, Missouri, campus to offer the Medical Assistant program to Iowans. For the purpose of disclosure to the public, Commission staff will require Vatterott College/Sunset Hills to disclose to the Commission the specific sites from which it will make available externship and clinical experiences in Iowa in compliance with Iowa Code Section 261B.5, which states, "If any information provided to the commission under section 261B.3 or 261B.4 changes, the school shall inform the commission within ninety days of the effective date of the change in the format specified by the commission."

Vatterott College/Sunset Hills also discloses that it will offer the following programs to Iowans exclusively through the distance education delivery method. Please note that, in and of themselves, these purely online program offerings do not invoke a requirement to amend Vatterott College's Iowa registration for the purpose of adding an additional location:

- Business Management – Associate of Occupational Studies
- Medical Billing & Coding – Associate of Occupational Studies
- Information Systems Security – Diploma
- Non-credit, non-credential professional development programs:
 - Your Role In the Green Environment
 - Better Green Business
 - Electronic Evidence Discovery

Tuition and fee charges for all programs that Vatterott College/Sunset Hills proposes to offer to Iowans are as follows:

- Business Management – Associate of Occupational Studies: \$23,900
- Medical Billing & Coding – Associate of Occupational Studies: \$29,750
- Medical Assistant – Associate of Occupational Studies: \$23,900
- Information Systems Security – Diploma: \$20,200
- Your Role In the Green Environment: \$325
- Better Green Business: \$325
- Electronic Evidence Discovery: \$1250

Registration Compliance

As required by Iowa Code Section 261B.4, Vatterott College disclosed its institutional policy on refunding tuition charges for withdrawn students by providing a copy of its Sunset Hills, Missouri, campus catalog. The College's tuition refund policy is not a registration criterion for registration; however, staff notes that Vatterott College's institutional tuition refund policy for

Iowa residents now meets the requirements of Iowa Code Section 714.23. See below under “Chapter 714 Compliance.”

Administrative rules specifically require the school to comply with the requirements of Chapter 261.9(1) “e” through “h”. (Note: Iowa Code Chapter 261.9(1)(h) does not exist.)

- 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. Staff verified that Vatterott College complies with the requirements of Iowa Code Section 261.9(1)(e) and (f), for both the Des Moines and Sunset Hills campuses, through disclosures provided by one or more of the following: the campus annual security report, the campus catalogue, a separate campus web site page devoted to the topic, or the campus financial aid office.
- 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 application review process for the Sunset Hills amendment, Vatterott College worked cooperatively with Commission staff to adjust an existing institutional policy for both the Des Moines and Sunset Hills campuses by including a provision that addresses the deployed servicemember’s spouse – who is a Vatterott College student – in a case when the servicemember and spouse have a dependent child. Commission staff have instructed Vatterott College to incorporate this policy into the catalog for both campuses and is awaiting confirmation of that publication. Vatterott College states it will implement the policy adjustment immediately.

On its registration application, Vatterott College affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school’s programs, charges, tuition refund policies; whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school’s accrediting agency. These disclosures are duplicative of the federal Department of Education’s student consumer information disclosure requirements for a school that participates in the federal student aid programs, and are provided in the catalog for each campus.

Vatterott College/Sunset Hills discloses its procedure for preserving student records:

Student records are locked in the Registrar's office for 5 years. After 5 years, the files are moved to a secure storage facility off-campus. At all times, files and records are kept in a secure location, protected against damage and loss.

Vatterott College/Sunset Hills provides contact information for Callie Sue Robinson whom students may contact for transcript information.

Vatterott College, as a currently registered institution, employs at least one full-time Iowa faculty member or program coordinator at its Des Moines campus.

Vatterott College/Sunset Hills discloses that it will comply with the provisions of Iowa Code Section 261B.7, which states, "Neither a school nor its officials or employees shall advertise or represent that the school is approved or accredited by the commission or the state of Iowa *nor shall it use the registration as a reference in promotional materials.*" Commission staff believe that, provided a school does not claim "approval" or "accreditation," the school serves the public's interests if it discloses that it is registered with the Commission, and provides contact information for the Commission to whom Iowa residents may direct inquiries or express concerns about the school. Commission staff request that the Commission permit this limited disclosure under the conditions described immediately above.

Vatterott College/Sunset Hills complies with the following additional registration requirements of administrative rules:

- Vatterott College submitted copies of an institution-wide audit conducted by independent auditing firm Ernst and Young, for the fiscal year ending December 31, 2009. The auditing firm expressed its opinion that the College's financial statements present fairly, in all material respects, the school's financial position.
 - A school 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." The auditing firm reports that Vatterott College did not meet the required composite score for the fiscal year ending December 31, 2009, and has posted a letter of credit with the U.S. Department of Education in the amount of \$28,544,625.00.
 - A for-profit institution is prohibited from deriving more than 90% of its revenue from Title IV aid. The Vatterott College/Des Moines campus disclosed that it derived 87.9% of its revenue from Title IV aid. The Sunset Hills campus is included a Vatterott College division labeled "Berkeley," which derived 88.02% of its revenue from Title IV aid.

- The application and campus catalog for the Sunset Hills campus provide sufficient substantiation that the campus maintains adequate learning and other resources and for the school's programs.
- Curriculum development and evaluation: Vatterott College discloses that it uses Program Advisory Committees that meet twice per year to provide input into curriculum and program delivery. Vatterott also has regular programmatic meetings in which faculty may provide input into curriculum.
- Vatterott College provided staff with a listing of faculty employed in the online programs that will be offered to lowans by the Sunset Hills, Missouri campus. Staff believe that Vatterott faculty possess sufficient degrees or experience that qualify them for their assignments.

Verifications

Commission staff independently verified the following facts that are pertinent to the registration eligibility of Vatterott College/Sunset Hills:

- Vatterott/Sunset Hills is not required to seek approval of the Iowa Board of Nursing or any other Iowa state agency for its Medical Assistant degree program.
- The federal Department of Education reports that Vatterott/Sunset Hills is currently accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC), an accrediting agency that the federal Department of Education recognizes and that includes distance education within its scope of accreditation.
- The ACCSC's online school directory confirms that Vatterott/Sunset Hills is an accredited location and in good standing. All programs that Vatterott/Sunset Hills proposes to offer to lowans are specifically accredited for delivery via distance education.
- The federal Department of Education reports that Vatterott/Sunset Hills is not subject to a limitation, suspension, or termination of its eligibility to participate in the federal student aid programs.

Additional Information

Vatterott/Sunset Hills disclosed the following additional information as required by the registration application. These data are provided for informational purposes only; they do not relate to registration criteria under Iowa Code or administrative rules.

- Federal Stafford Loan Cohort Default Rate (FFY 2008): 11.3%
 - FFY 2008 national average cohort default rate: 7%
- Average Debt Upon Graduation: \$21,421.00

- Graduation rate (percentage of first-time, full-time students who graduated within 150% of the normal time for program completion): 73%
- Procedure for resolution of student complaints – information for students with complaints or grievances is provided in the campus catalog

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Vatterott College submitted, with its registration amendment request, evidence that it meets the financial responsibility requirements of Iowa Code Section 714.18.

Section 714.23 – State Tuition Refund Policy

Iowa Code Section 714.23 requires “a person offering a course of instruction at the postsecondary level, for profit, that is more than four months in length and leads to a degree, diploma, or license...” to provide a refund of tuition to a student who withdraws from the school’s program in an amount that at least meets the formula specified in Section 714.23. During the registration amendment application review process, Vatterott College worked with Commission staff to adjust an existing tuition refund policy for Iowa residents who withdraw from either the Des Moines or Sunset Hills campus. Vatterott College’s policy complies with the provisions of Iowa Code Section 714.23. Staff are awaiting notification that the policy has been incorporated into the Des Moines and Sunset Hills campus catalogs for disclosure to students. Vatterott Colleges states that it will implement the adjustment to its tuition refund policy for Iowa residents immediately.

IOWA COLLEGE STUDENT AID COMMISSION

XAP Presentation March 2011

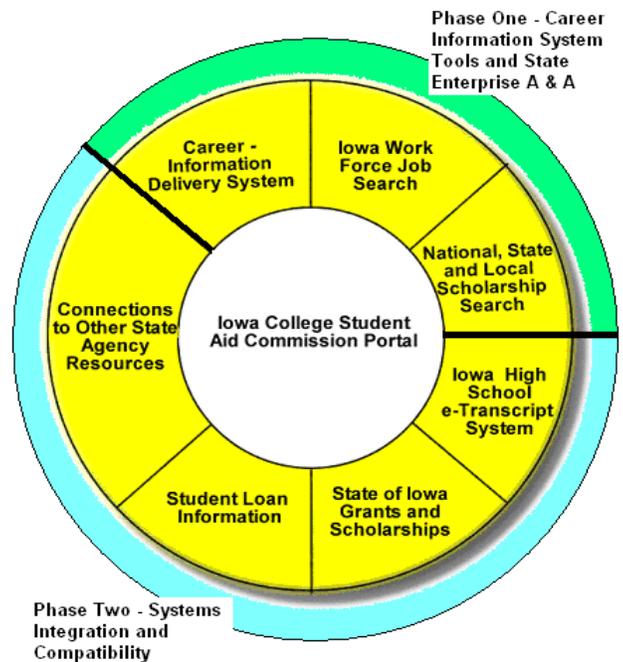
XAP was selected as the vendor for the state designated system for Career Information Delivery System. A presentation on the performance of the contract will be provided to Commissioners at the March 18, 2011 Commission Meeting.

Phase 1 – Delivered July 27, 2009

- Customized, configured and branded for Iowa
- Middle School, High School, Postsecondary Student
- Adult Learner and Workforce option
- Education and Career Planning
- Self-Assessment tools – Interest, Work Values, Transferable Skills, Basic Skills
- Off to Work – Employment Readiness Tools
- College Planning
- State Enterprise A&A single sign on

Career Information Delivery System

- Configured & customized with Iowa specific data
 - ✓ Iowa occupational information
 - ✓ Earnings and outlook by MSA & IWD area
 - ✓ Postsecondary information, programs and majors
- Integrated test prep
- Online admissions applications for postsecondary institutions
- Online application for the Commission’s student financial aid and grants, delivered by the Commission



Phase 2 – Under Development

System Integration and Compatibility

- Commission’s Scholarship and Grant System – **withdrawn from deliverables**
 - Replaced with PAWS – **under development, delivered complete April 1, 2011**
- Commission’s Data Warehouse
- Other State Agency Tools
- Iowa Dept of Education e-Transcripts
- State Enterprise e-Payment
- Iowa Student Information Systems
- Other Secondary or Post-Secondary Data Systems

Iowa College Student Aid Commission

**Legislative Action Committee
March 2011**

A legislative report will be provided during the March 18, 2011 Commission Meeting.

**IOWA COLLEGE STUDENT AID COMMISSION
GUARANTEED STUDENT LOAN ADMINISTRATION
SUMMARY OF RESOURCES AND EXPENDITURES
SFY 2011 as of February 28, 2011**

Operating Fund	Class	FY 2011 Operating Budget	FY 2011 Year to Date Budget	FY 2010 Feb-10 Mth Actual	FY 2011 Feb-11 Mth Actual	FY 2010 Year to Date Actuals	FY 2011 Year to Date Actuals	YTD Actual to Budget Variance
Revenues/Resources:								
Federal Account Maintenance Fees (AMF)		1,741,625	870,813	544,429	431,833	1,258,625	902,609	31,796
Federal Loan Processing Fee (LPIF)		-	-	459,696	-	1,389,130	110,395	110,395
Default Aversion Fees (DAF) (Net of rebates)		466,937	311,291	-	86,534	405,597	591,411	280,120
ICSAC Share Default Collections		5,024,068	2,930,706	-	2,012,526	2,727,603	5,084,314	2,153,608
Direct Loans Cons. (Net of 8.5% back to Fed Gov)		2,365,361	1,576,907	88,431	42,236	1,460,268	579,403	(997,504) *
Iowa Access Grants Funds		189,000	126,000	-	1,865	-	141,589	15,589
Interest on Operating Fund		127,500	85,000	12,216	5,052	81,260	46,084	(38,916)
Other Revenue (includes TOP)		865,000	576,667	1,375	1,018	18,093	72,700	(503,967)
Est PLP Rev		263,046	175,364	22,278	23,338	175,364	474,615	299,251 *
Choices Receipts (\$250K from Def Aversion Fund)		-	-	-	-	-	-	-
Grant DrawDown from USDE		-	-	-	-	-	-	-
State Appropriation		-	-	-	-	-	-	-
Total Revenues/Resources		\$ 11,042,537	\$ 6,652,748	\$ 1,128,425	\$ 2,604,402	\$ 7,515,941	\$ 8,003,119	\$ 1,350,371
Expenditures:								
Personal Services - Loan Administration		3,057,733	2,038,489	243,156	224,632	2,047,187	1,867,763	(170,726)
Personal Services - CHOICES		-	-	9,016	-	81,857	-	-
Travel		93,722	62,482	4,786	4,970	36,377	34,833	(27,649)
Office Supplies		33,675	22,450	687	730	25,806	20,546	(1,904)
Equipment Repairs		3,500	583	-	112	1,601	595	12
Printing and Binding		104,669	69,780	2,282	413	133,617	63,656	(6,124)
Postage		24,908	16,605	1,911	722	18,934	27,510	10,905
Communications		46,648	31,099	3,117	2,248	31,963	23,636	(7,463)
Rentals		56,661	56,661	14,331	-	114,728	56,661	-
Professional & Scientific Services		44,500	29,667	2,234	1,487	29,115	11,790	(17,877)
Outside Services - SLMA		1,784,026	1,189,351	92,027	103,942	1,204,754	864,575	(324,776)
Outside Services - iLink		-	-	-	-	225,850	-	-
Outside Services - SLCS		445,000	296,667	40,561	50,060	485,948	375,285	78,618
Outside Services - Other		459,003	306,002	2,247	2,593	35,288	37,670	(268,332)
Intra-State Transfers		-	-	-	-	675	675	675
Advertising & Publicity		130,475	86,983	15,739	3,733	169,553	33,772	(53,211)
Attorney General		14,100	9,400	1,175	1,250	8,196	7,975	(1,425)
State Audits		27,200	13,600	19,156	9,147	18,073	14,926	1,326
State Reimbursements - Rent		28,035	10,513	-	4,406	-	13,219	2,706
State Reimbursements - Other		25,185	16,790	1,022	791	11,923	9,589	(7,201)
ITE Reimbursements		261,275	174,183	5,246	12,322	33,940	181,233	7,050
Equipment		-	-	-	-	-	42	42
Office Equipment		5,000	3,333	-	178	2,013	214	(3,119)
IT Equipment & Software		34,900	23,267	(1,324)	4,912	19,925	9,928	(13,339)
Other Expenses & Obligations		28,958	19,305	53	283	23,041	18,907	(398)
Licenses		-	-	-	-	-	-	-
Other Refunds		-	-	-	-	24,333	-	-
State Aid		1,680,000	-	-	-	-	-	-
Total Administrative		\$ 8,389,174	\$ 4,477,210	\$ 457,422	\$ 428,931	\$ 4,784,700	\$ 3,675,000	\$ (802,210)
Collection Expense		4,920,244	3,280,163	1,131,536	324,618	3,387,362	3,122,093	(158,070)
Collection Expense - PLP		12,000	8,000	708	14,723	0	278,880	270,880
Total Collection Expenses		\$ 4,932,244	\$ 3,288,163	\$ 1,132,244	\$ 339,341	\$ 3,387,362	\$ 3,400,973	\$ 112,810
Total Operating Expenses		13,321,418	7,765,373	1,589,666	768,272	8,172,061	7,075,973	(689,400)
Federal Default Fee		1	1	1,201,745	0	4,634,135	31,769	31,768
Total Federal Default Fee		\$ 1	\$ 1	\$ 1,201,745	\$ -	\$ 4,634,135	\$ 31,769	\$ 31,768
Total Expenditures		\$ 13,321,419	\$ 7,765,374	\$ 2,791,411	\$ 768,272	\$ 12,806,197	\$ 7,107,742	\$ (657,632)
Net Gain(Loss)Operating Fund		\$ (2,278,882)	\$ (1,112,626)	\$ (1,662,986)	\$ 1,836,130	\$ (5,290,256)	\$ 895,377	\$ 2,008,003

*Estimated

This report is based on I-3 cash figures with estimates of Rev for Direct Loan Consol and PLP

11-03-F1

**IOWA COLLEGE STUDENT AID COMMISSION
SCHOLARSHIP & GRANT ADMINISTRATION
SUMMARY OF EXPENDITURES
SFY 2011 as of February 28, 2011**

	<i>FY 2010</i>	<i>FY 2011</i>	<i>FY 2011</i>	<i>FY 2011</i>	<i>Variance</i>	<i>Adjustments</i>
	<i>Actual</i>	<i>Budget</i>	<i>Year to Date</i>	<i>Year to Date</i>	<i>Over</i>	
			<i>Budget</i>	<i>Actual</i>	<i>(Under)</i>	
Expenditures:						
Salaries ¹	\$ 270,410	\$ 219,455	142,099	\$ 149,146	\$ 7,047	
Travel	493	1,569	1,046	\$ 268	\$ (778)	
Office Supplies ⁵	1,845	1,500	1,000	\$ 1,407	\$ 407	
Equipment Repairs	135	200	133	\$ 46	\$ (87)	
Printing	1,757	1,500	1,000	\$ 1,469	\$ 469	
Postage	4,703	3,500	2,333	\$ 2,211	\$ (122)	
Communications	2,013	1,500	1,000	\$ 2,633	\$ 1,633	
Rental ⁶	15,718	5,588	5,588	\$ 5,588	\$ -	
Outside Services ^{4,5}	1,062	2,688	1,792	\$ 2,084	\$ 292	
State Transfers	-	75	75	\$ 75	\$ -	
State Reimbursements - Rent ^{2,6}	1,593	3,477	1,304	\$ 1,305	\$ 1	
State Reimbursements - Other		1,497	998	\$ 894	\$ (104)	
ITD Reimbursements ³	7,336	6,995	4,663	\$ 4,250	\$ (413)	
Office Equipment ²	10	-	-	\$ -	\$ -	
IT Equipment & Software ^{2,3,4}	171	300	200	\$ -	\$ (200)	
Other Expenses & Obligations	6	53	35	\$ 6	\$ (29)	
Total Expenditures	\$ 307,252	\$ 249,897	\$ 163,267	\$ 171,382	\$ 8,115	

1 - Adjusted salaries' budget downward by \$60,946 for the SERIP, EO20, SF2088 and other savings that were returned to the General Fund.

2 - Adjusted budget by \$712 in class 414 for office rent; \$200 came from class 502 - Office Equipment and \$512 from class 510.

3 - Budget reflects expected purchase of Smart Board for Commission Board Room. Estimated cost of \$5,000.

4 - Adjusted 406 - Outside Services budget by \$2,188; \$1,688 from class 510 - IT Equipment & Software, \$500 from class 301.

5 - Adjusted 301 - Office Supplies budget by -\$500; Outside Services to exceed budget

6 - Adjusted 402 - Rental to reflect move to capital campus in FY11. Rent to be expended from class 414 - State Reimbursements.

**IOWA COLLEGE STUDENT AID COMMISSION
 DEFAULT PREVENTION, FUND #0261
 SUMMARY OF RESOURCES AND EXPENDITURES
 SFY 2011 as of February 28, 2011**

	FY 2011 Budget	FY 2011 Year to Date Budget	FY 2011 Year to Date Actuals	Variance
Resources:				
Interest	\$ 12,750.00	\$ 8,500.00	\$ 4,417.00	\$ (4,083.00)
Refunds & Reimbursements	\$ -	\$ -	\$ 687.00	\$ 687.00
Total Resources	\$ 12,750.00	\$ 8,500.00	\$ 5,104.00	\$ (3,396.00)
Expenditures:				
Travel/State Vehicle	\$ 8,270.00	\$ 5,513.33	\$ -	\$ (5,513.33)
Office Supplies	\$ 500.00	\$ 333.33	\$ -	\$ (333.33)
Printing & Binding	\$ 10,000.00	\$ 6,666.67	\$ -	\$ (6,666.67)
Professional & Scientific Services	\$ 250,000.00	\$ 166,666.67	\$ -	\$ (166,666.67)
Outside Services	\$ 15,000.00	\$ 10,000.00	\$ -	\$ (10,000.00)
Advertising & Publicity	\$ 1,000.00	\$ 666.67	\$ -	\$ (666.67)
ITD Reimbursement	\$ -	\$ -	\$ -	\$ -
IT Equipment & Software	\$ -	\$ -	\$ -	\$ -
Aid to Individuals	\$ -	\$ -	\$ -	\$ -
Total Expenditures	\$ 284,770.00	\$ 189,846.67	\$ -	\$ (189,846.67)
Net Gain(Loss)	\$ (272,020.00)	\$ (181,346.67)	\$ 5,104.00	\$ 186,450.67
Default Prevention Fund Balance 6/30/10	\$ 1,705,408.33			
**Estimated Net Gain/(Loss) SFY 2011 02/28/11	\$ 5,104.00			
**Estimated Fund Balance 02/28/2011	\$ 1,710,512.33			

**Estimated due to cash basis, no adjustments made for accrued expenses or revenues

**IOWA COLLEGE STUDENT AID COMMISSION
GEAR UP IOWA GRANT
SUMMARY OF EXPENDITURES
SFY 2011 as of February 28, 2011**

Annual Federal Grant of \$1,400,000 for administrative costs.

Additional, annual grant for \$1,400,000, which is placed in a trust fund to provide scholarships to college for participants.

The mission of GEAR UP Iowa is to significantly increase the number of low-income students who are prepared to enter and succeed in postsecondary education.

GEAR UP Iowa is a year-round program where students will discover the importance of education, improve academic skills, identify career interests, and explore college opportunities.

The program will serve 7th grade students (7th graders in the 2008-2009 academic year) at 31 Iowa schools and provide resources to these students as they progress from 7th to 12th grade, helping them plan, prepare and pay for college.

	FY 2010	FY 2011	FY 2011	FY 2011	Variance
	Actual	Budget	Year to Date	Year to Date	Over
			Budget	Actual	(Under)
Expenditures:					
Direct Costs ¹:					
Salaries ³	189,178	184,395	122,930	77,260	(45,669)
Travel ³	19,743	39,426	26,284	11,411	(14,873)
Office Supplies	3,597	500	333	1,297	964
Printing ³	338	12,600	8,400	-	(8,400)
Postage ³	86	10,500	7,000	4	(6,996)
Communications ³	3,676	13,200	8,800	2,145	(6,655)
Professional & Scientific Services	20,113	20,000	13,333	-	(13,333)
Outside Services	673	10,000	6,667	1,472	(5,195)
School Reimbursements, DE Contract & Add'l Programming ³	792,787	1,610,751	1,073,834	577,999	(495,835)
Advertising & Publicity	3,874	11,700	7,800	6,602	(1,198)
State Reimbursements - other than Rent	1,045	2,100	1,400	445	(955)
ITE Reimbursements	3,911	1,000	667	527	(139)
Licenses	314,500	359,580	239,720	100,000	(139,720)
Total Direct Costs	1,353,519	2,275,752	1,517,168	779,163	(738,005)
Indirect Costs ²:					
Salaries	36,783	30,772	20,515	14,626	(5,889)
Rental (Office space)	6,877	4,244	2,829	4,244	1,415
School Reimbursements & DE Contract		19,200	12,800		(12,800)
Attorney General	1,004	900	600	775	175
State Audits	2,307	2,100	1,400	475	(925)
State Reimbursements - Rent	-	2,100	525	990	465
ITE Reimbursements	877	2,432	1,621	1,928	306
IT Equipment & Software	1,199	500	333	-	(333)
Total Indirect Costs	49,047	62,248	40,624	23,037	(17,586)
Total Expenditures	1,402,566	2,338,000	1,557,791	802,200	(755,591)

1 - Direct costs are costs that are directly associated with administering the grant plan, such as licenses, costs incurred by schools and programs for participants.

2 - The grant allows for up to 6% of the grant proceeds to be used to cover indirect costs. Indirect costs are costs that are indirectly associated with administering the plan, such as office space and audits, that are not easily allocated to a business unit.

3 - Carryforward in the amount of \$938,000, which was allocated to: Salaries - \$15,000; Travel - \$16,000; Printing - \$10,000; Postage - \$10,000; Communications - \$9,200 and School Reimbursements - \$877,800.



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