

**Iowa College Student Aid Commission
November 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

November 18, 2011

10:00 AM

Iowa College Student Aid Commission
Conference Room

- * 1. Minutes of Meeting Tab A
 - September 16, 2011 Commission Meeting
 - October 20, 2011 Special Commission Meeting

- 2. Executive Director’s Report Tab BMisjak

- * 3. Administrative Rules Tab CLeeper

- * 4. External Collection Management Contract Extension..... Tab DPulley

- * 5. Postsecondary Registration..... Tab ESmall
 - Ashford University
 - South University
 - Western Governor’s University
 - Nebraska Wesleyan University
 - Grand Canyon University
 - Postsecondary Registration Discussion

- 6. Committee Reports Tab F
 - *- Legislative Committee Report..... Adams

- 7. Staff ReportsTab G
 - FY 12 Revenue and Expenditure Summary.....Krueger
 - NASSGAP ReportBrown

- 8. Adjourn

* Indicates Action Item

Upcoming Meetings:

Unless otherwise indicated, meetings will begin at 10:00 a.m. and conclude by 2:00 p.m.

January 20, 2012

March 16, 2012

May 18, 2012

IOWA COLLEGE STUDENT AID COMMISSION

MINUTES OF MEETING

September 16, 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 | Rob Denson |
| Bob Donley | Crystal Ford |
| Randy Feenstra | Ron Jorgensen |
| Fred Moore | Herman Quirnbach |
| Doug Shull | Kelli Todd |
| Cindy Winckler | |

Members Absent:

| | |
|-----------------|-------------|
| Terrence Martin | Roger Utman |
|-----------------|-------------|

Staff Present:

| | |
|--------------|---------------|
| Todd Brown | Deb Krueger |
| Julie Leeper | Karen Misjak |
| Bobbi Pulley | Carolyn Small |
| Ashley Wendt | |

Attorney General Present:

David Van Compernelle

Guests Present:

Dr. Louis Burgher, Clarkson College
Patrick Durbin, Georgetown University
Kim Hoyt, University of Southern California
John Parker, Iowa Student Loan
Dan Richins, Ashford University
Linda Schwinn, Capri College
Kathy Weinberg, Iowa Board of Nursing
Jody Woodworth, Clarkson College

Call to Order

The Iowa College Student Aid Commission met for a regularly scheduled meeting on September 16, 2011. Commission Chair Adams called the meeting to order at 10:00 a.m. with a quorum present.

Minutes of Meeting

Motion: Commissioner Shull moved to approve the July 15, 2011 Meeting Minutes as written. Commissioner Denson seconded the motion which passed unanimously.

Executive Director's Report

Ms. Misjak said the U.S. Department of Education had released the FY2009 Cohort Default Rates. The Commission's official FY 2009 Default Rate is 7.0% with the national average being 8.8%.

Spiros Protopsaltis and Laura Sands from Senator Tom Harkins office met with Karen Misjak and Janet Adams on Thursday. The meeting was to introduce themselves and to discuss services provided by the Commission.

Commission staff will be launching Buttonwood™, the college level personal finance and student loan management platform, we contracted with EverFi to provide. It will be live through I Have A Plan Iowa™ on Monday, September 19, 2011. Ms. Misjak said Lt. Governor Kim Reynolds will announce the launch during her weekly press conference on September 19, 2011. Ms. Misjak confirmed four schools have committed to using the program, Drake University, St. Ambrose, Kaplan, and Senator Quirnbach will be using it at Iowa State. Ms. Misjak said staff has meetings set up with Buena Vista and DMACC in the weeks to come to discuss implementation on their campuses. Senator Quirnbach requested a phone call to discuss how to get this into colleges as soon as possible. Representative Winckler would also like to participate in this conversation.

Mr. Brown presented a summary of the findings of the Iowa Teacher Shortage Loan Forgiveness Program Survey. Ms. Misjak said she is planning to share the summary with Jason Glass during her September 26, 2011 meeting.

ME&V Contract Extension

Ms. Misjak said we entered into the contract with ME&V in 2009. They help Iowa College Aid with publication design and layout and with our website. Staff asked the Commissioners to authorize a one-year extension of the Public Relations and Communication Services Contract with ME&V. Commissioner Denson asked how much the Commission has paid ME&V in the last 3 years. Ms. Misjak said last year we paid \$38,018.00 and the year before was \$40,109.06. The Commission cannot exceed \$100,000 in annual payments for ME&V contract services.

Motion: Commissioner Donley moved to authorize staff to exercise the option for a one-year extension of the Public Relations and Communication Services Contract with ME&V. Commissioner Denson seconded the motion which passed unanimously.

Default Aversion Assistance Services Contract Extension

Ms. Pulley said default aversion assistance is required in order to help prevent the loans from defaulting. Our current contract with Student Loan Counseling Services (SLCS) produces revenue for the Commission. Staff is requesting to extend the contract with SLCS.

Commissioner Quirnbach said that the numbers are pretty impressive.

Motion: Commissioner Ford moved to authorize staff to extend the Default Aversion Assistance Services contract with Student Loan Counseling Services. Commissioner Donley seconded the motion which passed unanimously.

Postsecondary Registration-Nursing Board

Ms. Small introduced Kathy Weinberg from the Iowa Nursing Board. Ms. Weinberg said the board has the authority to regulate nursing programs in Iowa; currently they do not approve out-of-state nursing programs and out of state programs do not go through the process that the in-state programs do. They request that any faculty member teaching in Iowa have an Iowa Nursing License or be recognized for licensure under the nursing compact in Iowa Code Chapter 152E. Ms. Weinberg said that online programs are typically for students who are already Registered Nurses and wish to further their education with a baccalaureate or masters degree. Either type of program may include a clinical component which they can complete in Iowa under a contract that the school must execute with the clinical agency.

Senator Quirnbach said that the Commission counts on people that are knowledgeable in their specialized areas to help with guidance on approvals of postsecondary registrations for academic merit.

Postsecondary Registration-Georgetown University

Motion: Commissioner Donley moved to approve Georgetown University's application for postsecondary registration in Iowa with a waiver of the full-time, Iowa resident faculty member or program coordinator requirement of administrative rules. Commissioner Ford seconded the motion which passed unanimously.

Postsecondary Registration-University of Southern California

Ms. Small said staff is requesting to table the registration for the University of Southern California until the November 2011 Commission Meeting. Senator Quirnbach said by statute we

need to make a decision today on this and making a motion to table the registration is not considered taking action. Chair Adams said that a special Conference Call meeting will be scheduled for the first part of October to take action on this registration prior to the October deadline. No action made today.

Postsecondary Registration-Clarkson College

Ms. Small said Clarkson College will need a waiver of the full time faculty member in the State of Iowa requirement. They have three part-time faculty members but no full-time employees.

Motion: Commissioner Shull moved to approve Clarkson College's application for postsecondary registration in Iowa with a waiver of the full time resident faculty member. Commissioner Ford seconded the motion which passed unanimously.

Dr. Louis Burgher complimented Carolyn Small on how she guided them through the registration process.

Legislative Action Committee

Ms. Leeper said staff is requesting to move forward with presenting the Chapter 261B language to the Department of Management for approval. Senator Quirnbach asked if staff would be promoting this language during the legislative session. He also asked if staff had a handle on what the issues were in the house and why Representative Forristall did not bring it forward to the floor last year. Representative Jorgensen said he would work with Representative Forristall during the next session. Senator Feenstra said he would also work with Senator Quirnbach.

Motion: Commissioner Shull moved to approve staff to move forward with presenting the Chapter 261B language to the Department of Management for approval. Commissioner Donley seconded the motion which passed unanimously.

Staff Reports

Ms. Krueger presented the administrative budget and expenditure summary and shared the Program Administration Final Expenditures for FY11 as well as the State FY13 Budget.

Commission Adjourned at 11:15am.

JANET ADAMS, CHAIR

CRYSTAL FORD, VICE CHAIR

IOWA COLLEGE STUDENT AID COMMISSION

MINUTES OF MEETING

October 20, 2011

2:00 p.m.

Via Telephone Conference Call

Members Present:

| | |
|-------------|--------------|
| Janet Adams | Rob Denson |
| Bob Donley | Crystal Ford |
| Fred Moore | Doug Shull |
| Roger Utman | |

Members Absent:

| | |
|-----------------|------------------|
| Randy Feenstra | Ron Jorgensen |
| Terrence Martin | Herman Quirnbach |
| Kelli Todd | Cindy Winckler |

Staff Present:

| | |
|---------------|--------------|
| Deb Krueger | Karen Misjak |
| Carolyn Small | Ashley Wendt |

Guests Present:

Kim Hoyt, University of Southern California

Call to Order

The Iowa College Student Aid Commission met for a special telephone conference call meeting on October 20, 2011. Commission Chair Adams called the meeting to order at 2:00 p.m. with a quorum present.

Postsecondary Registration- University of Southern California

Motion: Commissioner Shull moved to approve the University of Southern California's application for postsecondary registration in Iowa with a waiver of the administrative rule requirement for a full-time Iowa resident faculty member or program coordinator. Commissioner Ford seconded the motion which passed unanimously.

Commission Adjourned at 2:08 p.m.

JANET ADAMS, CHAIR

CRYSTAL FORD, VICE CHAIR

IOWA COLLEGE STUDENT AID COMMISSION

Executive Director's Report November 2011

Strategic Plan

Agency staff are developing an update of the Iowa College 2010-2013 Strategic Plan. This 2012 update will build on the framework of the agency's four-year plan. The purposes of the update process are to bring strategies, action steps, and measures current as necessary and to adapt pertinent elements to Governor Branstad's goals. We plan to have the update completed by early December.

GEAR UP IOWA Success Center

As GEAR UP Iowa cohort student's progress on their path to postsecondary success, one key benchmark is earning sufficient credits each year to remain on track for high school graduation with the rest of Iowa's high school class of 2014. Data available from the Iowa Department of Education indicates that much room for improvement exists in school districts served by GEAR UP Iowa, as the four-year graduation rate in those districts, combined, was 78.9% in 2010.

In order to assist district endeavors to positively impact the four year graduation rate among the GEAR UP Iowa cohort class of 2014, early intervention efforts are moving forward to bolster credit and component recovery initiatives in GEAR UP Iowa schools state-wide. One outside-the-box initiative funded by the GEAR UP Iowa federal grant will provide sophomores from Des Moines East High School with an opportunity to get back on track via a "store front" extended learning lab. Outfitted with the latest 21st Century technology, the **GEAR UP Iowa Success Center**, located on the first floor of the Iowa Building, will provide a safe and welcoming environment for online component and credit recovery using E2020's online system as well as college access programming for more than 120 Des Moines East students who have been identified as credit deficient or are failing classes due to low attendance rates this semester.

Des Moines East department lead teachers will provide each credit deficient GEAR UP Iowa cohort student with a prescription for academic success. Counselors and school administrators will also present a "contract" to parents or guardians of these students which in effect states that the student will utilize the Success Center during prescribed hours to get back on track between the hours of 7:40 a.m. and 7:40 p.m. Monday, Tuesday, Thursday, Friday and then Saturday mornings at the facility. Students will also be allowed to utilize this

facility for homework help, tutoring, and other college access programming as they progress toward high school graduation. The project is being piloted with Des Moines East High School due to its proximity in relation to the Iowa Building and will be expanded to serve students from all other Des Moines Public High Schools once the system for serving students is refined.

Other schools and districts around the state have expressed interest in additional credit recovery and component recovery initiatives in partnership with GEAR UP Iowa to move cohort students forward on their path to postsecondary success. Council Bluffs, Cedar Rapids, Davenport, Waterloo, and Sioux City Community School Districts are currently refining plans to leverage GEAR UP Iowa funds to minimize the number of cohort students who remain credit deficient following their sophomore year of high school.

IOWA COLLEGE STUDENT AID COMMISSION

Administrative Rules November 2011

RECOMMENDED ACTION:

Move to propose changes to the Commission's Iowa Administrative Rule Chapter 14, "Iowa Osteopathic Physician Recruitment Program".

House File 645, which was passed by the General Assembly during the 2011 Legislative Session, provided appropriations for the Commission and the programs it administers. In addition to the appropriations, HF 645 eliminated funding for the Osteopathic Forgivable Loan Program and the Osteopathic Physician Recruitment Program and created a new Des Moines University Recruitment Program.

The proposed rule rescinds the current rule and proposes in its place the rules which will be used to administer the new Des Moines University Recruitment Program.

IOWA COLLEGE STUDENT AID COMMISSION[283]

Notice of Intended Action

Pursuant to the authority of Iowa Code Chapter 261.3, the Iowa College Student Aid Commission hereby gives Notice of Intended Action to amend Chapter 14, “Iowa Osteopathic Physician Recruitment Program”, Iowa Administrative Code.

The rules in Chapter 14 describe the administration of the Iowa Osteopathic Physician Recruitment Program. These amendments rescind the current rules and propose, in their place, rules to implement the new Health Care Professional Recruitment Program enacted by the Iowa General Assembly in House File 645 which replaces the current program.

Interested persons may submit comments orally or in writing by 4:30 p.m. on January 15, 2012, to the Executive Director, Iowa College Student Aid Commission, 603 East 12th Street 5th Floor, Des Moines, Iowa 50319-9017; fax (515) 725-3401.

The Commission does not intend to grant waivers under the provisions of these rules.

After analysis and review of this rulemaking, the Commission estimates that approximately seven additional health care professionals will be hired in rural Iowa communities.

This amendment is intended to implement Iowa Code chapter 261.

The following amendment is proposed.

Rescind rule 283—14 and insert in its place the following:

**CHAPTER 14
HEALTH CARE PROFESSIONAL_RECRUITMENT PROGRAM**

[Prior to 8/10/88, see College Aid Commission, 245—Ch 7]

PREAMBLE

The health care professional recruitment program is established to be administered by the college student aid commission for Des Moines University. The program shall consist of a loan repayment program for health care professionals who are graduates of Des Moines University. The college student aid commission shall regularly adjust the health care professional service requirement under each aspect of the program to provide, to the extent possible, an equal financial benefit.

283—14.1(261)

Definitions.

"Eligible rural community" means a medically underserved rural Iowa community which agrees to match state funds on at least a dollar-for-dollar basis for the loan repayment of a health care professional who practices in the community.

"Health care professional" means an individual who holds a practitioner's license issued by an agency or board under the Iowa Department of Public Health who is employed as a physician, physician assistant, podiatrist, or physical therapist.

283—14.2(261) Health care professional loan repayment program.

14.2(1) Recruitment.

The university shall recruit and place health care professionals in eligible rural communities that agree to provide matching funds for the health care professional loan repayment program.

14.2(2) Health care professional service requirement.

The health care professional service requirement for the health care professional loan repayment program is four years. The health care professional must annually verify, in a format acceptable

to the commission, that the health care professional practiced in an eligible rural community for 12 consecutive months for each year of required service. An award will be prorated based on the months of service provided in a state fiscal year if less than 12 months.

14.2(3) Award.

The health care professional may receive up to \$50,000 in state-funded repayment benefits when a community agrees to fund matching benefits of an equal or greater amount.

14.2(4) Eligible loans.

Eligible loans include subsidized and unsubsidized Stafford loans, Grad PLUS loans and consolidated loans. Only the outstanding portion of a Federal Consolidation Loan that was used to repay an eligible subsidized or unsubsidized Federal Stafford Loan, an eligible Direct Subsidized Loan, an eligible Direct Unsubsidized Loan, or an eligible Grad PLUS Loan qualifies for loan repayment.

14.2(5) Disbursement.

The commission shall disburse the loan payment to the health care professional's loan holder in return for completion of the service requirements in an eligible rural community.

14.2(6) Restrictions.

A health care professional who is in default on a Stafford loan, SLS loan, Grad PLUS loan, or a Perkins/National Direct/National Defense student loan or who owes a repayment on any Title IV grant assistance or state award shall be ineligible for repayment benefits. Eligibility for state aid may be reinstated upon payment in full of the delinquent obligation or by commission ruling on the basis of adequate extenuating evidence presented in appeal under the procedures set forth in 283—Chapter 5, Iowa Administrative Code.

14.2(7) Repayment.

- a. If loan repayment funds are applied prior to completion of the service obligation, and the health care professional fails to complete the required service obligation, repayment shall begin 30 days following termination of practice in an eligible rural community.
- b. The commission shall prorate the award balance based on the months of service provided.
- c. The health care professional shall repay the prorated balance of the loan repayment benefits and accrued interest at 12 percent per annum. Interest shall accrue on the unpaid principal balance of each loan from the effective date of the loan repayment agreement until the loan is paid in full.
- d. The prorated balance of the health care professional must be paid in full within three years from the date the service ends.

283—14.3(261) Osteopathic forgivable loan.

14.3(1) *Physician service requirement.*

The physician service requirement for the osteopathic forgivable loan program is one year for borrowers who received up to two annual loans and two years for borrowers who received three or more annual loans.

14.3(2) *Promissory note.*

Loans disbursed are subject to the terms and conditions specified in the promissory note. The college student aid commission will honor master promissory notes signed while attending the university, and enforce the loans according to the terms and conditions provided in the master promissory note.

These rules are intended to implement Iowa Code section 261.19.

IOWA COLLEGE STUDENT AID COMMISSION

**External Collections Management
Contract Extension
November 2011**

RECOMMENDED ACTION:

Authorize staff to exercise option to extend the External Collections Management contract with Diversified Collection Services, Inc. (DCS).

The Commission issued a Request for Proposals (RFP) in October 2007 for external collections management services for the Commission’s defaulted federal student loans. The contract was awarded to DCS in December 2007. DCS received a two-year contract (January 1, 2008 – December 31, 2009) which permits three one-year renewals at the option of the Commission. In each of the last two years, the Commission voted to extend this contract for one year.

Staff has been very pleased with DCS’s performance under this contract. Under this contract type, DCS has provided Commission staff with significant time savings in the areas of invoicing, vendor management, and management reporting. DCS’s collections performance has been stellar. In the most recently released U.S. Department of Education recovery rate rankings, the Commission ranked 4th among all guarantors. Below is a summary of recent collection performance:

| Recovery Rates Provided by the U.S. Department of Education Recovery Totals FYE Results | | | | | | | |
|--|---------------------|----------------------|---------------------------|---------------------------|----------------------|---------------------------|---------------------------|
| Year | Beginning Inventory | Combined Collections | Combined Recovery Percent | Combined Recovery Ranking | Non-Cons Collections | Non-Cons Recovery Percent | Non-Cons Recovery Ranking |
| FFY06 | \$113,969,769 | \$28,816,079 | 25.28% | 24 | \$16,067,414 | 14.10% | 26 |
| FFY07 | \$119,712,501 | \$36,723,091 | 30.68% | 17 | \$24,519,821 | 20.48% | 22 |
| FFY08 | \$125,543,786 | \$41,810,581 | 33.30% | 13 | \$27,636,833 | 22.01% | 22 |
| FFY09 | \$163,187,896 | \$57,374,434 | 35.16% | 5 | \$29,015,012 | 17.78% | 20 |
| FFY10 | \$174,306,292 | \$69,952,653 | 40.13% | 4 | \$50,193,062 | 28.80% | 4 |
| FFY11 thru July | \$169,836,570 | \$57,524,121 | 33.87% | 4 | \$36,980,481 | 21.77% | 5 |

In order to keep this high level of collections, staff recommends exercising the option for a one-year renewal with DCS.

IOWA COLLEGE STUDENT AID COMMISSION

Ashford University Application for Voluntary Postsecondary Registration in Iowa November 2011

RECOMMENDED ACTION:

Approve Ashford University's voluntary application for postsecondary registration in Iowa.

During its registration term, Ashford University must comply with all of the following:

- Authorize Dan Richins, Divisional Vice President, Financial Aid (or an alternate contact suitable to the Commission) to 1) directly provide Commission staff upon request with information and records maintained by Ashford University and its servicer in response to Ashford University student inquiries the Commission receives about financial aid matters and 2) take action to resolve bona fide student complaints and/or federal and state financial aid compliance issues.
- Respond to Commission staff regarding all student complaints the Commission receives and communicates to the University within 10 business days or, within that time frame, provide a substantive cause for a request for additional time and a specific time frame in which staff will receive a response.
- Pursuant to Iowa Code Section 261B.5, notify Commission staff every 90 days of the Iowa location(s) at which an online degree candidate will fulfill a clinical, internship, externship or practicum requirement at an Iowa location.
- Continue to respond to Commission staff's requests for review of Ashford University policies and procedures for the administration of state and federal student aid.

Registration Purpose

Ashford University is currently eligible for an exemption from registration in Iowa under Iowa Code Section 261B.11, subsection 10 (i.e., Ashford University meets the institutional eligibility requirements of participation in the Iowa Grant program). Ashford University voluntarily requests registration in Iowa in order to comply with federal regulations in 34 CFR 600.9, which requires a school located in a State to be authorized through an action of that State as a condition of participation in the federal student aid programs.

Background

Ashford University is a for-profit institution that has a single physical campus located at 400 North Bluff Blvd., Clinton, Iowa. Its chief executive officer is Dr. Elizabeth Tice (at the same address). Ashford University is wholly owned by Bridgepoint Education, Inc. Ashford University is registered with the Iowa Secretary of State to conduct business in the State of Iowa. Its registered agent is

CT Corporation system, 500 E. Court Ave., Des Moines, IA 50309. Ashford University discloses that it is accredited by the Higher Learning Commission.

Programs Offered in Iowa

Ashford University seeks registration in Iowa to continue offering both residential and distance education programs in Iowa, as follows. Unless otherwise indicated, programs listed are offered both online and on the University’s campus in Clinton, IA. Total charges for tuition, books, and supplies are listed for each program. Fee charges are listed separately below the chart.

| Program to be Offered in Iowa | Tuition | Books & Supplies |
|---|----------------|-----------------------------|
| Associate of Arts in Business | \$24,960 | \$2,100 |
| Associate of Arts in Early Childhood Education | \$24,960 | \$2,100 |
| Associate of Arts in Military Studies | \$24,960 | \$2,100 |
| Associate of Arts in Organizational Management | \$24,960 | \$2,100 |
| Bachelor of Arts in Accounting | \$46,800 | \$4,000 |
| Bachelor of Arts in Adult Development | \$46,800 | \$4,000 |
| Bachelor of Arts in Applied Behavioral Science | \$46,800 | \$4,000 |
| Bachelor of Arts in Applied Linguistics | \$46,800 | \$4,000 |
| Bachelor of Arts in Business Administration | \$46,800 | \$4,000 |
| Bachelor of Arts in Business Economics | \$46,800 | \$4,000 |
| Bachelor of Arts in Business Education (Campus only) | \$62,880 | \$4,000 |
| Bachelor of Arts in Business Information Systems | \$46,800 | \$4,000 |
| Bachelor of Arts in Business Leadership | \$46,800 | \$4,000 |
| Bachelor of Arts in Child Development | \$46,800 | \$4,000 |
| Bachelor of Arts in Cognitive Studies | \$46,800 | \$4,000 |
| Bachelor of Arts in Communication Studies | \$46,800 | \$4,000 |
| Bachelor of Arts in Complementary and Alternative Health | \$46,800 | \$4,000 |
| Bachelor of Arts in Computer Graphic Design (Campus only) | \$62,880 | \$4,000 |
| Bachelor of Arts in Consumer and Family Financial Services | \$46,800 | \$4,000 |
| Bachelor of Arts in Cultural Anthropology | \$46,800 | \$4,000 |
| Bachelor of Arts in e-Marketing | \$46,800 | \$4,000 |
| Bachelor of Arts in Early Childhood Education (non-licensure) | \$46,800 | \$4,000 |
| Bachelor of Arts in Education (Campus only) (non-licensure) | \$62,880 | \$4,000 |
| Bachelor of Arts in Education and Public Policy (non-licensure) | \$46,800 | \$4,000 |
| Bachelor of Arts in Education Studies (non-licensure) | \$46,800 | \$4,000 |
| Bachelor of Arts in Elementary Education (includes pre-K) licensure program (Campus only) | \$62,880 | \$4,000 |
| Bachelor of Arts in English | \$46,800 | \$4,000 |
| Bachelor of Arts in English and Communication (Campus only) | \$62,880 | \$4,000 |
| Bachelor of Arts in English Language Learner Studies (non-licensure) | \$46,800 | \$4,000 |
| Bachelor of Arts in Entrepreneurship | \$46,800 | \$4,000 |
| Bachelor of Arts in Environmental Studies | \$46,800 | \$4,000 |
| Bachelor of Arts in Finance | \$46,800 | \$4,000 |
| Bachelor of Arts in Gerontology | \$46,800 | \$4,000 |
| Bachelor of Arts in Health and Human Services | \$46,800 | \$4,000 |
| Bachelor of Arts in Health and Wellness | \$46,800 | \$4,000 |
| Bachelor of Arts Health Care Administration | \$46,800 | \$4,000 |
| Bachelor of Arts in Health Care Studies | \$46,800 | \$4,000 |
| Bachelor of Arts in Health Education (non-licensure) | \$46,800 | \$4,000 |
| Bachelor of Arts in Health Informatics | \$46,800 | \$4,000 |

| | | |
|---|----------|---------|
| Bachelor of Arts in Health Marketing and Communications | \$46,800 | \$4,000 |
| Bachelor of Arts History | \$46,800 | \$4,000 |
| Bachelor of Arts Homeland Security and Emergency Management | \$46,800 | \$4,000 |
| Bachelor of Arts in Human Resource Management | \$46,800 | \$4,000 |
| Bachelor of Arts in Instructional Design | \$46,800 | \$4,000 |
| Bachelor of Arts in International Business | \$46,800 | \$4,000 |
| Bachelor of Arts in Journalism and Mass Communication | \$46,800 | \$4,000 |
| Bachelor of Arts in Law Enforcement Administration (non-licensure) | \$46,800 | \$4,000 |
| Bachelor of Arts in Liberal Arts | \$46,800 | \$4,000 |
| Bachelor of Arts in Library Science and Media | \$46,800 | \$4,000 |
| Bachelor of Arts in Military Studies | \$46,800 | \$4,000 |
| Bachelor of Arts in Natural Science (Campus only) | \$62,880 | \$4,000 |
| Bachelor of Arts in Operations Management and Analysis | \$46,800 | \$4,000 |
| Bachelor of Arts in Organizational Management | \$46,800 | \$4,000 |
| Bachelor of Arts in Elementary Education non-licensure (Campus only) | \$62,880 | \$4,000 |
| Bachelor of Arts in Physical Education licensure program (Campus only) | \$62,880 | \$4,000 |
| Bachelor of Arts in Professional Accounting (Campus only) | \$62,880 | \$4,000 |
| Bachelor of Arts in Project Management | \$46,800 | \$4,000 |
| Bachelor of Arts in Psychology | \$46,800 | \$4,000 |
| Bachelor of Arts in Public Administration | \$46,800 | \$4,000 |
| Bachelor of Arts in Public Relations and Marketing | \$46,800 | \$4,000 |
| Bachelor of Arts in Real Estate Studies (non-licensure) | \$46,800 | \$4,000 |
| Bachelor of Arts in Service Management with Hospitality Specialization | \$46,800 | \$4,000 |
| Bachelor of Arts in Service Management with Mass Market Retail Specialization | \$46,800 | \$4,000 |
| Bachelor of Arts in Service Management with Restaurant Specialization | \$46,800 | \$4,000 |
| Bachelor of Arts in Service Management with Non-profit Specialization | \$46,800 | \$4,000 |
| Bachelor of Arts in Social and Criminal Justice | \$46,800 | \$4,000 |
| Bachelor of Arts in Social Science | \$46,800 | \$4,000 |
| Bachelor of Arts in Social Science licensure program (Campus only) | \$62,880 | \$4,000 |
| Bachelor of Arts in Social Science with Education Concentration (non-licensure) – in teach-out | \$46,800 | \$4,000 |
| Bachelor of Arts in Sociology | \$46,800 | \$4,000 |
| Bachelor of Arts in Sports and Recreation Management | \$46,800 | \$4,000 |
| Bachelor of Arts in Supply Chain Management | \$46,800 | \$4,000 |
| Bachelor of Arts in Sustainable Enterprise Management | \$46,800 | \$4,000 |
| Bachelor of Arts in Visual Art (Campus only) | \$62,880 | \$4,000 |
| Bachelor of Science in Biology (Campus only) | \$62,880 | \$4,000 |
| Bachelor of Science in Computer Science and Mathematics (Campus only) | \$62,880 | \$4,000 |
| Bachelor of Science in Health Science Administration (Campus only) | \$62,880 | \$4,000 |
| Bachelor of Science in Natural Science (Campus only) | \$62,880 | \$4,000 |
| Master of Arts in Education with Assessment and Measurement Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with Child Development Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with Culturally Responsive Education Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with Curriculum and Instruction Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with Distance Learning Specialization (non-licensure) | \$18,360 | \$1,685 |

| | | |
|---|----------|---------|
| Master of Arts in Education with Early Childhood Education Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with Education and Public Policy Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with Education Technology Leadership Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with English Language Learners Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with Family and Community Service Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with Higher Education Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with Library and Media Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with Mathematics Instruction Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with Reading and Literacy Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with Special Education Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Education with Teacher Leader Specialization (non-licensure) | \$18,360 | \$1,685 |
| Master of Arts in Health Care Administration (non-licensure) | \$20,448 | \$1,680 |
| Master of Arts in Organizational Management with Global Management Specialization | \$20,448 | \$1,680 |
| Master of Arts in Organizational Management with Health Care Administration Specialization | \$20,448 | \$1,680 |
| Master of Arts in Organizational Management with Human Resource Management Specialization | \$20,448 | \$1,680 |
| Master of Arts in Organizational Management with Organizational Leadership Specialization | \$20,448 | \$1,680 |
| Master of Arts in Organizational Management with Project Management Specialization | \$20,448 | \$1,680 |
| Master of Arts in Organizational Management with Public Administration Specialization | \$20,448 | \$1,680 |
| Master of Arts in Organizational Management with Standard Specialization | \$20,448 | \$1,680 |
| Master of Arts in Organizational Management with Supply Chain Management Specialization | \$20,448 | \$1,680 |
| Master of Arts in Teaching and Learning with Technology (non-licensure) | \$15,300 | \$1,400 |
| Master of Business Administration with Business Economics Specialization | \$20,448 | \$1,680 |
| Master of Business Administration with Entrepreneurship Specialization | \$20,448 | \$1,680 |
| Master of Business Administration with Environmental Management Specialization | \$20,448 | \$1,680 |
| Master of Business Administration with Finance Specialization | \$20,448 | \$1,680 |
| Master of Business Administration with Global Management Specialization | \$20,448 | \$1,680 |
| Master of Business Administration with Health Care Administration | \$20,448 | \$1,680 |
| Master of Business Administration with Human Resource Management Specialization | \$20,448 | \$1,680 |
| Master of Business Administration with Information Systems Specialization | \$20,448 | \$1,680 |

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| Master of Business Administration with Marketing Specialization | \$20,448 | \$1,680 |
| Master of Business Administration with Organizational Management Specialization | \$20,448 | \$1,680 |
| Master of Business Administration with Project Management Specialization | \$20,448 | \$1,680 |
| Master of Business Administration with Public Administration Specialization | \$20,448 | \$1,680 |
| Master of Business Administration with Standard Specialization | \$20,448 | \$1,680 |
| Master of Business Administration with Supply Chain Management Specialization | \$20,448 | \$1,680 |
| Master of Public Administration | \$20,448 | \$1,680 |

*Total program costs do not include fees, which are separately addressed below because of the varying fee structures for undergraduate versus graduate students and online versus on-campus students.

Fees (in addition to program costs noted above)

Graduation Fee - \$150

Online and ASPIRE Programs

- Technology services fee (nonrefundable, one-time only, online only) - \$1290
- Prior learning assessment experiential learning essay assessment - \$140

On-Campus Traditional Programs

- Technology fee (nonrefundable) - \$200 per semester for full-time students; \$15 per credit for part-time students
- Activity fee (nonrefundable) - \$75 per semester for full-time students; \$6 per credit for less than full-time students

Practitioner (Educator) Preparation Programs

Ashford University's registration request does not include online programs that will prepare Iowa students for licensed employment *in any state* as an education professional.

Ashford University maintains an articulation agreement with Rio Salado College in Phoenix, Arizona. This agreement permitted Ashford students attending certain Ashford online baccalaureate programs to transfer to Rio Salado College, upon program completion at Ashford, for the purpose of completing an online teacher licensure program. This Rio Salado teacher licensure program included a hands-on student teaching experience in the student's home state. The combination of the Ashford baccalaureate program and the Rio Salado licensure program prepared a student for licensure candidacy in the state of Arizona. However, in response to the Commission's current policy on registering distance education providers, Rio Salado exercised its option to cease offering programs to Iowans that would have necessitated registration (i.e., programs involving a practicum (like student teaching) that would occur at an Iowa location) effective for new enrollees at Rio Salado on and after July 25, 2011.

Ashford University offers *residential* programs at its campus in Clinton, Iowa that prepare students for employment in professions that require licensure by the Iowa Board of Educational Examiners. Iowa Code Section 261B.3A, subsection 2, requires a school to obtain approval from the Iowa Board of Education for any practitioner (i.e., educator) preparation program that the school wishes to offer under its registration. The Iowa Board of Education/Board of Educational Examiners confirms that Ashford University is approved to offer teacher preparation programs that lead to the following Iowa teaching licenses or endorsements. Each license or endorsement area is followed

by the Ashford program that prepares students for that license or endorsement. Each program that focuses on a content area other than education (e.g., Bachelor of Arts in English and Communication, Bachelor of Arts in Social Science) includes an education track (also called an endorsement) for students who are preparing for employment as licensed teachers.

- K-6 Teacher Elementary Classroom (Bachelor of Arts in Elementary Education)
- Pre-K Teacher, Prekindergarten, Kindergarten Classroom (Bachelor of Arts in Elementary Education with pre-K endorsement)
- 5-12 Business – General (Bachelor of Arts in Business Education)
- K-8 English/Language Arts (Bachelor of Arts in Elementary Education with English/Language Arts endorsement)
- 5-12 English/Language Arts (Bachelor of Arts in English and Communication with Education endorsement)
- K-8 Mathematics (Bachelor of Elementary Education with Mathematics endorsement)
- 5-12 Mathematics (Bachelor of Computer Science and Math with Education endorsement)
- K-8 Physical Education (Bachelor of Arts in Physical Education)
- 5-12 Physical Education (Bachelor of Arts in Physical Education)
- K-8 Reading (Bachelor of Arts in Elementary Education with Reading endorsement)
- K-8 Science – Basic (Bachelor of Arts in Elementary Education with Basic Science endorsement)
- K-12 Biological Science (Bachelor of Arts in Natural Science with Education) endorsement or Bachelor of Science in Natural Science with Education endorsement)
- 5-12 Chemistry (Bachelor of Arts in Natural Science with Education Specialization or Bachelor of Science in Natural Science with Education endorsement)
- 5-12 General Science (Bachelor of Arts in Natural Science with Education endorsement or Bachelor of Science in Natural Science with Education endorsement)
- 5-12 American History (Bachelor of Arts in Social Science with Education endorsement)
- K-8 History (Bachelor of Arts in Elementary Education with History endorsement)
- 5-12 Psychology (Bachelor of Arts in Social Science with Education endorsement)
- K-8 Social Studies (Bachelor of Arts in Elementary Education with Social Studies endorsement)
- 5-12 Sociology (Bachelor of Arts in Social Science with Education endorsement)
- 5-12 World History (Bachelor of Arts in Social Science with Education endorsement)

Students who pursue one or more of the above endorsements are also eligible to complete an endorsement in the following if grade level requirements are met:

- 5-8 Middle School Generalist (30 credits)
- K-8 Instructional Strategist I (special education): Mild/Moderate (18 credits)
- 5-12 Instructional Strategist I (special education): Mild/Moderate (18 credits)
- K-12 Athletic Coach (7 credits)
- K-12 English as a Second Language (ESL) (18 credits)

Registration Compliance

As required by Iowa Code Section 261B.4, Ashford University disclosed its policy on refunding tuition charges for students who withdraw from its Iowa campus, and for Iowa residents who are enrolled in its online programs. The school's specific tuition refund policy is not a registration criterion; however, staff note that the University's tuition refund policy for students who attend the

University's campus in Iowa and lowans who attend its online programs complies with 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. These policies are incorporated into the University's online catalog at <http://www.ashford.edu/student/forms/Ashford%20Catalog%202011-12%20web%20Final.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. In May of 2011, Ashford University implemented a policy that complies with Iowa Code Section 261.9(1)(g). This policy is already in place and available for disclosure to Ashford University students in the University's catalog at <http://www.ashford.edu/student/forms/Ashford%20Catalog%202011-12%20web%20Final.pdf>

On its registration application, Ashford University affirms its willingness to comply with the requirements of Iowa Code Chapter 261B.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261B.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 University's enrollment agreement and online catalog.

Ashford University discloses its procedure for preserving student records in its registration application as follows:

Should Ashford University cease to exist, it will provide the University of Iowa with all student records, where they will be stored for a period of 50 years.

Ashford University provided the following information to be used by students and graduates who seek transcript information:

Registrar's Office
Ashford University
400 North Bluff Blvd.
Clinton, IA 52732

Ashford University 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 believes that, provided a school does not claim "approval" or "accreditation" by the Commission, the school serves the public's interests if it discloses that it is registered with the Commission, and provides contact information for the Commission in its student-directed materials so that Iowa residents may direct questions or express concerns about the school to Commission staff. Commission staff requests that Commissioners permit this limited disclosure under the conditions described immediately above.

Ashford University complied with the following additional requirements of administrative rules:

- Ashford University's parent company, Bridgepoint Education, Inc., publishes an annual Security and Exchange Commission 10K report, which includes an independent auditor's report for Ashford University. The audit was conducted by PricewaterhouseCoopers LLP, for the institutional fiscal year ending December 30, 2010. The auditing firm expressed its opinion that the University's financial statements present fairly, in all material respects, the school's financial position.

The same annual report discloses the University's compliance with two standards of financial responsibility that must be met by a for-profit school that participates in the federal student aid programs:

- 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." Ashford University reports that its composite score for the fiscal year ending December 31, 2010, is 3.0. The federal Department of Education's most recent composite score record is for the institutional fiscal year that ended December 31, 2009, when the University's composite score was 2.9.
 - A for-profit school is prohibited from deriving more than 90% of its revenue from Title IV aid. Ashford University reports that it derived 85% of its revenue from Title IV aid for the fiscal year ending December 31, 2010.
- Ashford University campus students have access to traditional library facilities and online research resources and services during Ashford University library hours that include 85 weekly hours during regular semesters, extended hours during finals, and special holiday, break, and summer schedules. Online resources are available 24 hours a day, 7 days a week to both campus and online students. Materials for online students can be mailed, faxed, or e-mailed by librarians. Reference librarians offer both individual and group bibliographic instruction and reference assistance online, and customized library orientation sessions for adult learners are available upon request. Research aids such as virtual vertical file listings are on the Ashford web site. A regional consortium online catalog permits students to access and borrow materials from 300+ member libraries in Illinois and portions of Iowa free of charge. Materials may be accessed either by visiting a member library or placing holds on materials for delivery by

courier three times per week. Materials may also be requested through the Interlibrary Loan service. Ashford students also have access to multiple online databases.

- As of January, 2011, Ashford University employed 447 staff and faculty in the state of Iowa. The University provided a CD containing a list of the names and job assignments for staff located in Iowa. 41 of these individuals are instructors, assistant or associate professors, or college deans at Ashford's Clinton, Iowa campus. The University also provided a CD containing curriculum vitae for an estimated 3000 Ashford University faculty in both on-campus and online programs. Staff selected on-campus faculty from the employee list, determined his/her general teaching area and cross-checked the faculty member on the vitae list. These cross-checks indicate that Ashford campus faculty have qualifications that are appropriate for their general teaching assignments. Faculty randomly sampled from the comprehensive vitae list revealed that all possess at least a master's degree. Staff accessed online employment postings for teaching positions in the online programs, which indicate that Ashford expects instructors to possess sufficient education and experience. Available online job postings for full-time faculty, whether online or on-campus, require the candidate to possess a doctoral degree.
- Ashford University discloses its process for determining that faculty within an appropriate discipline are involved in developing and evaluating curriculum for the programs to be registered in Iowa. Once a determination is made that a program is worthy of adoption, the program's structure and courses are designed with the input of appropriate Deans, Program directors, and faculty. The Dean of the appropriate academic college oversees curriculum of all programs in his/her content area. The College of External Studies, Faculty Assembly, and Academic Governance Council and the Board of Trustees participate in the review of and recommendation for implementation of both on campus and online programs. Before students are enrolled, classes are reviewed by the Dean, Program director and Curriculum Coordinators.
- Ashford University appears to have adequate physical facilities to accommodate residential students at its campus in Clinton, Iowa, based on information provided in its registration application and a virtual campus tour accessible online at <http://www.ashford.edu/tour/tourfiles/java/index.html>
- The application includes a signed statement executed by the school's chief executive officer, Dr. Elizabeth Tice. Dr. Tice states that the University is committed to delivery of programs to students in Iowa and agrees to provide alternatives for students to complete programs at other schools if the University closes a program before students have completed their course of study.

Student Complaints

Staff began recording complaints received from Ashford University students in May of 2007. From May of 2007 until July of 2011, staff received approximately 70 complaints from Ashford students, nearly all of which were enrolled in the University's online programs. The vast majority of these students voiced concerns about Ashford's procedures for managing their federal student aid funds, and the majority of the complaints about federal student aid management centered around Ashford's policy of withholding payment to the student of federal student aid funds that exceed

institutional charges (i.e., charges for tuition/fees and, if applicable, room and board) on the student's account at the time federal student aid funds are delivered to that account. Ashford University commonly refers to this as its "stipend" policy. Other student complaints received in significantly lesser numbers involved student enrollment reporting errors, inability to access financial aid funds for purchase of books, late refunds or disbursement cancellations for withdrawn students, and outstanding balances owed to Ashford University by withdrawn students. Since July of 2011, staff has received reports from students who were concerned that they were in attendance in a first or second online course but had not yet received a financial aid award letter.

Commission staff follows up with Ashford University's Divisional Vice President, Financial Aid, their Director of Student Grievance Management, or Manager, State Compliance as applicable or as available in response to student complaints. Staff determined that some student allegations concerning Ashford University were unfounded. Some allegations, while substantiated, did not suggest an across-the-board noncompliant policy or process.

Three topics of student complaints were addressed with University officials during the registration evaluation process:

1. *For online students, holding federal student aid in excess of institutional charges (commonly called a federal student aid "credit balance")* – a school is permitted by the U.S. Department of Education to hold a federal student aid credit balance, but only if the student (or parent, in the case of a PLUS loan) authorizes a school in writing to do so. A school may not coerce a student into authorizing the school to hold the student's excess federal student aid. In its authorization request, it is stated that the school must explain that a student has the right to revoke the authorization and provide information about the revocation procedures. In the absence of explicit, written authorization or in a case when the student revokes a prior authorization, the school must directly pay to the student federal student aid funds that exceed institutional charges on the student's account within, generally, 14 days of the date the credit balance is created. In late 2008, after several complaints relating to the University's alleged failure to directly pay students the amount of federal student aid funds that exceeded institutional charges posted to a student's account, Commission staff requested and received from Ashford University its student authorizations form. This form did not include an authorization to hold a credit balance of federal student aid. Commission staff determined that the U.S. Department of Education was aware of and was working with Ashford University to correct this issue. Ashford University has since implemented an appropriate credit balance authorization form. During the review of Ashford University's registration application, staff determined that the University's policy considered the credit balance authorization form a required financial aid document. In other words, the University required a student to provide either a "yes" or "no" answer on the form before the student could receive a disbursement of federal student aid for which he/she was otherwise eligible. At staff's request, Ashford University relinquished this policy and provided staff with written verification of the change in its federal student aid delivery procedures. Ashford University is also evaluating the feasibility of other staff suggestions to alleviate issues that its stipend policy presents for some students.
2. *Online students' inability to access federal student aid funds for the purchase of books* – staff believe this concern relates directly to Ashford's online program policy of holding a federal student aid credit balance with the student's authorization. An online student who has provided the University with written authorization to hold a federal student aid credit balance will not receive a direct payment of federal student aid funds until the student has completed the seventh week of a 20-week payment period. (The vast majority of students in the online

programs attend single, consecutive courses, which are 5 or 6 weeks in length.) For a Federal Pell Grant recipient, the issue is mitigated by new federal regulations effective July 1, 2011, that require a school to provide an eligible student with an amount of federal student aid funds equal to the estimated cost of books and supplies within 7 days of the beginning of a payment period. Ashford University advises non-Pell recipients that books and supplies are a personal expense. The federal Department of Education seems to support the notion that a student with a higher EFC should prepare to pay for books and supplies out of pocket: "...we believe that students who are not eligible for a Federal Pell Grant should have sufficient resources, as indicated by their higher expected family contributions, to purchase books and supplies" (Final Program Integrity Rules, *Federal Register* dated October 29, 2010, p. 66929). However, as a practical matter, students with a higher EFC do not always have cash on hand to purchase books and supplies.

At this time, Ashford University reports that the majority of underclass undergraduate students will have e-texts provided by the University through an online resource called Constellation. Charges for materials obtained through Constellation are assessed to the student's account and may, therefore, be paid with federal student aid that a student has authorized the University to hold on account. The University is working toward providing e-texts through Constellation for upper-class undergraduates and graduate students. In the interim, if a non-Pell-eligible student who has authorized the University to hold excess federal student aid on account wishes to be paid all or a portion of that aid to fund the purchase of books, the student may contact his/her financial services advisor to request a hardship stipend payment, or the student may revoke his/her credit balance hold authorization entirely.

3. *Online students begin attending courses before receiving a financial aid award letter* – staff are concerned that some Ashford University online students begin attendance in a course for which the student incurs tuition charges before the student has reliable information about the extent to which financial aid – and what financial aid resources – will pay those charges. This is not a scenario that is exclusive to Ashford University, but it occurs less frequently at a school with a traditional academic year calendar that, by its nature, provides a student with more time to apply for financial aid and have his/her eligibility determined. Ashford University has discussed with Commission staff the details of two proposed policy changes that may be of some benefit in addressing this concern:
 - The University is in the early stages of implementing a mandatory 2-week orientation course for new online undergraduate students who bring in less than 24 transfer credits. Students receive no credit for this 2-week orientation course and are not charged for the course, either at the time of the course or later if the student continues enrollment at the University. The purpose of this course is to enhance student preparedness and provide prospective students with the opportunity to make more informed decisions about whether online learning is suitable for them. The additional two week time frame also gives students who have expressed interest in Ashford University's online programs additional time to submit required financial aid application documentation.
 - Beginning on December 6, 2011, the University will implement a policy that prohibits a student who has selected financial aid as his/her primary payment option from beginning attendance in courses for which he/she will be charged until the student has submitted all documentation necessary to complete the financial aid application process (excluding any required verification documentation). Students who choose a primary payment method other than financial aid are not subject to this policy.

In an effort to ensure, to the extent possible, that the University had satisfactorily addressed substantiated issues that prompted student complaints about the University's management of financial aid, staff requested that the University submit its financial aid policies and procedures for staff review and comment during the registration application review process. The University complied with this request. Staff are advised by the University's Divisional Vice President, Financial Aid, that the document provided to staff was a compilation of the University's financial aid policies and procedures created in response to staff's request, and not a document that was currently used as an internal resource for financial aid advisors and other staff with financial aid related responsibilities. However, upon its revision to the satisfaction of staff, Ashford University will use the document in the future as a training and reference tool for financial aid staff.

To date, staff provided Ashford University's Divisional Vice President, Financial Aid, with detailed comments and suggestions for corrections to the initial policies and procedures compilation, a subsequent revision, and three independent-study training modules for new financial aid employees. The University's Divisional Vice President, Financial Aid, was available to staff by telephone and in person for a cumulative total of approximately 9 hours to review each individual staff concern. Staff continues to work with this University staff member to refine the University's financial aid training tools and anticipates Ashford's continued cooperation in that endeavor.

During its registration term, staff expects Ashford University to continue to provide information about its financial aid policies and procedures upon request to ensure that students are afforded all rights to which they are entitled as federal and state student aid recipients.

As requested on the registration application, the University discloses its informal and formal process for addressing internal complaints from students. The University expects students to make a reasonable effort to resolve issues with faculty, staff, or administrators using available appeal procedures for grades, transfer credits and satisfactory academic progress. If satisfactory resolution is not reached at this initial level, the student should contact the individual's direct supervisor. If these efforts are unsuccessful or impracticable, a student may initiate the formal complaint/grievance process. A formal complaint must be submitted to Ashford's Office of Student Grievance Resolution within 30 calendar days of the incident prompting the complaint or within 30 days from the date of knowledge of the incident. Any necessary supporting materials must be provided, without exception, within 15 business days of submitting the complaint. Generally, the Vice President of Academic Affairs, University Provost, or Vice President of Student Services will have decision-making authority in regards to formal complaints. These individuals may appoint a third party or parties to investigate the complaint and provide a recommendation. These individuals may also delegate decision-making authority to a grievance committee consisting of representatives from compliance, academics, the registrar, student success, finance, student affairs, and/or enrollment. A response will be provided, in writing, within 30 business days from receipt of a formal complaint.

As indicated above, staff has historically requested information about student complaints it receives to the University's Divisional Vice President, Financial Aid, the Office of Student Grievance Resolution, or the Manager, State Compliance, as appropriate or as available. Recently, however, staff was advised that, although Divisional Vice President of Financial Aid may accept staff inquiries about student concerns or complaints, responses will be provided exclusively by the Office of Student Grievance Resolution. Commission staff finds this change in procedure less than desirable. Staff is concerned about the quality of some responses received from the Office of Student Grievance Resolution. On one occasion, the Office of Student Grievance

Resolution failed to acknowledge an error on the part of an Ashford staff person that was disclosed in verbal conversations between staff and other key Ashford officials, substantiating a student's complaint and the need for corrective action. In another case, the Office of Student Grievance Resolution failed to acknowledge that the University's enrollment reporting error for a student caused the student to owe tuition charges to the University after graduation. The Office of Student Grievance Resolution declined two staff requests to consider forgiving all or a portion of these outstanding charges and staff later learned that the University took action that reduced the student's outstanding charges only after being contacted by the federal Department of Education FSA Ombudsman's office. In addition, since August of 2011, staff considers responses from the Office of Student Grievance Resolution to be unnecessarily tardy, in excess of 30 calendar days in two cases.

Going forward, maintaining a positive working relationship with the Commission and its staff will be dependent, in part, on candid responses to student complaints and other issues that may arise, prompt action to resolve bona fide student complaints and federal or state student aid compliance issues, and acceptance of responsibility in cases when the University makes a mistake. Staff has greater confidence that the University's Divisional Vice President of Financial Aid can achieve these results. Therefore, staff expect Ashford University to authorize the official to respond directly to staff with information and/or take action to address a student's complaint or address a compliance issue relative to federal or state student aid. Staff also expect the University's officials to respond to all staff requests for information relative to student complaints or compliance issues received by staff and communicated to the University within 10 business days from the date of initial contact from Commission staff, within that time frame, provide a substantive cause for a request for additional time and a specific time frame in which staff will receive a response.

Verifications

Commission staff independently verified the following additional facts that are pertinent to the College's registration eligibility:

- Ashford University has an active Certificate of Existence #304717 registered with the Iowa Secretary of State as a domestic limited liability company.
- The federal Department of Education reports that Ashford University is currently accredited by the Higher Learning Commission (HLC), an accrediting agency that the federal Department of Education recognizes.
- The HLC reports that the University is accredited.
- The federal Department of Education reports that Ashford University was under provisional certification to participate in the federal student aid programs until June 30, 2011. Although the University's provisional certification has expired, the federal Department of Education reports that the University applied for recertification timely, and that Ashford's eligibility to participate in the federal student aid programs is continued under a month-to-month Program Participation Agreement. Per the federal Department of Education's office in Kansas City, MO the institution's federal student aid program participation is considered to be in good standing.

Ashford University was originally placed on provisional certification in 2008 for failure to meet the federal Department of Education's standards for institutional financial

responsibility. Initially, the University was required to post a letter of credit but the federal Department of Education released the University from that obligation in August of 2009 when the University again met the Department's financial responsibility standards.

Additional Information

Ashford University 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 2009): 15.3%
 - FFY 2009 national average cohort default rate: 8.8%
- Average Debt Upon Graduation: On-campus students - \$25,195; online students - \$30,764
- Graduation rate (percentage of first-time, full-time students who enrolled at the school during the 2004-2005 academic year when it was known as the Franciscan University of the Prairies and who graduated from Ashford University within 150% of the normal time for program completion): 37%

Federal Department of Education Office of the Inspector General Audit Report

The federal Department of Education's Office of the Inspector General (OIG) released a report in January of 2011 relating to an audit it conducted of Ashford University's federal student aid program administration. The report identifies six areas of noncompliance with the federal Department of Education's student aid regulations:

- Compensation plan for enrollment advisors that provided incentive payments based on securing enrollments and failure to establish that the plan and practices qualified for regulatory safe harbors
- Incorrect calculations for the amount of federal student aid that a withdrawn student earned
- Failure to timely return unearned federal student aid funds for withdrawn students
- Retention of federal student aid credit balances without proper authorization
- Improper federal student aid disbursements to ineligible students
- Failure to maintain supporting documentation for students' leaves of absence

The OIG's office recommended to federal Department of Education's Office of Federal Student Aid (FSA) that it consider sanctions in response to these findings that include action under 34 CFR Part 668, Subpart G. These federal regulatory provisions outline the federal Department of Education's ability to limit, suspend, or terminate a school's eligibility to participate in the federal student aid programs. Iowa administrative rules do not permit the Commission to approve the registration of a school that is subject to a limitation, suspension, or termination order issued by the federal Department of Education. However, the OIG's recommendations for consideration of sanctions against Ashford University are **not final**. The OIG's recommendations are subject to review and a final determination regarding any corrective action by FSA. As of this writing, FSA has not released a final, public report of corrective action in response to the OIG's findings. Staff is advised by the federal Department of Education's regional office in Kansas City that there is no information available about FSA's final decision in this matter.

The OIG's report is public record and is available on the OIG's web page at <http://www2.ed.gov/about/offices/list/oig/auditreports/fy2011/a05i0014.pdf>

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Ashford University filed sufficient evidence of financial responsibility under Iowa Code Chapter 714.18 in December of 2010. This evidence includes a continuous, corporate surety bond issued by Fidelity Insurance Company and payable to the State of Iowa in the requisite amount of \$50,000.

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. Ashford University adopted a policy that complies with Iowa Code Section 714.23 in January 2011 for its Iowa resident online students and for students that attend its Iowa campus. The University modified that policy during the registration application review process in light of a change in its procedure for determining the date of a student's withdrawal in its online programs and staff considers the modification compliant.

IOWA COLLEGE STUDENT AID COMMISSION

South University Application for Voluntary Postsecondary Registration in Iowa November 2011

RECOMMENDED ACTION:

Approve South University's application for postsecondary registration in Iowa.

Pursuant to Iowa Code Section 261B.5, South University must notify Commission staff within 90 days of the date that it places an Iowan at an Iowa location(s) at which an online degree candidate will fulfill an internship/externship/clinical requirement.

Registration Purpose

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..." Commission staff implemented a policy of requiring an out-of-state school that offers a course of instruction via distance delivery to register in Iowa if some aspect of the school's distance education programs or its operations relative to distance education programs occurs at a location in Iowa. This could occur when a school's distance education program requires a student to complete, for example, a clinical, practicum, or externship that the student is permitted to participate in at a location in Iowa, or when the school conducts recruiting activities for its distance education programs at a physical location in Iowa or employs instructors in its distance education programs that work for the school remotely from a physical location in Iowa.

South University seeks to offer associate, baccalaureate, masters, and doctoral level degree programs as well as a post-graduate certificate program in Iowa via distance education. Under the Commission's current policy for distance education providers, staff required the University to register for the following reasons:

- The Master's of Science in Nursing and the Accelerated RN to MSN nursing programs that the University proposes to offer in Iowa require a student to participate in a clinical experience that, for an Iowan, will occur at a location in Iowa.
- The University employs two full-time Iowa-resident instructors in its distance education programs who work for the school from their homes or other location in Iowa.

Background

South University is a for-profit institution whose main campus is located at 709 Mall Boulevard, Savannah, GA. The University maintains additional campuses in South Carolina, Alabama, Virginia, and Florida. Its chief executive officer is John T. South, III (at the same address as for the College's principal office). The University's registration application states that it is wholly owned by South University, LCC. South University's parent company is Education Management Corporation (EDMC). South University has applied for registration with the Iowa

Secretary of State as an entity transacting business in Iowa. Its registered agent is Corporation Service Company, Suite 729, 505 5th Ave., Des Moines IA 50309.

South University discloses that it is accredited by the Commission on Colleges of the Southern Association of Colleges and Schools.

Programs Offered in Iowa

South University seeks registration in Iowa in order to offer the following distance education programs. Total estimated costs for tuition and books are listed for each program. Fees and supplies are separately assessed and are not included in the amounts below.

Doctoral Degree Programs

Doctor of Business Administration - \$49,775

Post Graduate Certificate Program

Certificate in Nursing - \$13,455

Master Degree Programs

Master of Science in Leadership - \$25,039

Master of Business Administration - \$25,039

Master of Public Administration - \$25,039

Master of Science in Criminal Justice - \$23,743

MBA in Healthcare Administration - \$25,039

Master of Science in Information Systems and Technology - \$25,039

Master of Science in Nursing - \$18,655

Accelerated RN to MSN (Master of Science in Nursing) - \$80,050 (this is a dual degree program that permits a licensed RN with an associate degree to achieve both a baccalaureate and a master's degree in nursing upon program completion)

Baccalaureate Degree Programs

Bachelor of Business Administration - \$67,135

Bachelor of Science in Criminal Justice - \$67,135

Bachelor of Science in Legal Studies - \$67,135

Bachelor of Science in Healthcare Management - \$68,623

Bachelor of Science in Health Science - \$67,879

Bachelor of Science in Information Technology - \$67,135

Bachelor of Science in Nursing - \$71,599

Bachelor of Arts in Psychology - \$68,623

Bachelor of Arts in Interdisciplinary Studies - \$68,623

Associate Degree Programs

Associate of Science in Business Administration - \$34,399

Associate of Science in Accounting - \$34,399

Associate of Science in Criminal Justice - \$34,399

Associate of Science in Paralegal Studies \$34,399

Associate of Science in Allied Health Science - \$33,655

Associate of Science in Information Technology - \$34,399

While distance education is the primary delivery method for the graduate level nursing programs the University offers, students are required to complete a hands-on clinical

experience in these programs. Students are responsible for locating a clinical site and site preceptor (unpaid site instructor), but the University executes a formal agreement with each clinical site. The University employs faculty with masters or doctoral level degrees to conduct onsite nursing clinical visits. These faculty must also hold an unencumbered nursing license in the state of the clinical experience. South University has a full-time Iowa resident faculty member who teaches online nursing courses and provides on-site supervision in the nursing clinicals. The University submitted documentation that this faculty member is an Iowa-licensed RN. Preceptors (voluntary onsite clinical instructors) must possess a minimum of a master's degree and be licensed in the state in which they are employed. South University uses either nurse practitioners or licensed medical doctors as preceptors.

Registration Compliance

As required by Iowa Code Section 261B.4, South University disclosed its policy on refunding tuition charges for Iowa residents who are enrolled in its online programs. The school's specific tuition refund policy is not a registration criterion, however, staff note that the University's tuition refund policy complies with 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. The University provides a drug and alcohol prevention policy that is compliant with Iowa Code to students, faculty and staff annually, and posts the policy online at <http://www.southuniversity.edu/documents/drug-alcohol-policies-south-university.pdf>
The University provides a sexual abuse/assault policy that is compliant with Iowa Code in its online Jeanne Clery Disclosure of Campus Security Policy at <http://inside.southuniversity.edu/doc/cr/SU-Savcr2009.pdf> and the online student handbook at <http://www.southuniversity.edu/documents/sav-student-handbook.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. South University has prepared a policy that is in compliance with Iowa Code and will disclose this policy in its online 2011-2012 catalog addendum scheduled for publication on the date of registration approval.

On its registration application, South University affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs,

charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. These disclosures are duplicative of the federal Department of Education's student consumer information disclosure requirements for a school that participates in the federal student aid programs and are provided in the University's enrollment agreement and online catalog.

South University discloses its procedure for preserving student records in its registration application as follows:

Academic records and financial documents are maintained during an applicant/student's active status with the school by the appropriate campus office. Paper-based records are kept in fire proof, locked storage areas with limited access. Inactive student and graduate files are held in a limited access, fireproof, locked storage area. Student and graduate records with a last day of attendance of more than five years ago are archived in a fireproof vault. Electronic safeguards are maintained for all electronic student records. South University follows the retention and record disposal recommendations of the American Association of Collegiate Registrars and Admissions Officers (AACRAO). Release of information is governed by the Family Education Rights and Privacy Act.

South University provided the following information to be used by students and graduates who seek transcript information

Amanda Jones
709 Mall Boulevard
Savannah, GA 31406
(866) 421-4643, ext. 25328

The University 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 believes that, provided a school does not claim "approval" or "accreditation" by the Commission, the school serves the public's interests if it discloses that it is registered with the Commission, and provides contact information for the Commission in its student-directed materials so that Iowa residents may direct questions or express concerns about the school to Commission staff. Commission staff requests that Commissioners permit this limited disclosure under the conditions described immediately above.

South University complied with the following additional requirements of administrative rules:

- The University submitted a report of independent auditors Ernst & Young (dated December 2010) for the institutional fiscal year ending June 30, 2010. The auditing firm expressed its opinion that the University's financial statements present fairly, in all material respects, the school's financial position.

Notes to consolidated financial statements accompanying the auditor's report disclose the University's compliance with a standard of financial responsibility that must be met by a for-profit school that participates in the federal student aid programs. 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.” South University reports that its composite score for the fiscal year ending June 30, 2010, is 1.81.

A for-profit school is prohibited from deriving more than 90% of its revenue from Title IV aid. South University reports that it derived 85.4% of its revenue from Title IV aid for the fiscal year ending June 30, 2010.

- South University Libraries provide access to more than 89,500 print book titles, 4700 AV titles, 400 print journal titles, 23 newspapers, 59 electronic databases, and over 50,000 e-books, video clips, images and full text dissertations. Additional electronic library resources include Electric Library, a comprehensive general reference database; Hoover’s Online, which provides information about companies, industries, people and products; ProQuest online, a resource for periodicals and newspapers; Thomas Register, which provides information about American and Canadian products and services; and Wilson Web which provides access to magazines and journals in fine arts, liberal arts and sciences. South University also has cooperative agreements with other entities that provide resources, some of which permit online access. Librarians have access to Resources for Colleges Libraries through RCL Web which provides 65,000 titles in 58 curricula and Doody’s DLS Online service that provides current reviews and core lists in health related subject areas. Online students follow the link to the library from their academic class. Online reference assistance is available to remote students via e-mail and telephone. Other services offered to students include psycho-social, short-term counseling and counseling referral services, academic advisement, career advisement and placement, and services for persons with disabilities.
- South University employs two full-time, Iowa-resident faculty in its online programs, as follows:
 - Tauqir Bibi, Ames, IA. -general education instructor, tbibi@southuniveristy.edu
 - Cheryl Wagner, Davenport, IA. -nursing instructor/onsite clinical supervisor, cwagner@southuniveristy.edu

Resumes submitted for the faculty indicate that they are sufficiently qualified for their assignments. Both have doctoral degrees from an Iowa Regent university. Ms. Wagner’s doctorate is in nursing administration. Both have online teaching experience at a postsecondary educational institution.

Additional information about adjunct online faculty qualifications are available on the South University web site at:

http://online.southuniversity.edu/docs/SUO_Faculty_HR_Packet.pdf The University requires adjunct online faculty to possess, at minimum, a masters degree, a minimum of 18 graduate credit hours in the area in the applicant wishes to teach from a regionally accredited institution, and at least six months teaching experience. The University states that many of the University’s courses require faculty to possess a doctoral degree.

- South University discloses its process for determining that faculty within an appropriate discipline are involved in developing and evaluating curriculum for the programs to be registered in Iowa. Information from all sources is compiled by the appropriate administrator and distributed to the academic department's vice president/dean of academic affairs. Additionally operations department chairs/program directors regularly assess the data and findings relating to the success or current course content and teaching practices. Revisions of both core and major curriculum requirements are developed based on these findings. This includes the overall scope and sequencing of courses. Proposals for revisions are presented to the School Curriculum Committees, which make recommendations to the Council of Presidents. The Council seeks final approval from the board of trustees, thus ensuring the changes are consistent with the purpose of the University.
- The application includes a signed statement executed by the school's chief executive officer stating the University's commitment to the delivery of programs to students in Iowa in their entirety. If for some reason South University must discontinue a program or cease operations within Iowa, the University will provide Iowa residents who are currently enrolled in programs that would be negatively affected alternatives to complete the discontinued program.

Verifications

Commission staff independently verified the following additional facts that are pertinent to the College's registration eligibility:

- The federal Department of Education reports that South University is accredited by the Southern Association of Colleges and Schools, Commission on Colleges, and that its Masters of Science in Nursing program is accredited by the Commission on Collegiate Nursing Education. Both entities are recognized by the federal Department of Education.
- The Southern Association of Colleges and Schools, Commission on Colleges, reports that the University is accredited. The Commission on Collegiate Nursing Education reports that it has accredited the University's master's level nursing program(s).
- The federal Department of Education reports that South University is under provisional approval to participate in the federal student aid programs effective October, 20, 2010, until June 30, 2013. The University was placed on provisional approval because of its prior failure to meet institutional financial responsibility standards. South University was required to submit an initial letter of credit in the amount of \$18,926.742. The federal Department of Education requires the University to renew the letter of credit annually. The institution is also currently subject to the cash monitoring payment method, in which the federal Department of Education requires the school to first make disbursements of federal student aid to students and parents before it submits a request for the funds from the Department.
- The Iowa Board of Nursing does not require South University to seek its approval for the University's online baccalaureate or masters level program(s) in nursing. The full-time Iowa-resident employee, Cheryl Wagner, who provides online instruction in the nursing

programs and who provides on-site supervision in nursing clinicals that take place in Iowa is an Iowa-licensed RN.

Additional Information

South University 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 2009): 13.5%
 - FFY 2009 national average cohort default rate: 8.8%
- Average Debt Upon Graduation

The University disclosed on its application the average debt upon graduation only for loan borrowers in the Master of Science in Nursing Program. Staff accessed the median debt upon graduation for borrowers in other programs the University proposes to offer in Iowa from its gainful employment disclosures web site, as follows. Data is not available for some programs listed below. The University reports that guidance published by the federal Department of Education prohibits schools from releasing data on programs with less than 10 graduates <http://ifap.ed.gov/GainfulEmploymentInfo/2011GEFAQ.html>

Business Administration Doctorate - unavailable
Leadership Masters - \$28,200
Business Administration Masters - \$28,220
Public Administration Masters - unavailable
Criminal Justice Masters - \$29,928
MBA in Health Care - \$32,160
Information Systems and Technology Masters - \$20,722
Nursing Masters – \$19,200
Accelerated RN to MSN – unavailable
Business Administration Baccalaureate - \$33,102
Criminal Justice Baccalaureate - \$36,737
Healthcare Management Baccalaureate - \$36,308
Legal Studies Baccalaureate - \$29,883
Information Technology Baccalaureate - \$26,885
Nursing Baccalaureate – \$27,611
Psychology Baccalaureate - unavailable
Business Administration Associate - \$22,699
Paralegal Studies Associate - \$24,215
Information Technology Associate - \$26,849
Accounting Associate - \$19,020
Criminal Justice Associate – unavailable
Allied Health Science Associate - \$23,300

Median loan debt and other gainful employment disclosures for the University's programs may be accessed on line at <http://www.southuniversity.edu/programs-info/default.aspx>

- Graduation rate (percentage of first-time, full-time students who enrolled at the school and who graduated within 150% of the normal time for program completion): 15%

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

During the registration application review process, South University filed sufficient evidence of financial responsibility under Iowa Code Chapter 714.18. This evidence includes a continuous, corporate surety bond issued by Platte River Insurance Company and payable to the State of Iowa in the requisite amount of \$50,000.

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. South University drafted a policy during the application review process that complies with Iowa Code section 714.23 for its Iowa resident online students. The policy will be disclosed to students in a catalog addendum that the University will publish on the date of registration approval.

IOWA COLLEGE STUDENT AID COMMISSION

Western Governors University Application for Postsecondary Registration in Iowa November 2011

RECOMMENDED ACTION:

Approve the application for postsecondary registration in Iowa for Western Governors University (WGU) with a waiver of the full-time, Iowa-resident faculty member or program coordinator requirement of administrative rule.

As a condition of registration, per Iowa Code Section 261B.5, WGU must report every 90 days the Iowa location(s) at which an online degree candidate will participate in a required field experience.

Special Note Concerning Practitioner Preparation Programs

WGU has applied for registration in Iowa, in part, to continue offering practitioner (educator) preparation programs for teachers and school administrators at the baccalaureate, post-baccalaureate, and graduate level. Iowa Code Section 261B.3A, subsection 2, requires a school that wishes to offer a practitioner preparation program in Iowa to obtain the approval of the Iowa Board of Education before the Commission may permit the school to offer a practitioner preparation program(s) under its registration. WGU has applied for Iowa Board of Education approval of its online practitioner preparation programs. The school has received a positive recommendation for approval from the Iowa Department of Education, and is scheduled for approval consideration during the Iowa Board of Education's meeting on Thursday, November 17, 2011. WGU's consideration by the Iowa Board of Education will occur the day prior to the Commission meeting when WGU's registration will be considered. Therefore, staff will announce the results of the Iowa Board of Education's decision during consideration of WGU's registration request at the Commission's November 18th meeting.

If WGU receives the Iowa Board of Education's approval to offer its online practitioner preparation programs in Iowa, staff will so advise the Commission during its November 18th meeting and staff's registration approval recommendation will include those programs. The Iowa Board of Education's approval of WGU's online practitioner preparation programs will not result in a student's qualification for initial licensure in Iowa. Under this approval, students must first obtain a license in the state in which WGU maintains its primary administrative offices (Utah) and then the student may apply to the Iowa Board of Educational Examiners for an Iowa license through a process that is commonly referred to as reciprocity.

If WGU does not receive the Iowa Board of Education's approval to offer its online practitioner preparation programs in Iowa, staff will advise the Commission during its November 18th meeting. In that case, staff's registration approval recommendation will 1) include all of the programs that WGU desires to offer in Iowa with the exception of its practitioner preparation programs (see the italicized subtitle "Non-Practitioner Preparation Programs Offered in Iowa")

below), and 2) stipulate that WGU must cease offering its practitioner preparation programs to new Iowa enrollees on and after the date of registration.

Registration Purpose

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...” Commission staff implemented a policy of requiring an out-of-state school that offers a course of instruction via distance delivery to register in Iowa if some aspect of the school’s distance education programs or its operations relative to distance education programs occurs at a location in Iowa. This could occur, for example, when a school’s distance education program requires a student to complete, a clinical, practicum, or internship/externship that the student participates in at a location in Iowa, or when the school conducts recruiting activities for its distance education programs at a physical location in Iowa or employs instructors in its distance education programs that work for the school remotely from a physical location in Iowa.

WGU requests registration in order to continue offering baccalaureate degree, post-baccalaureate certificate, and graduate degree programs in Iowa via distance education. Under the Commission’s current policy regarding distance education providers, staff required the University to register for the following reasons:

- Select distance education programs that WGU wishes to continue offering in Iowa require a field experience that the student will fulfill at a location in Iowa.
- WGU compensates consultants who work as on-site supervisors in field experiences that will occur in Iowa.
- WGU wishes to employ Iowa-resident faculty to work remotely for the school in its online programs.

Background

WGU is a private, non-profit institution that provides instruction exclusively via distance education and has no traditional campus. Its primary administrative office is located at 4001 South 700 East, Suite 700, Salt Lake City, UT 84107. The University’s chief executive officer is Robert W. Mendenhall, Ph.D. (same address). WGU is registered with the Iowa Secretary of State’s office as a foreign non-profit corporation. Its registered agent is National Registered Agents, Inc., 604 Locust St. Suite 222, Des Moines, IA 50309. WGU discloses that the institution and, as applicable, its programs are accredited by four entities that are recognized by the federal Department of Education: the Northwest Commission on Colleges and Universities; the Distance Education and Training Council; the National Council for Accreditation of Teacher Education; and the Commission on Collegiate Nursing Education.

WGU’s instructional delivery methodology is different than many of the colleges and universities that offer online education. Students at WGU do not attend scheduled online classes nor do they have professors in the traditional sense. Students do not earn credit hours but rather competency units, each of which is the equivalent to one semester hour of learning at a traditional university. WGU states this equivalency is accepted by the federal Department of Education, WGU’s regional, national, and programmatic accrediting agencies and other colleges and universities for the purpose of credit transfers. Tuition is charged at a flat rate every six

months; thus, the student pays for time in the program and not for credit hours. Each degree program is developed by a council of experts in the field who define competencies, i.e., knowledge, proficiencies, and skills that a student needs to possess in order to earn a degree. These competencies form the curriculum and a student must earn a set number of competency units in order to earn a degree. A student earns competency units and fulfills the requirements of a degree plan by demonstrating skills and knowledge in required subject areas through a series of assessments (e.g., tests, performance tasks, scored observation, portfolios). Students are presented with detailed courses of study (comparable to traditional syllabi) that contain the learning steps and activities that are necessary for students to build the required competencies in a subject area and work toward successful completion of the assessments. A course of study contains readings, tutorials, lessons, and tasks/activities that a student completes at his/her own pace. WGU provided to staff a sample course of study entitled "LAE1 – Language and Communication: Essay Writing" and, with WGU's permission, this sample course of study is attached to this recommendation.

Each student is assigned a Student Mentor (a WGU employee - not a fellow student) who works with the student via phone, e-mail, and web conferencing throughout the duration of the program. This mentor works with the student to develop a degree plan, helps the student stay on track with his/her plan, coaches the student, and provides practical advice. Students are also assigned a Course Mentor who is a subject matter expert. The type and intensity of instructional support provided by a course mentor varies with each student based on the student's needs in a particular course and may range from help with specific questions to more fully engaged tutorial support. Program faculty at WGU are not instructors but are academic experts with primary responsibility for defining essential competencies for each subject area. They work alongside Student Mentors and Course Mentors to facilitate student learning and success. WGU also employs adjunct faculty as competency evaluators. These employees judge demonstrations of student competence against established proficiency standards on performance assessments.

Students with prior experience in a subject matter area may progress more quickly through a course of study to the assessment, but WGU's courses of study are not designed to permit a student to "test out" of a course without guided independent study. Successful WGU students spend at least 20 hours per week on their studies.

Programs Offered In Iowa

WGU applied for registration to continue offering Iowans the distance education programs listed below. Online periods of enrollment are structured in six-month terms. Tuition costs per six-month term in each program are listed below. Tuition covers all work a student completes during the term, no matter how many competency units the student earns during a term. WGU does not charge by the credit hour or competency unit. WGU cannot predict average total program costs since WGU students progress at their own pace through a program based on their prior education and experience and how much time and effort they are able to devote to their studies. WGU cannot estimate average costs of texts and other learning resources, since these vary from program to program and from student to student. The student determines which learning resources to use in consultation with his or her mentor. The majority of learning resources are included in tuition charges with the exception of textbooks, the majority of which are e-texts for which students are not charged. Set fees that apply to all students are listed below.

Non-Practitioner Preparation Programs Offered in Iowa

- Bachelor of Science in Accounting - \$2890/term
- Bachelor of Science in Business – HR Management - \$2890/term
- Bachelor of Science in Business – IT Management - \$2890/term
- Bachelor of Science in Business Management - \$2890/term
- Bachelor of Science in Business – Marketing Management - \$2890/term
- Bachelor of Science in Health Informatics - \$2890/term
- Bachelor of Science in Information Technology - \$2890/term
- Bachelor of Science in IT Networks Design and Management - \$2890/term
- Bachelor of Science in IT Networks Administration - \$2890/term
- Bachelor of Science in IT Databases - \$2890/term
- Bachelor of Science in IT Security - \$2890/term
- Bachelor of Science in IT Software - \$2890/term
- Bachelor of Science in Nursing (RN to BSN) - \$3250/term
- Bachelor of Science in Sales and Sales Management - \$2890/term
- Master's of Science in Nursing Education (37 CUs) \$3250/term
- Masters of Science in Information Security and Assurance - \$2890/term
- Masters of Science in Nursing (RN to MSN) (152 CUs) - \$3250/term
- Masters of Science in Nursing Leadership and Management (152 CUs) - \$3250/term
- Masters of Business Administration in Health Care Management - \$3250/term
- Masters of Business Administration - \$3250/term
- Master of Arts in Mathematics Education (non-licensure) - \$2890/term
- Master of Arts in Science Education (non-licensure) - \$2890/term
- Master of Arts in English Language Learning (non-licensure) - \$2890/term
- Master of Education in Instructional Design (non-licensure) - \$2890/term
- Master of Education in Learning Technology (non-licensure) - \$2890/term
- Master of Science in Curriculum and Instruction (non-licensure) - \$2890/term

Note: WGU offers an online baccalaureate degree program that prepares a student to become a licensed nurse but the University is *not offering this program in Iowa at this time and has not requested authority under its registration to begin offering this program to Iowans.*

Practitioner Preparation Programs Offered in Iowa (subject to Iowa Board of Education approval)

The average cost per 6-month term for all programs listed below is \$2890.

- Bachelor of Arts in Interdisciplinary Studies for Prospective K-8 Teachers
- Bachelor of Arts in Early Childhood Education for Prospective Teachers
- Bachelor of Arts in Mathematics for Prospective Teachers
- Bachelor of Arts in Science for Prospective Teachers
- Bachelor of Arts in Special Education
- Post-Baccalaureate Teacher Preparation in Elementary Education
- Post-Baccalaureate Teacher Preparation in Mathematics
- Post-Baccalaureate Teacher Preparation in Science
- Post-Baccalaureate Teacher Preparation in Social Science
- Post-Baccalaureate Endorsement Preparation in English Language Learning
- Post-Baccalaureate Endorsement in Educational Leadership (principal)
- Master of Arts in Teaching/Elementary
- Master of Arts in Teaching/Mathematics

- Master of Arts in Teaching/Science
- Master of Arts in Teaching/Social Science
- Master of Arts in Teaching/Special Education
- Master of Science in Education Leadership (principal)

Fees

- Application fee: \$65 (nonrefundable)
- Resource fee: \$145 per term
This fee covers the use of the library, e-textbooks and other learning resources
- Science Lab Fee: \$350 (one time)
Individuals pursuing either of the science bachelor's degrees or science master's degrees that require a home science lab will be assessed this one-time charge (billed separately along with the first term's tuition).
- Consolidated Nursing Program Fee: \$350 (one-time assessment)
Individuals pursuing a nursing degree will be assessed a one-time charge (billed separately along with the first term's tuition).
- Demonstration Teaching: \$1000
Individuals in a Teachers College program that includes student teaching must pay a \$100 application fee, plus a \$900 demonstration teaching fee prior to their in-classroom teaching practicum.
- Internship Teaching Model: \$1,900 (one time)
Individuals in a Teachers College program that includes student teaching will be assessed a one-time charge for the Demonstration Teaching fee, either the standard fee or the Internship Model fee. The Internship Model fee applies only to those individuals who will student teach under the internship model for an entire school year.
- Educational Leadership Practicum: \$1,000 (one time)
Individuals pursuing the M.S. in Educational Leadership will be assessed this one-time fee in their last term as they complete this practicum experience

Field Experience

Many of the practitioner preparation programs and the Bachelor of Science in Health Informatics program require a field experience (i.e., practicum).

- For the Bachelor of Science in Health Informatics, students recommend potential placements at healthcare facilities, insurance companies or physicians' offices to WGU, subject to WGU approval. A contract is executed between WGU and the placement site. Supervision and evaluation in the field experience are provided by a mentor who is an employee of the site and who is not compensated by WGU. There are two 80-hour practica required for this program.
- WGU provided a detailed handbook for field experiences associated with its teacher preparation programs that sets expectations for students, volunteer field experience instructors (called the "host teacher"), and supervisors (called the "clinical supervisor") during a 12-week student teaching experience. The host teacher provides day-to-day supervision for the student; the clinical supervisor observes the student's performance on site six times during the practicum. Host teachers must hold a teaching credential or be licensed in the subject area taught, have at least 3 years teaching experience and prior experience mentoring teacher candidates. Clinical supervisors, at minimum, have a

baccalaureate degree in education, at least four years experience in teaching or school administration, and provide evidence of a background clearance. If the student is a candidate for secondary school teaching, the supervisor must currently hold, or must have previously held, a license to teach in the content area that is under supervision.

- For the school principal preparation programs, staff accessed a sample agreement between the University and a school district for practicum placement of a student enrolled in its educational leadership (school principal preparation) program. This agreement outlines responsibilities of the school district, its administrator(s), and the student relating to 450 hours of administrative tasks the student must perform under the leadership of an administrator assigned to the student by the school district.

WGU maintains a field experiences office that coordinates on-site experiential learning opportunities for students.

There are no clinical experiences associated with the baccalaureate and graduate level nursing programs that WGU offers in Iowa. (Please note that WGU's nursing programs offerings in Iowa are not intended to train persons who seek licensure as a nurse.) However, despite the absence of a hands-on clinical experience, staff recommend that WGU's registration include these programs without further stipulation since the Commission on Collegiate Nursing Education, an entity recognized by the federal Department of Education, has accredited WGU's online baccalaureate and graduate level nursing programs.

Registration Compliance

As required by Iowa Code Section 261B.4, WGU disclosed its policy on refunding tuition charges for withdrawn students. The policy is disclosed on the University's web site at http://www.wgu.edu/tuition_financial_aid/tuition The school's specific tuition refund policy is not a criterion for registration.

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. WGU provides these disclosures in its Code of Student Conduct and Teachers College Code of Ethics (violations for drug/alcohol abuse and sexual assault), and in its Student Handbook (substance abuse prevention resources). All of these resources are available on the WGU web site.
- 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. WGU's military withdrawal policy assesses tuition charges for competencies completed during the six-month term in which the student withdraws. It provides a refund of tuition charges paid for the six-month period of time proportionate to the ratio of competencies completed to competencies that would constitute full-time load at a traditional university (12 competency units). For example, if the withdrawn student completed 3 competencies during the six-month term in which he/she withdrew, the student would be refunded 75% of tuition paid. Keeping in mind that WGU students are not assessed tuition charges based on the number of credits in which the student enrolls, staff considers this policy compliant with the expectation of Iowa law that a student be afforded, at minimum, the option to receive a full refund of tuition for courses not completed. During the application review process, WGU updated its military withdrawal policy to include the spouse of a deployed service member who has a dependent child, and to address a refund of mandatory fees associated with competencies that the student has not completed. The University will implement this policy upon registration and disclose the policy to students in its student handbook.

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

WGU discloses in its application its procedures for preserving student records. WGU preserves student records digitally in its primary data center facility in Phoenix, AZ. WGU also uses a secondary data center in Salt Lake City, UT to store data with redundancy at this remote site. All aspects of student records are preserved including, but not limited to, Banner records (including student academic, financial aid and accounts), CRM records, and enrollment records. At the present, all student-related data and records are stored in perpetuity.

The following information is to be used by students and graduates who seek transcript information:

- Online transcript requests should be directed to the National Student Clearinghouse at http://www.studentclearinghouse.org/secure_area/Transcript/to_bridge.asp
Online delivery options range from same day express service to mail within 5 business days.
- By mail, a student should send a handwritten or typed request to the Student Records Office:
Western Governors University
ATTN: Records Department
4001 South 700 East, Suite 700
Salt Lake City, UT 84107
- Questions regarding transcripts should be directed to records@wgu.edu.

WGU affirms 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 believes 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. Staff requests that the Commission permit this limited disclosure under these conditions.

WGU complied with the following additional administrative rule requirements for a registration applicant:

- The University submitted the report of an independent auditing firm, Mayer Hoffman McCann, P.C., dated December 10, 2010, for the institutional fiscal years ending June 30, 2009, and June 30, 2010. The auditing firm expressed its opinion that the University'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 financially responsible without additional oversight. Staff did not find that the independent auditing firm reported or tested the University's composite score. The most recent composite score available from the federal Department of Education for the University is for institutional fiscal years that ended on June 30, 2010; the University's composite score was 2.6.

- The University discloses in its application how it provides students with access to learning resources. All instructional content and resources are delivered using a variety of distance education modalities. Electronic instructional tools connect students to personalized academic action plans, third party and independent learning resources, and Web-based learning communities. In addition to the library services described below, WGU learning resources include online tutorials, simulations, laboratories, streaming, and videos. A new feature, referred to as "vendor integration" allows single sign-on to all recommended resources for a course of study. These online learning resources are the means by which WGU provides anytime, anywhere access to post-secondary educational opportunities. WGU's Education Provider (EP) agreements with entities with whom WGU contracts for learning resources require that WGU students receive the same course access and services that the EP affords its own students.

WGU's Library maintains multiple major academic databases. Students have an array of options when searching for journal articles, including searching through a federated search engine by journal title using an A-Z Journal linker by program and college or by subject. E-library, a subscription E-book provider, gives students access to 50,000+ full text E-books. Students may also access Book 24/7, with an additional 12,000+ full text E-books. WGU provides Interlibrary Loan services through a contractual relationship with the University of Michigan, whose library is one of the largest university library systems in the country comprising over 9.55 million volumes. The library also holds special collections that align with WGU's various degree programs. Students receive initial training in library usage during the University's introductory Education Without Boundaries course and have continuous

access to tutorials covering aspects of the library services that are specific to the functionality of the University library site. A Google site for library information and assistance is also available to WGU students, including tutorials on performing scholarly research, examining sources, and developing advanced search skills.

- It appears that the University employs individuals who have degrees, special training, experience, or other accomplishments that qualify them for their assignments based on staff review of a partial program faculty list posted on the University's web site and its current employment postings. All program faculty listed on the University's website possess a doctoral degree. Employment postings indicate that course mentors must possess, at minimum, a master's degree in the course field. In some cases, a doctorate is necessary (for example, in the case of a course mentor for secondary math education courses). WGU states that about three-quarters of its student mentors and over 95% of its course mentors have earned a graduate degree. Generally, competency evaluators must possess, at minimum, a master's degree in the competency subject matter and some employment experience in the field. Staff noted an exception for a competency evaluator in the health information management field. Although a bachelor's degree in a related field of study was permitted, WGU requires the successful candidate to be a Registered Health Information Administrator.
- The University discloses its methodology for developing and evaluating curriculum. Core faculty members, including the Provost and Associate Provosts, oversee academic programs, are involved in faculty selection and training, participate in curricular oversight, provide instructional leadership, manage online learning communities, develop assessments, and develop courses of study (comparable to traditional course syllabi), used to provide support and structure for student preparation for assessments.

Three groups – Program Council Faculty, Administrative Faculty, and Mentors – share oversight responsibility for the quality and content of the curriculum and instruction.

Program Council and Assessment Council Faculty: each WGU College has its own Program Council. Additionally, an Assessment Council oversees the approach by which the University assesses student competence. Council members are University senior faculty. The Program Council of a WGU College includes external academic and professional experts and leaders representing the disciplines within the College. These faculty members are responsible to identify and define the statements of student competence that make up the academic programs within the Colleges. Additionally, they review and approve the curricula created to achieve those outcomes and evaluate the success of the programs. The Assessment Council includes recognized experts in the technical construction and appropriate uses of assessment instruments and procedures, ensuring valid, reliable assessments designed to accurately measure competence.

Administrative Faculty: the Administrative Faculty is comprised of the Provost and Academic Vice President, five Associate Provosts, College Directors, Directors/Managers of other academic departments, and College Program and Product Managers. These faculty members serve as members of the academic leadership and management teams of WGU. As guided by the Board of Trustees, President, and Program Councils, the Academic Programs faculty create and evaluate the curriculum.

Course mentors work closely with Program and Product Managers to improve learning resources, and supervise capstone projects. Additionally, they assist Product Managers with degree program development, review, and launch, and with course of study development in their areas of specialty.

- WGU provided a notarized statement from its president and CEO, Robert W. Mendenhall, affirming the University's commitment to the delivery of programs to students located in Iowa. If WGU suspends a program before students have completed their courses of study, WGU agrees to allow all current matriculates to complete programs at WGU. WGU only suspends programs with the prior approval of its regional accrediting body and provides the Commission with the assurance that all current program matriculates will be allowed to continue in and complete the program.
- *Full-Time Iowa Resident Faculty Member or Program Coordinator.* At this time, WGU does not comply with the requirement of administrative rule to employ a full-time Iowa resident faculty member or program coordinator. Consistent with the authority the Commission granted staff during its March 2011 meeting, staff recommend that the Commission waive the full-time Iowa resident faculty member requirement, given that the University seeks approval to provide postsecondary educational programs via distance education in Iowa. WGU states its desire to hire full-time Iowa-resident faculty in the future.

WGU compensates Iowa resident consultants on a temporary, part-time, and as-needed basis to provide on-site observation of WGU students who are completing student teaching experiences in education programs that lead to licensure or endorsement. WGU calls these consultants clinical supervisors. WGU provided a list of 7 Iowans who have fulfilled this role over the last 3 years. WGU requires a clinical supervisor to have at least a bachelor's degree in education and four years experience in teaching or school administration. All meet the educational requirements and all but one holds an advanced degree. While WGU does not require a clinical supervisor to be a currently licensed teacher, staff was able to confirm that 5 of the persons on this list are currently Iowa-licensed teachers and/or school administrators.

The University disclosed its process for addressing student complaints. Students who have concerns about discrimination or harassment should contact Student Services. Students with complaints about billing, financial aid, or resources should contact their Student Mentor within 10 days of the occurrence of the issue, or if the student has not yet been assigned a Student Mentor, the student may contact Student Services. If Student Services is not able to resolve the issue to the student's satisfaction, the student may appeal to the Chief Financial Officer within 5 working days of the decision. The decision of the Chief Financial Officer is final. Students with concerns about the result of an assessment should contact their Student or Course mentor who will forward the appeal to an assessment specialist. Appeals are assigned to an evaluation facilitator within 24 hours and a response provided to the Mentor by the end of the next business day. Complaints about satisfactory academic progress, term breaks, transcripts or academic history should be directed first to the student's mentor, and if unresolved to Student Services. Student Services works with the Program Manager to seek resolution. If the student wishes to appeal the decision at this level he/she must submit the complaint in writing to the Provost within 5 working days and the decision of the Provost is final. Students with unresolved issues after exhausting the University's complaint and grievances procedures are advised that they have the right to contact the University's accrediting agencies or state authorizing agencies. These disclosures are provided to students in the WGU Student Handbook.

Verifications

- The federal Department of Education reports that WGU is currently accredited by the Northwest Commission on Colleges and Universities and the Distance Education and Training Council. The University's baccalaureate and graduate level nursing programs are accredited by the Commission on College Nursing Education, an entity that the federal Department of Education recognizes for this purpose. The University's baccalaureate and graduate level teacher and school administrator preparation programs are accredited by the National Council for Accreditation of Teacher Education, also an entity that the federal Department of Education recognizes for this purpose.
- The Northwest Commission on Colleges and Universities, the Distance Education Training Council, the Commission on College Nursing Education, and the National Council for Accreditation of Teacher Education report that WGU is accredited (or its programs are accredited, as applicable).
- The federal Department of Education reports that WGU is currently certified to participate in the federal student aid programs and is not subject to a limitation, suspension, or termination of its eligibility.
- WGU has an active Certificate of Authorization to transact business in Iowa as a foreign, non-profit entity, corporation #41533, filed June 9, 2011.
- Western Governors University is not required to seek the explicit approval of the Iowa Board of Nursing for its online baccalaureate or master's degree programs in nursing. However, the Iowa Board of Nursing communicated to the University guidelines for program offerings in Iowa that the University must follow.

Additional Information

WGU 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 2009): 4.9%
 - FFY 2009 national average cohort default rate: 8.8%
- Graduation rate (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): 16%

WGU indicates that the graduation rate data reported to the federal Department of Education is misleading because less than 13% of WGU students enroll as first-time, full-time undergraduates. WGU provided the following chart illustrating the percentage of students in various programs who graduated within 2 years from enrollment, 4 years from enrollment and 6 years from enrollment in bachelor, master, teacher endorsement and post-baccalaureate certificate programs.

| Program | 2 yrs | | | 4 yrs | | | 6 yrs | | |
|---------------------------------|----------|-------|-----------|----------|-------|-----------|----------|-------|-----------|
| | Students | Grads | Grad Rate | Students | Grads | Grad Rate | Students | Grads | Grad Rate |
| Bach. Arts | 2861 | 63 | 2.24 | 2141 | 463 | 21.63 | 1175 | 413 | 35.15 |
| Bach. Science | 3501 | 384 | 10.97 | 2255 | 495 | 21.95 | 959 | 374 | 39 |
| Master Arts | 407 | 87 | 21.38 | 283 | 125 | 44.17 | N/A | | |
| Master Arts Teaching | 182 | 26 | 14.29 | 567 | 194 | 34.22 | N/A | | |
| MBA | 543 | 151 | 28.81 | 361 | 173 | 47.92 | 56 | 30 | 53.27 |
| Master Education | 231 | 49 | 21.21 | 244 | 123 | 50.41 | 108 | 47 | 43.52 |
| Master Science | 529 | 159 | 30.06 | 24 | 7 | 29.17 | N/A | | |
| Teacher endorsement certificate | 20 | 9 | 45 | 19 | 11 | 57.89 | N/A | | |
| Other Post-Bacc. Certificate | 168 | 36 | 21.43 | 358 | 172 | 48.04 | N/A | | |

- Average loan debt of WGU graduates – \$18,358 for undergraduate degree graduates; \$17,838 for masters degree graduates

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

As a precursor to registration application, WGU applied for and was granted an exemption from the financial responsibility obligations of Iowa Code Section 714.18. The University claimed the exemption that applies to “colleges and universities authorized by the laws of Iowa or any other state or foreign country to grant degrees.” To substantiate its exemption claim, WGU provided a copy of a law enacted in the state of Washington that recognizes WGU as a self-funded postsecondary institution in that state.

Section 714.23 – State Tuition Refund Policy

WGU is exempt from Iowa Code Section 714.23 by virtue of its non-profit status.



This course of study presents the required sequence of learning steps and activities to help you develop competence in essay writing. Your competence will be assessed through the Language and Communication Assessment (LAE1), a performance assessment completed in TaskStream. It is important to your assessment preparation that you follow this document sequentially. This tool is designed to help you become an independent learner and to guide you to multiple learning resources. Depending on your educational background and work experience, this course of study can take up to four weeks. However, these steps may be completed more quickly than shown below, as determined in consultation with your mentor.

Introduction

Welcome to the Language and Communication domain at Western Governors University! In this course of study, you will be covering the material needed to demonstrate competence on the performance assessment.

As you work through the activities contained within this course of study, you will begin to address questions such as the following: Why is it important to identify my audience? Why is it important to understand the writing process? What is the difference between persuasive and informative writing?

Some of the activities you will be asked to complete may incorporate skills and knowledge you already possess. As you work through them, try to think of ways to apply this knowledge to your personal and professional life, as well as your career as a WGU student.

This course of study is designed to guide you through readings, lessons, and activities that will help you to gain competence in writing essays that aim both to inform and to persuade. The course of study will also guide you through topics and concepts that are pertinent to any writing task, such as audience awareness, genre identification, and essay writing strategies. Your competence in these areas will be assessed by one final performance assessment completed in TaskStream.

Specifically, the Language and Communication: Essay Writing performance assessment covers the following topics:

- adapting communication to specific audiences and purposes
- engaging in writing processes
- writing an informational essay
- writing a persuasive essay
- combining elements of informational and persuasive writing into one essay (informing to persuade)

Ultimately, this course of study will prepare you for the LAE1 performance assessment. For this assessment, which is administered in TaskStream, you will be



required to choose one of five essay prompts and compose an informative/persuasive essay of 750 to 1000 words in response to the prompt you chose. For a more detailed list of the areas you will be required to demonstrate competence in, please see the competency list below.

The following competencies will be covered in this course of study:

Competencies Covered:

Competency: Reading With Comprehension

The graduate constructs meaning by using multiple strategies to comprehend a variety of texts.

Competency: Reading Critically

The graduate identifies relationships among ideas, point of view, and language choices by reading critically.

Competency: Inquiry and Research

The graduate selects information from oral, written, or electronic sources to inform an audience about complex subjects.

Competency: Evaluating Information

The graduate accurately evaluates the validity, reliability, and significance of information in a given context.

Competency: Documenting Sources

The graduate documents sources consistently and accurately.

Competency: Adaptation

The graduate adapts a particular writing to meet the needs of a specific audience, purpose, and situation.

Competency: Writing as a Process

The graduate applies a process approach to creating effective writings for different audiences and purposes.

Competency: Mechanics of Writing

The graduate correctly applies rules of grammar, syntax, and punctuation.

Required Learning Resources:

Language and Communication Essay w/ eBooks

- Language and Communication Essay w/ eBooks is an independent learning resource hosted by Pearson Course Compass. It houses learning modules composed of readings from various eBooks, writing and grammar activities



and tutorials, and links to outside websites that provide additional writing instruction. The eBooks included are:

- Faigley, L. (2007). *Writing: A guide for college and beyond*. New York: Pearson Longman. ISBN 0-321-39626-X.
- Ruskiewicz, J., Seward, D. E., & Hairston, M. (2007). *SF writer* (4th ed.). New York: Pearson Longman. ISBN 0-13-233458-5.
- Smith, B. D. (2007). *The reader's handbook: Reading strategies for college and everyday life* (3rd ed.). New York: Pearson Longman. ISBN-10 0321476840.

Preparing for Success

In this section you will be introduced to the learning resources that you will need to achieve success in this area of study. Here you will find instructions on how to acquire the resources that are available to you.

Course Mentor Assistance

As you prepare to successfully demonstrate competence in this subject, remember that course mentors stand ready to help you. Their job is to aid your understanding in the areas where you must focus in order to improve, and to guide you to the learning resources that will help you do so. Please request their assistance as necessary in preparing for second attempts at objective assessments, or when you must revise assessment performance tasks.

Generally speaking, course mentors are not able to provide reviews of entire assessments, so please start by first reviewing the feedback that comes to you about the assessment. Try to identify the areas of difficulty and then ask the course mentors specific questions about what you can do to meet the competency standard. While they are not evaluators, and thus cannot guarantee you will pass an assessment, they will respond to your questions and provide the assistance and advice necessary to help you succeed.

LAE1 Contact Information:

For the quickest response time, please contact the LAE1 team by using the LAE1 email inbox: lae@wgu.edu or by calling the LAE1 group extension 1-866-895-9660 Ext. 1752.

The LAE1 team's coverage of the above inbox and extension is as follows:

Mondays - 7:00am - 7:00pm (Mountain Time)
Tuesdays - 7:00am - 7:00pm (Mountain Time)
Wednesdays - 7:00am - 7:00pm (Mountain Time)
Thursdays - 7:00am - 7:00pm (Mountain Time)
Fridays - 7:00am - 5:00pm (Mountain Time)
Saturdays - 12:00pm - 6:00pm (Mountain Time)



Sundays - 10:00am - 8:00pm (Mountain Time)

Contact information for individual mentors is available in the "About the Course Mentor" section.

The Learning Resources

The following activities will guide you through acquiring and accessing the learning resources required for this area of study.

Take the Student Self-Assessment

Before you begin your preparations for the performance assessment, you should complete the Student Self-Assessment (SSA) for this area. You can access the SSA by following these instructions:

1. Click on this link: <https://web5.wgu.edu/aap/content/LAE1%20SSA%2006042010.doc>
2. Download the Student Self-Assessment to your computer
3. Follow the directions on the Student Self-Assessment rating your knowledge of the various topic areas
4. Forward your results to your student mentor.

This Student Self-Assessment can be taken on your computer at home or any other convenient location. Do not use your notes or texts when completing the Student Self-Assessment. This will help indicate areas you will need to study before working on the performance assessment.

Enroll in the Learning Resources

eBooks

- Faigley, L. (2007). *Writing: A guide for college and beyond*. New York: Pearson Longman. ISBN 0-321-39626-X.
- Ruskiewicz, J., Seward, D. E., & Hairston, M. (2007). *SF writer* (4th ed.). New York: Pearson Longman. ISBN 0-13-233458-5.
- Smith, B. D. (2007). *The reader's handbook: Reading strategies for college and everyday life* (3rd ed.). New York: Pearson Longman. ISBN-10 0321476840.

To gain access to Language and Communication Essay w/ eBooks, you will need to enroll through your Degree Plan. Please follow the instructions below.

Register for Language and Communication Essay w/ eBooks:

1. Find this course of study on your Degree Plan.
2. Click on the "Learning Resources" tab.
3. "Language and Communication Essay w/ eBooks" should appear as a learning resource.



4. Click on the "Show Sections" button under the "Action" column.
5. On the next screen, click on the "Enroll Now" link under the "Action" column.

Follow these steps to access your learning modules:

1. First, you need to enroll in the learning resource called Language and Communication Essay w/ eBooks (located on the "Learning Resources" tab in your Degree Plan).
2. Then you will get an e-mail from the Learning Resources Department that contains your log-in ID and password information. If you cannot find this e-mail, please have your student mentor contact the Learning Resources Department, and they can retrieve it for you. Save all correspondence from the Learning Resources Department for future reference.
3. When you get to the Pearson MyLab/Mastering log-in page at <http://www.pearsonmylabandmastering.com>, enter your log-in information.
4. Once you have logged in, click on "Language and Communication Essay w/ eBooks." You will be taken to the main page where the learning modules are located. The purple menu on the side will allow you to navigate to the various modules, topics, and eBooks indicated in the course of study.

Please retain all e-mails and materials you receive regarding your learning resources. The information contained in these materials is very helpful.

Order a Hard Copy of the Required Textbooks (Optional)

As noted above, electronic versions of the texts aligned to this course of study are included in the Language and Communication Essay w/ eBooks learning resource that you will enroll in through your Degree Plan. If you would like hard copies of the texts, you can purchase them at your convenience.

Note: The WGU Bookstore has these books available for immediate purchase and delivery. You may shop at other online bookstores, but be sure to order early and use the correct ISBN to ensure that you get the correct edition.

The Message Board

If after using all of these learning resources you need further assistance, please feel free to post a question on the message board or contact a course mentor. Contact information for the course mentor can be found by clicking on the yellow "About the Course Mentors" button in the upper-right corner of this page.

Create a Study Journal

Create a place or document (electronic or manual) where you can take notes on the readings, vocabulary, guiding questions, and activities throughout this course of study. For ideas on how to divide this journal into sections, see the message board, or contact your student mentor or a course mentor.



Adaptation-Writing to the Audience

The topics and activities for this section will introduce you to the concepts associated with adaptation and writing to your audience.

Throughout the day, you may encounter times when you need to write well in order to communicate effectively. Each writing situation calls for the writer to meet the needs and backgrounds of different audiences. This skill is called adaptation.

Competencies covered by this subject

105.3.1 - Adaptation

The graduate adapts a particular writing to meet the needs of a specific audience, purpose, and situation.

105.3.2 - Writing as a Process

The graduate applies a process approach to creating effective writings for different audiences and purposes.

105.3.3 - Mechanics

The graduate correctly applies rules of grammar, syntax, and punctuation

Identifying Your Audience

What we write for an audience or reader is different each time because each piece of writing has a specific purpose for a particular situation. For example, writing to inform will produce a different kind of writing than writing to persuade; writing to create support for an issue is a different writing context than writing to explain a step-by-step process, etc. For the informative/persuasive essay you will write for the performance assessment, you will either be given an audience to write for or you will be asked to choose an audience. As you complete the following activities, try to think of different times in your life when you needed to write to a distinct audience. How could you have applied these concepts and ideas?

Access the Language and Communication Essay w/ eBooks learning modules using the information you received from the Learning Resources Department when you enrolled in the resource.

The menu on the right-hand side of the screen gives you access to the different learning modules and eBooks.

Your Study Journal

As you are working through the activities within this topic, be sure to address the following questions in your study journal:

- When you know whom you are writing for, how does that change the organization of your paper, the specific language you use, your explanation of your topic, and your approach to researching your topic?
- When you know what your purpose is as you write, how does that change your tone and the content you are writing about? What does that say about genre or type of writing?



"Organizational Patterns"

Read chapter 6, "Organizational Patterns," in *The Reader's Handbook*. Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- Notice the tips on writing for different audiences.
- Make note of the signal words used for different writing styles.

"Writers at Work"

Read chapter 1, "Writers at Work," in *SF Writer*. Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- Notice how many different writing situations exist and the demands of different audiences.
- Look at the section labeled "Purpose and Form," which introduces topics in other chapters of this book.

This chapter is key, as the next chapters build upon the information discussed in this chapter.

"Writing in College" and "Writing Effectively"

Read chapter 5, "Writing in College," and chapter 6, "Writing Effectively," in *Writing: A Guide for College and Beyond*. Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- Notice the explanation of genre which also addresses audience awareness.
- Explore the meaning of *rhetorical situation*, which is another term for audience awareness or adaptation.

Audience Awareness

Visit the following link to view a handout entitled "Audience" prepared by The Writing Center at the University of North Carolina at Chapel Hill: <http://www.unc.edu/depts/wcweb/handouts/audience.html>

Visit the following link to view an online resource entitled "Audience Awareness" provided by Purdue University's



Online Writing Lab: <http://owl.english.purdue.edu/owl/resource/629/01/>

As you visit these links, pay close attention to and take notes in your study journal on the following questions, concepts, and ideas. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance in the learning community as needed.

- How do audiences shape the decisions we make in our writing or communication skills?
- How do you analyze an audience as you write?

"Recognizing the Essay" and "Essay Organization"

Complete "Recognizing the Essay" and "Essay Organization" activities in module 1, topic 1 of the learning modules.

Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- Recognizing the Essay
 - Video: Recognizing the Essay
 - Video: How to Write an Essay
 - Quiz
- Essay Organization
 - Video: General to Specific Organization
 - Video: Specific to General Organization
 - Video: Importance Order
 - Quiz

Competence Builder: Practice Your Skills in Audience Awareness

To access this competence builder, go to the message board or to the Language and Communication: Essay Writing Learning Community for this topic.

Once you are logged in, look for the discussion titled "Competence Builder: Audience Awareness." Read the instructions posted in the thread and post your response. Participating in this discussion will help you prepare for the performance task and will also help you and your fellow students understand the concept of audience awareness in a much clearer way.

Learning the Writing Process

Good writers create a flow in their writing by forming a notable introduction, a series of elaborative and well-developed body paragraphs, and a creative and synthesized conclusion. For this course, you will learn how to formulate these three



parts of writing so that any writing task you have in the future can be a showcase of these skills.

The second skill you will practice is how to use the right kind of language for the task you are given. This means you will pay attention to the words you use to catch a reader's attention, as well as the placement of those words within an essay. Proper word choice and placement (called "syntax") creates emphasis, provides clarity, and facilitates proper audience awareness.

Recall situations in the past where you were asked to compose a specific piece of writing, like an email, a report, an essay, a letter, or a memo. As you read through and study the concepts listed below, consider: How could you have applied these concepts to your previous writing tasks? Which approaches would have allowed you to communicate your points and ideas to your audience as effectively as possible.

Your Study Journal

As you are working through the activities within this topic, be sure to address the following questions in your study journal:

- What is involved in the writing process that makes it easy or hard to communicate effectively?
- How does a clear introduction impact your writing task?
- What kind of plans, outlines, or mind-maps of your ideas would be essential for the body of your essay?
- How does revision help you become a better writer?
- How can your vocabulary (the variety and type of language) and the emphasis you use make your writing more professional?
- Enter your definitions, questions, and thoughts into your journal. You can use any of these notes to help you write your essays and to post questions to the message board for this course of study.

"Preparing to Write" and "Making a Point"

Read chapter 2, "Preparing to Write," and chapter 3, "Making a Point," in *SF Writer*. Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- Practice some free-writing ideas mentioned in chapter 2; this will help you with later essays you will write.
- Try the brainstorming technique in chapter 3 or the clustering technique to get ideas for your essay topic.
- Learn how to write a thesis statement in chapter 3.



"Planning a Journey" and "Returning and Revising"

Read chapter 3, "Planning a Journey," and chapter 4, "Returning and Revising," in *Writing: A Guide for College and Beyond*. Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- What is a thesis, and what are the steps involved in developing a thesis?
- How can a writing plan be used to organize ideas?
- What are valuable ways to organize details in the body of an essay?

"Introductions and Conclusions," "Editing the Essay," and "Revising the Essay"

Complete the "Introductions and Conclusions," "Editing the Essay," and "Revising the Essay" activities in module 1, topic 2 of the learning modules.

Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- Essay Introductions and Conclusions
 - Video: Introductions
 - Video: Conclusions
 - Quiz
- Revising the Essay
 - Video: Thesis Statements
 - Video: Basic Elements
 - Video: Development
 - Video: Unity
 - Video: Organization
 - Video: Coherence
 - Quiz
- Editing the Essay
 - Video: A Checklist
 - Video: How to Edit
 - Quiz

"Avoiding Errors," "Understanding Punctuation and Conventions," and "Writing in a Second Language"

Read chapter 31, "Avoiding Errors," chapter 32, "Understanding Punctuation and Conventions," and chapter 33, "Writing in a Second Language" in *Writing: A Guide for College and Beyond*. Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be



sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- What are some ways to fix fragments and run on sentences?
- What are some common uses for the comma?

Grammar Activities

Complete the grammar activities in module 1, topic 2 of the learning modules.

Take the Comprehensive Grammar Diagnostic 1. You will get automatic results indicating the questions you got correct and incorrect. Once you have your results, go to the "Grammar Video Tutorials" to work on specific grammar topics related to the questions you got incorrect. After viewing the tutorials, take grammar review quizzes related to your problem areas. When you have completed your study of grammar, take the Comprehensive Grammar Diagnostic 2 to see your progress.

- Comprehensive Diagnostics 1
- Grammar Video Tutorials
- Grammar Review Quizzes
- Comprehensive Diagnostics 2

Readings for Additional Grammar Instruction

If you would like additional practice in grammar, please read the selections listed below. As you read through the selections, be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance in the learning community as needed.

Read the following chapters in *SF Writer*:

- chapter 30 ("Key Grammatical Terms")
- chapter 31 ("Sentence Fragments, Comma Splices, and Run-ons")
- chapter 32 ("Modifiers")
- chapter 33 ("Subject-Verb Agreement")
- chapter 34 ("Verb Tense, Voice, and Mood")
- chapter 35 ("Pronouns")
- chapter 36 ("Suggestions for ESL Writers")
- chapter 37 ("End Punctuation")
- chapter 38 ("Commas")



- chapter 39 ("Semicolons and Colons")
- chapter 40 ("Quotation Marks and Ellipses")
- chapter 41 ("Parentheses and Brackets")
- chapter 42 ("Dashes, Hyphens, and Slashes")
- chapter 43 ("Italics and Capitalization")
- chapter 44 ("Apostrophes, Abbreviations, and Numbers")
- chapter 45 ("Spelling, Dictionary, Thesaurus")

Practice Area in Essay Writing

Visit the following link to access a resource called "The Writing Process," which is provided by Cleveland State University's Writing Center and provides a great section-by-section analysis of an essay writing experience: <http://www.csuohio.edu/academic/writingcenter/writproc.html>

As you view the resource, pay close attention to and take notes in your study journal on the following questions, concepts, and ideas. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance in the learning community as needed.

- What are good methods for generating ideas and starting an essay?
- What are key steps involved in developing a thesis, and where should this thesis be placed in an essay?
- How are strong, focused paragraphs developed?
- What are key steps to follow during revision?

Competence Builder: Practice Your Skills in Understanding Various Genres

To participate in this competence builder, go to the message board or to the Language and Communication: Essay Writing Learning Community for this topic.

Once you are logged in, look for the discussion titled "Competence Builder: Genre Identification." Read the instructions posted in the thread and post your response. Participating in this discussion will help you prepare for the performance task and will also help you and your fellow students understand the importance of genre identification in a much clearer way.

Writing a Persuasive Essay

The topics and activities for this subject will introduce you to the concepts associated with writing a persuasive essay.



Persuasive writing is all about giving good reasons for a thesis. These reasons are supported by good claims. This writing experience will explore how to define a clear thesis or position and support it with strong evidence.

Competencies covered by this subject

105.3.1 - Adaptation

The graduate adapts a particular writing to meet the needs of a specific audience, purpose, and situation.

105.3.2 - Writing as a Process

The graduate applies a process approach to creating effective writings for different audiences and purposes.

105.3.3 - Mechanics

The graduate correctly applies rules of grammar, syntax, and punctuation

Persuasive Writing

Have you ever been in an argument before? Have you ever had to defend an issue that is important to you? Most of us have, and the following activities will aid in guiding you through developing and refining the skills necessary for good persuasive writing. You will learn how to write a persuasive essay that defines an issue, states your position on the issue, and provides reasoning and evidence to support that position. Additionally, you will learn how to acknowledge other views on the issue and establish why your position is superior.

"Writing With Style" and "Strategies of Argument"

Read chapter 11, "Writing With Style," and chapter 18, "Strategies of Argument," in *SF Writer*.

Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- How do you write with details and use parallel structure?
- How do you write balanced sentences and cumulative sentences?
- How do you make a claim?
- How do you present evidence?
- How do you find logical reasons?
- How do you structure the argument?
- What are some strategies of argument which may help you write your essay effectively?
- What are some argumentative fallacies you need to avoid?
- Read the paper that appears in this chapter as an example.

"Comparing and Contrasting," "Cause and Effect," and "Argument"

Complete the "Comparing and Contrasting," "Cause and Effect," and "Argument" activities in module 2, topic 3 of the learning modules.



Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- Comparing and Contrasting
 - Video: Comparison and Contrast Essay
 - Quiz
- Cause and Effect
 - Video: Cause and Effect Essays
 - Quiz
- Argument
 - Video: Persuasive Essays
 - Quiz

"Arguing for a Position" and "Arguing for Change"

Read chapter 13, "Arguing For a Position," and chapter 14, "Arguing for Change," in *Writing: A Guide for College and Beyond*.

Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- Chapter 13 has numerous examples of a position on an argument. There is a template for writing an argumentative paper on page 462.
- Chapter 14 contains clear help for writing a persuasive paper. A sample outline of an argument for change starts on page 486.
- There are also numerous examples throughout the chapter and a template on page 524.
- Please keep in mind that the templates presented in the eBooks do not necessarily address the specific requirements of the performance assessment.

Writing a Persuasive Paper

URL: <http://www.uvu.edu/owl/pdf/persuasive.pdf>

Follow the link above from the Utah Valley University Writing Center for a handout entitled "Persuasive Writing" that will help you compose a persuasive paper. As you view the handout, pay close attention to and take notes in your study journal on the following questions, concepts, and ideas. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- What are the steps involved in writing a persuasive paper?
- Would this example be helpful to use as a template for future persuasive



writing tasks?

Attend an LAE Web Chat

Attend a Web Chat Attend a web chat for this course of study to gain ideas about informative/persuasive writing strategies. Invitations to web chats are sent to Language and Communication students weekly and are also posted on the message board and in the learning community. If you are unable to attend a web chat, you can view the PowerPoint associated with the chat by locating the appropriate link under "Viewing Web Chat PowerPoints" on the message board or under documents in the learning community. Here is a link to the main page of the community:

http://community.wgu.edu/clearspacex/community/language_and_communication_essay_learning_community

Practice Essays

You may write practice essays on the prompts included in module 2, topic 3 of the learning modules. Please keep in mind that these essays are just for practice, and they are not graded by Pearson or the course mentors.

- Look under module 2, topic 3 of the learning modules and review "The Writing Process."
- After reviewing the writing process, locate the practice prompts.
- Choose one of the prompts and write an essay in response.
- Save a copy of your essay for future reference. It is not necessary to submit this essay to anyone.

Writing an Informational Essay

The topics and activities for this section will introduce you to the concepts associated with writing an informational essay.

Informative essays are written daily as reports at work, recipes for sharing, and step-by-step directions for household chores and projects. They are useful essays for conveying information in a straightforward and creative manner.

Competencies covered by this subject

105.3.1 - Adaptation

The graduate adapts a particular writing to meet the needs of a specific audience, purpose, and situation.



105.3.2 - Writing as a Process



The graduate applies a process approach to creating effective writings for different audiences and purposes.

105.3.3 - Mechanics

The graduate correctly applies rules of grammar, syntax, and punctuation

Informative Essay Writing

Why is informative writing important? Where have you encountered this style of writing before? When you begin to write an informational essay, keep in mind that your main goal is to present content to the reader in a clear and organized manner. First, organize your thoughts in an order that makes sense to you. Next, decide on an argument, called a thesis statement, which will encompass your ideas. Finally, think of clear examples and details that will make the report come alive.

"Creating a Structure"

Read chapter 5, "Creating a Structure," in *SF Writer*.

Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- How can you use models to create a structure for you essay?
- What different types of outlines can you create to structure your essay?

"Illustrating," "Narrating," "Describing," "Process," and "Definition"

Complete the "Illustrating," "Narrating," "Describing," "Process," and "Definition" activities in module 3, topic 4 of the learning modules.

Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- Illustrating
 - Video: Illustration Paragraphs
 - Quiz
- Narrating
 - Video: Narration Paragraphs
 - Quiz
- Describing
 - Video: Description Paragraphs
 - Quiz
- Process



- Video: Process Essays
- Quiz
- Definition
 - Video: Definition Essays
 - Quiz

"Reflecting," "Observing," and "Informing"

Read chapter 7, "Reflecting," chapter 8, "Observing," and chapter 9, "Informing," in *Writing: A Guide for College and Beyond*.

Pay close attention to and take notes in your study journal on the following questions, concepts, and ideas as you read these selections. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- What are some common characteristics of reflection essays?
- In what situations might you be called upon to write a reflection?
- What are some common characteristics of observation essays?
- In what situations might you be called upon to write an observation?
- What are some different types of informative essays?
- In what situations might you be called upon to write to inform?

Writing an Informative Paper

URL: <http://archive.metrostate.edu/writingcenter/clues/inform.html>

Follow the link above to visit a useful resource on informative writing from the Writing Center at Metropolitan State College. As you view the resource, pay close attention to and take notes in your study journal on the following questions, concepts, and ideas. Be sure to define any vocabulary, clarify any confusing topics, and answer all of the listed questions, seeking assistance on the message board as needed.

- View the outline to help guide your paper writing.
- Look at the editing checklists that are contained in the outline.

Attend an LAE Web Chat

Attend a Web Chat Attend a web chat for this course of study to gain ideas about informative/persuasive writing strategies. Invitations to web chats are sent to Language and Communication students weekly and are also posted on the message board and in the learning community. If you are unable to attend a web chat, you can view the PowerPoint associated with the chat by locating the appropriate link under "Viewing Web Chat PowerPoints" on the message board or under documents in the learning community. Here is a link to the main page of the community:



http://community.wgu.edu/clearspacex/community/language_and_communication_essay_learning_community

Practice Essays

You may write practice essays on the prompts included in in module 3, topic 4 of the learning modules. Please keep in mind that these essays are just for practice, and they are not graded by Pearson or the course mentors.

- Look under module 3, topic 4 of the learning modules and review video tutorials from the "Office Hours" series and the "Writing in Action" series.
- After reviewing the videos, locate the "Text-based Activities: Inform."
- Choose one of the prompts and write an essay in response.
- Save a copy of your essay for future reference. It is not necessary to submit this essay to anyone.

Writing an Informational and Persuasive Essay

The topics and activities for this section will introduce you to the concepts associated with writing an informational and persuasive essay for your performance assessment.

In TaskStream, you will pick one of five essay prompts and compose a combination informative/persuasive essay in response.

Competencies covered by this subject

105.3.1 - Adaptation

The graduate adapts a particular writing to meet the needs of a specific audience, purpose, and situation.

105.3.2 - Writing as a Process

The graduate applies a process approach to creating effective writings for different audiences and purposes.

105.3.3 - Mechanics

The graduate correctly applies rules of grammar, syntax, and punctuation.

The Next Steps: Final Preparation and Assessment

These last activities will guide you through the final steps leading up to your completion of the performance assessment.

Review Major Points:

In this course, you learned how to write an introduction that revealed the intentions



or thesis of your essay. You created a body in your essay that had major points elaborated by details, and you found a way to create an effective conclusion. All of this happened because you carefully reviewed grammar, sentence structure, punctuation, and paragraph development. You also learned how to use vivid language and write clear descriptions of your thoughts in your informational essay. When it came to your persuasive essay, you wrote convincing, factual evidence to support your claims and issues. Now, you are ready to showcase your skills by composing a strong and focused informative/persuasive essay.

Submit a Practice Essay in the Peer-Review Thread

Complete a practice informative/persuasive essay and post it on the peer-review thread located on the learning modules message board, the course of study message board, and/or in the Essay Learning Community. Here is a link to the main page of the community:

http://community.wgu.edu/clearspacex/community/language_and_communication_essay_learning_community

Submit a Practice Informative/Persuasive Essay to a Course Mentor for Feedback

You have the opportunity to submit one practice informative/persuasive essay to a course mentor for feedback. This practice essay can be on a topic of your choosing except for those listed in the assessment prompts. Course mentors cannot review first submissions of actual assessments; however, course mentors are happy to look over practice essays. You can e-mail your practice essay to a course mentor directly, or you can email the essay to languageandcommunication@wgu.edu. When you e-mail the essay, be sure to specify that the essay is a practice essay for LAE1.

The LAE1 Performance Assessment

You are now ready to demonstrate your competency in the Language and Communication domain by taking the performance assessment.

Access the LAE1 Performance Assessment

Follow these directions for [accessing your performance assessments](#).

Complete the LAE1 Assessment

In this final task you will turn in your completed essay.



In this assessment, you will write an essay that is **both** informational and persuasive in response to your chosen prompt, using the tools and methods you have learned about previously in this course of study. You are not expected to have any prior research on the topics, though you can use research if you choose. You should be able to compose a cohesive essay using information you already know as well as ideas and information you already have. For the persuasive part of the essay, your evidence or support may be in the form of examples, details, or elaboration on the idea that you present. The essay should be in APA format (double-spaced, Times New Roman or similar font, one-inch margins) and around 750 to 1000 words in length. The full essay directions and rubrics are found in TaskStream. Please review these prior to submission.

Before submitting, check to see if you have completed the following:

- Have you written an essay of about 750 to 1000 words that both informs and persuades in response to one of the given prompt topics in the task directions?
- Do you express the purpose of the essay in your introduction?
- Do you include a thesis statement at the end of your introduction that reveals your persuasive argument in terms of your chosen prompt?
- Do you provide detailed information about the topic?
- Do you provide a persuasive argument related to the topic?
- Do you provide an appropriate body that presents well-developed support for your thesis (i.e., examples, details, or elaboration)?
- Do you provide an appropriate conclusion?
- Do you use appropriate stylistic elements of voice and tone?
- Do you use appropriate stylistic elements of word choice?
- Do you include appropriate transitions between paragraphs and main ideas?
- Have you double-checked your sentences to ensure they flow smoothly and are easy to follow in your essay?
- Do you appropriately cite all outside source information (if you chose to incorporate outside research) with correct APA in-text citations and a "References" page?
- Have you read the paper aloud to identify awkward words or phrases and to discover areas of your essay that may need more development?
- Have you proofread your paper for all writing conventions?

If you have any further questions or would like a more detailed list, please see the rubric in TaskStream.

Conclusion

Congratulations on completing the topics and activities throughout the Language and Communication: Essay Writing Course of Study! You learned new strategies and had helpful experiences writing clear essays. As you move forward, consider how this information can be applied to your personal and professional life.



For your convenience, screenshots showing the instructions for each performance task related to this course of study are available at the links below. Please note that the instructions may change slightly from time to time. For the most up-to-date instructions, evaluation rubrics, and other related material, please log in to TaskStream. You will not have access to these tasks in TaskStream until you request them through your Degree Plan and your mentor approves your request.

- LAE1 [Task 1](#)

Transfer/Application to Work

Now that this course is done, you will be able to transfer these ideas to work and lifelong learning settings when you have to communicate about a situation that demands detail or includes persuading someone to join you in a venture. This might include writing reports at work or creating factual and informational documents for your home or neighborhood community. You might be writing a family memoir, creating a community plan, applying for a grant, writing a school board assessment, evaluating a colleague, writing a recommendation, or persuading someone to hire you for a job. All of these experiences might entail using the skills from this course.

Feedback

To provide feedback on this or any other course of study, please use the [Course of Study Feedback form](#).

ADA Requirements

Please review the [University ADA policy](#).

IOWA COLLEGE STUDENT AID COMMISSION

Nebraska Wesleyan University Application for Postsecondary Registration in Iowa November 2011

RECOMMENDED ACTION:

Approve Nebraska Wesleyan University (NWU) for a provisional registration period of 18 months in order to permit the University to secure approval through the Higher Learning Commission (HLC) to establish a site in Iowa.

During this provisional period, Nebraska Wesleyan University must:

- Not offer any in-person instruction at a location in Iowa
- Report to the Commission its progress on achieving HLC approval of an Iowa site at 6-month intervals

Upon HLC approval of an Iowa site — and provided that approval occurs before the expiration of the 18-month provisional registration period — Nebraska Wesleyan must request that the Commission remove its provisional registration status, extend its registration period to the full term, and authorize it to initiate in-person instruction in Iowa. At that time, Nebraska Wesleyan University must demonstrate that 1) it has received HLC approval to operate at a site(s) in Iowa; and 2) it meets an Iowa administrative rule requirement to employ a full-time Iowa-resident faculty member or program coordinator that is devoted to Iowa students.

If the 18-month provisional registration period expires before the HLC approves NWU for an Iowa site, Nebraska Wesleyan must submit a new registration application in order to initiate in-person instruction in Iowa.

Registration Purpose

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...” NWU proposes to offer a baccalaureate and master’s level nursing program in Iowa via in-person instruction. Staff required NWU to register for this reason. NWU does not seek registration in order to offer distance education programs to Iowans.

Background

NWU is a private, non-profit institution that operates its main campus at Burt Hall, University College, 5000 Saint Paul Avenue, Lincoln, Nebraska. The school also operates a course location site in Omaha, Nebraska. The University’s chief executive officer is Frederik Ohles (same address). NWU is registered with the Iowa Secretary of State’s office. Its registered agent is CT Corporation System, 500 East Court Avenue, Des Moines, IA 50309.

NWU provides documentation to substantiate that it is accredited by the Higher Learning Commission (HLC) for operation at sites in Nebraska (see above).

Programs Offered In Iowa

NWU seeks to offer a Bachelor of Science in Nursing (RN to BSN) and a Master of Science in Nursing via in-person instruction in Iowa.

Costs for the RN to BSN program are as follows:

Tuition – \$315 per credit hour

Books – average \$75 per course; \$450 per year for part-time students; \$750 per year for full-time students

Fees – matriculation fee \$100; criminal background check fee \$30

Costs for the Master of Science in Nursing program are as follows:

Tuition – \$425 per credit hour

Books – \$1102 per year

Fees – matriculation fee \$100; criminal background check fee \$30

Miscellaneous Fees

- Application fee – \$50 graduate students only
- CLEP examination fee – \$102; per examination \$10; per hour earned \$115 for undergraduate students, \$150 for graduate students
- Lifelong learning portfolio application fee \$100

Proposed Location in Iowa

NWU proposes to offer RN to BSN and Master of Science in Nursing programs via in-person instruction at Iowa Western Community College (IWCC) locations in Council Bluffs and Clarinda, Iowa. In addition, NWU seeks to offer a limited number of specific courses in the RN to BSN program at IWCC sites in Atlantic, Harlan, and Shenandoah, Iowa. IWCC offers the University classroom space in its Center for Advanced Nursing and Allied Health Education at its Council Bluffs campus. At its Clarinda campus, IWCC offers NWU dedicated space for its nursing program, including a simulation lab, and is positioned for growth. IWCC and NWU currently have an articulation agreement that guarantees NWU will accept toward the RN to BSN program the maximum allowable credits earned by a student who has completed an associate degree in nursing at IWCC. Presently, Iowans who transfer to NWU under this arrangement must travel to NWU's Omaha campus to attend classes.

Both the RN to BSN and the Master of Science in Nursing programs are intended for currently registered nurses who wish to advance their skills and educational credentials. Neither program is intended to prepare a student for initial licensure as a nurse.

NWU's registration application includes a letter written by IWCC President Dan Kinney in which he expresses his support of NWU's Iowa registration application. President Kinney states that the educational opportunity NWU offers in his region of Iowa is needed to address a critical

nursing shortage in that region. President Kinney states the credentials NWU offers will benefit place-bound Iowa students, provide the region's health care providers with health professionals that have a high level of education, and provide IWCC with a pool of potential faculty. President Kinney states that no other institution of higher education in his region offers the advanced nursing degrees that NWU wishes to provide in Iowa.

Registration Compliance

As required by Iowa Code Section 261B.4, NWU disclosed its policy on refunding tuition charges for withdrawn students. The policy is located in the University's Catalog. The school's specific tuition refund policy is not a criterion for registration.

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. NWU provides these disclosures in its Catalog, Annual Security Report, Student Handbook, Nursing Program Handbook for Students, and in campus judicial procedures available upon request from the Student Life 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, NWU updated its policy to meet the requirements of Iowa Code, providing the requisite options to a spouse of a service member with a dependent child. The University will implement this revised policy upon registration and will disclose the policy to students in its catalog.

In its registration application, the University affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires disclosure to students of information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. These disclosures are duplicative of the federal Department of Education's student consumer information disclosure requirements for a school that participates in the federal student aid programs and are provided in the University's catalog, in course schedules for University College Wesleyan Advantage-Omaha (programs for adult learners that include the RN to BSN and Master of Science in Nursing programs), advisor forms, and the University's Nursing Program Handbook for Students.

NWU discloses in its application its procedures for preserving student records. Academic records for current and former students are securely maintained in the Office of the Registrar. The University maintains all educational records according to the standards of the American Association of Collegiate Registrars and Admissions Officers (AACRAO). Transcripts for students and graduates since 1992 are electronic and are backed-up on secure off-campus servers. Official files are maintained in the Registrar's Office until 10 years from the last date of attendance. At that time, the file's contents are scanned and downloaded to CDs for easy access as well as maintained electronically on secure off-campus servers. NWU is compliant with federal regulations regarding the storage, retention, and security of financial records. NWU has also adopted an Information Security Program for highly critical and private financial and related information that complies with the Gramm-Leach-Bliley Act.

The following information is to be used by students and graduates who seek transcript information:

Bette Olson, Assistant Dean for Institutional Effectiveness & University Registrar
Registrar's Office
500 Saint Paul Avenue
Lincoln, NE 68504-2796
Phone : (402) 465-2237
Fax : (402) 465-2565

NWU affirms 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 believes 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. Staff requests that the Commission permit this limited disclosure under these conditions.

NWU complied with the following additional administrative rule requirements for a registration applicant:

- The University submitted the report of an independent auditing firm, Strain Slattery Barkley and Co., CPAs, P.C., dated September 17, 2010, for the institutional fiscal year ending May 31, 2010. The auditing firm expressed 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 "financially responsible" without additional oversight. Staff did not find that the University's auditing firm reported or tested its composite score. The most recent composite score available from the federal Department of Education for the University is for the school fiscal year that ended May 31, 2010; the University's composite score was 2.7.

- The University discloses in its application how it provides remote students with access to learning resources made available by its library in Lincoln, using its Omaha campus

students as an example. Omaha students have web-based access to the Cochran-Woods Library, the Student Health and Wellness Center, the Career and Counseling Center, financial aid resources, academic advising, services for students with disabilities, the Cooper Center for Academic Resources, and multicultural programs and services. Iowa students will be provided similar services and modes of delivery. On-site programming similar to that provided to students in Omaha will be provided to Iowa students for advisement and other selected services as student needs dictate.

Library resources include books, journals, videos, online databases and other resources and services to support both the Bachelor and Masters of Science in Nursing degrees. Library materials are routinely delivered electronically to nursing students via requests made on the University's library website. Journal articles are available via e-mail. Books may be delivered by mail or commercial carrier. Students may access library reference resources by mailing or phoning the library during regular hours. Library services will also be available through IWCC to students attending NWU programs at the IWCC sites in Clarinda and Council Bluffs. In addition, students have access to the library materials of other colleges and universities through the Nebraska Independent College Library Consortium, which makes the electronic catalogs maintained by nine other schools available to students. NWU also has borrowing agreements with the libraries of all postsecondary educational institutions in Nebraska.

- The University provided sufficient information about its policies for hiring full- and part-time faculty to indicate that it employs individuals who have degrees, special training, experience, or other accomplishments that qualify them for their assignments. For nursing faculty, the University follows the general regulations of the Nebraska State Board of Nursing, which specify that nursing faculty hold a minimum of a master's degree in nursing. Since all full-time faculty and most part-time faculty teach both undergraduate and graduate students, the Nursing Program attempts to hire doctorally prepared faculty whenever possible. Because of the local and national shortage of nursing faculty with doctoral degrees, the Nursing Program has used a mix of faculty with an earned doctorate and faculty with an MSN and significant professional experience in their areas of instruction, with the expectation that they (particularly full-time faculty) complete their doctoral degrees. NWU will follow these established procedures for any faculty hired to teach in the Iowa program.
- The University discloses on the application its methodology for developing and evaluating curriculum. NWU's nursing faculty are responsible for the development and evaluation of all nursing courses. The faculty role in curriculum development and assessment is summarized in Standards 4 and 6 of the Systematic Plan of Evaluation completed for the National League of Nursing Accreditation Commission self-study report of 2010, which is attached to the application. Full-time nursing faculty meet weekly and hold an annual retreat to facilitate communication and maintenance of programmatic quality.
- NWU provides sufficient assurances that it has made arrangements for adequate physical facilities appropriate to the program to be offered via in-person instruction in Iowa. As previously noted, IWCC has offered NWU space in its Center for Advanced Nursing and Allied Health Education on the Council Bluffs IWCC campus, and dedicated classroom and simulation lab space at the IWCC campus in Clarinda. IWCC will provide traditional classroom space at its other three centers in Atlantic, Harlan, and Shenandoah sufficient

for students to take two courses at least twice per year. NWU's registration application includes a letter from IWCC President Dan Kinney in which he confirms NWU's ability to use IWCC facilities.

- NWU provided a signed letter from President Frederik Ohles in which he requests approval to offer the University's RN to BSN and Master of Science in Nursing programs in Iowa. President Ohles states that NWU is committed to the successful delivery of its RN to BSN and MSN programs in Iowa. In the extremely unlikely event that this program(s) would close before students completed their courses of study, NWU commits to providing alternative teach-out options so all enrolled students can complete their programs.
- *Full-Time Iowa Resident Faculty Member or Program Coordinator.* At this time, NWU does not comply with the requirement of administrative rule to employ a full-time Iowa resident faculty member or program coordinator who is devoted to Iowa students. Since NWU will not be permitted to provide in-person instruction in Iowa during the provisional registration period while it awaits HLC approval of an Iowa site, there is no value for Iowans in requiring the school to comply at this time. However, as noted above under "Recommended Action," NWU must demonstrate that it has a full-time Iowa faculty member or program coordinator devoted to Iowa students at the time it requests the Commission's authorization to begin in-person instruction in Iowa. NWU states that it plans to hire a full-time faculty coordinator and a .75 time staff person dedicated to Iowa. Because courses will be staggered at Council Bluffs and Clarinda, NWU expects to divide the staff time between the two locations, thereby having a staff person available at each campus on the days students are in class, as well as other days as needed. Between these two staff, NWU will provide Iowa students with access to a staff member all day, as defined by NWU's class schedule, at both the Council Bluffs and Clarinda campuses. NWU will also have Omaha-based nursing faculty circulating through both campuses, as well as the University's Director of Nursing. NWU plans to make staff available to students at the other IWCC sites (Atlantic, Harlan, and Shenandoah) before and after class and by appointment (NWU will offer only two classes twice per year at these IWCC sites).

The University discloses its process for addressing complaints by students enrolled in its nursing programs in the Nursing Program Handbook for Students. A student with a complaint about a faculty member is encouraged to attempt to resolve the issue with that faculty member. Students may direct all complaints and concerns to the Director of Advantage-Omaha. Once an Iowa Faculty Coordinator is hired, students may direct complaints and concerns to this individual. If resolution cannot be reached at that level, the student may refer the complaint to the University College Dean. Students who believe that his/her grades are incorrect or unfair should follow the University's procedures for grade change/appeals found in the University catalog. Complaints of sexual harassment should be directed to assigned Resources Persons, who are trained in harassment issues. These individuals are identified on the NWU website.

Verifications

- The federal Department of Education reports that NWU is currently accredited by the Higher Learning Commission (HLC) and that its nursing programs are accredited by the

National League for Nursing Accrediting Commission. Both are entities that the federal Department of Education recognizes.

- The HLC reports that the institution is accredited, although not for a site(s) in Iowa at this time. HLC requires NWU to secure prior approval before establishing a new site. Staff has been in contact with HLC representative Eric Martin concerning the process that NWU should follow to achieve HLC approval to operate in Iowa, and to determine the HLC's expectations of the Commission in that process. The HLC advises that it is unlikely to move forward with the school's application for an Iowa site without the Commission's authorization for NWU to operate in Iowa. NWU submitted its application to HLC for additional site(s) in Iowa on October 13, 2011. Due to uncertainties about what form the HLC review and approval process will take and given HLC's full agenda of accreditation issues, staff recommend a provisional registration period of 18 months. In a prior case, when another out-of-state school requested provisional registration to secure HLC approval for an Iowa site, the Commission granted a one-year provisional period but the school was unable to secure HLC approval for an Iowa site within that time frame. Staff believe that there is greater likelihood that there will be sufficient time for the school to secure HLC approval for an Iowa site and secure the Commission's subsequent authorization to initiate instruction in Iowa during the greater, 18-month time frame.
- The National League for Nursing Accrediting Commission reports that NWU's baccalaureate and masters level nursing programs are accredited.
- The federal Department of Education reports that NWU is currently certified with no restrictions to participate in the federal student aid programs.
- NWU has an active Certificate of Authorization to transact business in Iowa as a foreign, non-profit entity, corporation #411968, filed February 18, 2011.
- NWU is not required to seek the approval of the Iowa Board of Nursing for baccalaureate or masters level nursing programs that it proposes to offer via in-person instruction in Iowa, even though NWU will provide instruction at a site located in Iowa. NWU must ensure that any NWU nursing faculty providing instruction in Iowa possesses a current Iowa nursing license or is recognized for licensure in Iowa pursuant to the nurse licensure compact contained in Iowa Code chapter 152E.

Additional Information

NWU 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 2009): 1.4%
 - FFY 2009 national average cohort default rate: 8.8%
- Graduation rate (percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion): 65%

- Average loan debt of NWU graduates (2010 graduates that entered NWU as first-year students): \$24,873

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

As an addendum to its registration application, NWU submitted sufficient evidence of financial responsibility as required by Iowa Code Section 714.18, including documentation of a bond issued by Old Republic Surety Company, payable to the state of Iowa, in the requisite amount of \$50,000.

Section 714.23 – State Tuition Refund Policy

NWU is exempt from Iowa Code Section 714.23 by virtue of its non-profit status.

IOWA COLLEGE STUDENT AID COMMISSION

Grand Canyon University Application for Postsecondary Registration Amendment November 2011

RECOMMENDED ACTION:

Approve Grand Canyon University's application for an amendment to its Iowa registration to add its practitioner preparation programs.

Grand Canyon University (GCU) is reminded that as a condition of registration, GCU must notify staff per Iowa Code Section 261B.5 within 90 days of the University's approval of any Iowa location at which an online degree candidate will fulfill a practicum, student teaching, or internship requirement. This includes students who are participating in student teaching or school administrator practica at an Iowa location. An option, GCU elect to notify the Commission every 90 days of its Iowa practicum, student teaching, or internship sites.

Amendment

Iowa Code Section 261B.3A, subsection 2, requires a school that offers a practitioner preparation program to first obtain the approval of the Iowa Board of Education before the Commission may authorize the school to offer such a program under its Iowa registration. In September, 2011, GCU obtained the approval of the Iowa Board of Education to offer its teacher and school administrator preparation programs in Iowa via distance education. A student that completes these programs does not qualify for initial licensure in the state of Iowa. The student must first obtain a teacher or, as applicable, school administrator license in the state of Arizona and may then apply to the Iowa Board of Educational Examiners for an Iowa license through a process commonly referred to as reciprocity.

Additional Programs

GCU requests to add the following practitioner preparation programs to its Iowa registration:

- ✓ Bachelor of Science in Early Childhood Education
- ✓ Bachelor of Science in Elementary Education
- ✓ Bachelor of Science in Elementary Education/Early Childhood emphasis
- ✓ Bachelor of Science in Elementary Education/Special Education (dual major)
- ✓ Bachelor of Science in Secondary Education
- ✓ Master of Education in Elementary Education
- ✓ Master of Education in Secondary Education
- ✓ Master of Education in Special Education
- ✓ Master of Education in Educational Administration

Each of the programs listed above prepares students for licensed employment as a teacher or school administrator.

For teacher candidates, student teaching experiences are 16 weeks in length. GCU students are responsible for selecting potential student teaching sites, subject to final approval by GCU. Cooperating teachers, who provide direct classroom supervision and evaluation of the student, must be licensed teachers with a masters degree and three years of teaching experience. Students are assigned a GCU faculty supervisor who oversees the student teacher and conducts four on-site visits. The GCU faculty supervisor must also be a teacher licensed in the area over which supervision is provided with, at minimum, a masters degree and a minimum of three to five years of classroom experience.

Principal candidates who are completing the Master of Education in Educational Administration program must complete practicum hours that are imbedded in six of the program courses and a 16-week internship at the end of the program. The practicum and internship experiences must be completed in a state-approved school under the supervision of a qualified administrator with a current administrator license. During the 16-week internship, principal candidates are assigned a GCU adjunct faculty supervisor who resides near the internship site. This person must be a licensed administrator with a masters degree in educational administration and a minimum of 2-3 years of administrative experience.

GCU provided staff with detailed handbooks that outline the responsibilities of teacher and administrator preparation program students in field experiences, as well as the responsibilities of on-site evaluators and GCU faculty who provide oversight.

IOWA COLLEGE STUDENT AID COMMISSION

Postsecondary Registration in Iowa November 2011

Recommended Action: Authorize staff to approve all registration exemption claims under Iowa Code Chapter 261B.11

Previously, staff referred formal applications from colleges for registration exemption to Commissioners for approval. The most recent occasion when that occurred was September of 2010. Since then, due to federal regulatory changes, staff have been contacted by over 450 out-of-state colleges and universities requesting guidance on Iowa's registration requirements. As Commissioners are aware, staff implemented a policy that requires an out-of-state distance education provider to register only if the provider's distance education program or its operations relative to that program include some activity that will take place at a location in Iowa. Those whose programs and operations do not trigger registration are in the majority. Essentially, these schools are treated as exempt from registration. To timely address school requests for documentation to substantiate the school's compliance with federal regulations, staff are currently providing schools with written confirmation that the school's current activities and programs do not trigger registration. Staff have also proposed Iowa Code changes that would require schools that may qualify for an exemption to formally apply for approval of the exemption. Given the volume of formal postsecondary registration exemption requests that would arise under this change, and so that schools that are not required to register receive timely feedback on their registration status, staff asks the Commission to officially delegate to staff the responsibility for making a final determination about an entity's eligibility for a registration exemption. Staff currently exercises this authority for exemption claims filed under chapter 714, in consultation with the Consumer Protection Division at the Iowa Attorney General's office, as needed.

IOWA COLLEGE STUDENT AID COMMISSION

Postsecondary Registration in Iowa November 2011

Discussion item: New degree-granting schools that wish to initiate operation in Iowa

Staff received authorization from the Commission in September 2011 to advance a proposed Iowa Code change that allows the Commission to grant provisional registration of a school for the purpose of achieving accreditation by an entity recognized by the federal Department of Education. The purpose of this change is to address circumstances that have been described in the past as “the chicken or the egg” issue. For example, a school that is already accredited to operate in a state other than Iowa wishes to begin in-person instruction at a site in Iowa. Iowa law requires the school to first be accredited before the school is registered in Iowa. The accrediting agency requires the school to request its approval for substantive operation at a site outside of its home state and will not move forward on the school’s request for accrediting agency approval of an Iowa site until the school is registered to operate in Iowa.

However, provisional registration for the purpose of accreditation might also enable a new degree-granting school to lawfully begin program offerings for the first time in Iowa until it achieves accreditation. Currently, Iowa law makes it impossible for a new degree-granting institution to establish itself in Iowa, unless it qualifies for a religious-based exemption (for example, Shiloh University) or the exemption staff proposes to strike for non-profit schools established by city ordinance. (Note that under current registration exemptions, a new school that only wishes to offer postsecondary certificates or diplomas is not restricted from initiating operation in Iowa.)

Discussion Points:

- *Do Commissioners believe that it is the purposeful intent of Iowa law to prevent, in most cases, the establishment of a new degree-granting school in Iowa?*
- *If not, what action is necessary to ensure that staff have sufficient guidance and resources to ensure a reasonable level of student consumer protection in the case when an entity desires to establish a new degree-granting institution in Iowa under the Commission’s authorization and in the interim until the entity achieves regional or national accreditation?*

Iowa College Student Aid Commission

**Legislative Action Committee
November 2011**

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

IOWA COLLEGE STUDENT AID COMMISSION
 GUARANTEED STUDENT LOAN ADMINISTRATION
 SUMMARY OF RESOURCES AND EXPENDITURES
 SFY 2012 as of October 31, 2011

| Operating Fund | Class | FY 2012 Operating Budget | FY 2012 Year to Date Budget | FY 2011 Oct-10 Mth Actual | FY 2012 Oct-11 Mth Actual | FY 2011 Year to Date Actuals | FY 2012 Year to Date Actuals | YTD Actual to Budget Variance |
|---|--|--------------------------------|-----------------------------------|---------------------------------|---------------------------------|------------------------------------|------------------------------------|-------------------------------------|
| Revenues/Resources: | | | | | | | | |
| 1 | Federal Account Maintenance Fees (AMF) | 1,551,202 | 387,801 | - | - | - | - | (387,801) |
| 2 | Federal Loan Processing Fee (LPIF) | - | - | - | - | - | - | - |
| 3 | Default Aversion Fees (DAF) (Net of rebates) | 341,954 | 113,985 | 110,685 | 58,263 | 284,927 | 191,862 | 77,877 |
| 4 | ICSAC Share Default Collections | 5,455,188 | 1,818,396 | 375,820 | 690,997 | 2,033,189 | 1,747,829 | (70,567) |
| 5 | Direct Loans Cons. (Net of 8.5% back to Fed Gov) | 2,576,750 | 858,917 | 220,507 | 172,775 | 985,758 | 922,167 | 63,250 |
| 6 | Iowa Access Grants Funds | - | - | 29,069 | - | 56,415 | - | - |
| 7 | Interest on Operating Fund | 75,000 | 25,000 | 9,584 | 5,703 | 17,093 | 12,154 | (12,846) |
| 8 | Other Revenue (includes TOP) | 870,000 | 290,000 | 18,358 | 1,547 | 63,000 | 77,559 | (212,441) |
| 9 | Est PLP Rev | 500,000 | 166,667 | 97,270 | 19,575 | 290,259 | 90,439 | (76,228) |
| 10 | Intra-Agency Reimbursements | 1,670,272 | 556,757 | - | 462,058 | - | 462,058 | (94,699) |
| 11 | Grant DrawDown from USDE | 4,300,000 | 1,433,333 | 2,042,191 | 737,779 | 2,281,229 | 739,969 | (693,364) |
| 12 | State Appropriation | - | - | - | - | - | - | - |
| Total Revenues/Resources | | \$ 17,340,366 | \$ 5,650,856 | \$ 2,903,484 | \$ 2,148,697 | \$ 6,011,870 | \$ 4,244,037 | \$ (1,406,819) |
| Expenditures: | | | | | | | | |
| 13 | Agency Administration | 1,386,300 | 462,099 | 543,388 | 97,709 | 1,760,663 | 378,869 | (83,230) |
| 14 | Marketing Administration | 283,972 | 94,658 | - | 46,940 | - | 83,189 | (11,469) |
| Total Administrative | | \$ 1,670,272 | \$ 556,757 | \$ 543,388 | \$ 144,649 | \$ 1,760,663 | \$ 462,058 | \$ (94,699) |
| 15 | Collection Expense | 6,050,102 | 2,016,701 | 249,980 | 255,570 | 1,518,299 | 1,390,201 | (626,500) |
| 16 | FFEL Expense | 2,392,458 | 797,346 | 0 | 174,173 | 0 | 611,224 | (186,122) |
| 17 | Collection Expense - PLP | 127,500 | 42,500 | 51,889 | 8,089 | 156,240 | 52,300 | 9,800 |
| Total Collection and FFEL Expenses | | \$ 8,570,060 | \$ 2,856,547 | \$ 301,869 | \$ 437,832 | \$ 1,674,539 | \$ 2,053,725 | \$ (802,822) |
| 18 | Grant Administration | \$ 2,103,146 | \$ 141,049 | \$ - | \$ 9,056 | \$ - | \$ 51,920 | (89,129) |
| 19 | College Access Challenge Grant | 1,500,000 | 500,000 | 13,295 | 19,051 | 631,255 | 770,722 | 270,722 |
| 20 | Gear Up Grant | 2,800,000 | 466,668 | 1,513,181 | 28,773 | 1,739,054 | 222,216 | (244,452) |
| 21 | Financial Literacy | 91,011 | 30,336 | 0 | 4,310 | 0 | 26,122 | (4,214) |
| 22 | IHAPI | 649,697 | 216,565 | 0 | 31,378 | 0 | 178,692 | (37,873) |
| 23 | JR Justice | 0 | 0 | 0 | 0 | 0 | 85,000 | 85,000 |
| Total Fin Literacy, IHAPI and Grant Expenditures | | \$ 7,143,854 | \$ 1,354,618 | \$ 1,526,476 | \$ 92,568 | \$ 2,370,308 | \$ 1,334,672 | \$ (19,946) |
| 24 | Osteopathic and Miscellaneous programs | 0 | 0 | 0 | 0 | 0 | 0 | - |
| 25 | Scholarship and Grants | 687,592 | 229,198 | 0 | 21,567 | 0 | 156,073 | (73,125) |
| 26 | Postsecondary Registration | 175,311 | 58,437 | 0 | 9,620 | 0 | 45,211 | (13,226) |
| Total Misc. (S&G, Postsecondary Reg, Osteo) | | \$ 862,903 | \$ 287,635 | \$ - | \$ 31,187 | \$ - | \$ 201,285 | \$ (86,350) |
| Total Operating Expenses | | 18,247,089 | 5,055,557 | 2,371,733 | 706,236 | 5,805,511 | 4,051,740 | (1,003,817) |
| 27 | Federal Default Fee | 0 | 0 | 0 | 0 | 31,769 | 0 | - |
| Total Federal Default Fee | | \$ - | \$ - | \$ - | \$ - | \$ 31,769 | \$ - | \$ - |
| Total Expenditures | | \$ 18,247,089 | \$ 5,055,557 | \$ 2,371,733 | \$ 706,236 | \$ 5,837,280 | \$ 4,051,740 | \$ (1,003,817) |
| Net Gain(Loss)Operating Fund | | \$ (906,723) | \$ 595,299 | \$ 531,751 | \$ 1,442,461 | \$ 174,589 | \$ 192,297 | \$ (403,002) |

Footnotes:

5 & 9 - Estimated revenue, based on a percentage of receipts.

**IOWA COLLEGE STUDENT AID COMMISSION
FUND 0163 - YEAR TO DATE UNIT DETAIL
SUMMARY OF RESOURCES AND EXPENDITURES
SFY 2012 as of October 31, 2011**

| Operating Fund | UNIT 2001 | UNIT 2002 | UNIT 2004 | UNIT 3003 | UNIT 3004 | UNIT 4001 | UNIT 5002 | UNIT 5003 | UNIT 7001 | UNIT 7002 | UNIT 7003 | UNIT 7007 | UNIT 8008 | UNIT 9009 | YTD ACTUAL | YTD BUDGET | YTD Actual to Budget Variance |
|--|------------------|------------------|----------------|---------------------|--------------------|------------------|--------------------|-------------------|-------------------|-------------------|--------------------|--------------------|-----------------|-------------------|---------------------|---------------------|-------------------------------------|
| Class | ADMIN | MARKETING | MISC | COLLECTIONS | FFEL | JR JUSTICE | S&G | POSTSEC REG | GRANT ADMIN | FIN LIT | IHAPl | CACG | PLP | GEAR UP | TOTAL | TOTAL | |
| Revenues/Resources: | | | | | | | | | | | | | | | | | |
| 1 Federal Account Maintenance Fees (AMF) | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 387,801 | (387,801) |
| 2 Federal Loan Processing Fee (LPIF) | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 3 Default Aversion Fees (DAF) (Net of rebates) | - | - | - | - | 191,862 | - | - | - | - | - | - | - | - | - | 191,862 | 113,985 | 77,877 |
| 4 ICSAC Share Default Collections | - | - | - | 1,747,829 | - | - | - | - | - | - | - | - | - | - | 1,747,829 | 1,818,396 | (70,567) |
| 5 Direct Loans Cons. (Net of 8.5% back to Fed Gov) | - | - | - | 922,167 | - | - | - | - | - | - | - | - | - | - | 922,167 | 858,917 | 63,250 |
| 6 Iowa Access Grants Funds | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 7 Interest on Operating Fund | - | - | - | - | 12,154 | - | - | - | - | - | - | - | - | - | 12,154 | 25,000 | (12,846) |
| 8 Other Revenue (includes TOP) | - | - | 2,073 | 74,457 | - | - | - | - | - | - | - | - | - | 1,029 | 77,559 | 290,000 | (212,441) |
| 9 Est PLP Rev | - | - | - | - | - | - | - | - | - | - | - | - | 90,439 | - | 90,439 | 166,667 | (76,228) |
| 10 Intra-Agency Reimbursements | 378,869 | 83,189 | - | - | - | - | - | - | - | - | - | - | - | - | 462,058 | 556,757 | (94,699) |
| 11 Grant DrawDown from USDE | - | - | - | - | - | 85,000 | - | - | - | - | - | 486,486 | - | 168,483 | 739,969 | 1,433,333 | (693,364) |
| 12 State Appropriation | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Total Revenues/Resources | \$378,869 | \$ 83,189 | \$2,073 | \$ 2,744,453 | \$ 204,016 | \$ 85,000 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 486,486 | \$90,439 | \$ 169,512 | \$ 4,244,037 | \$ 5,650,856 | \$ (1,406,819) |
| Expenditures: | | | | | | | | | | | | | | | | | |
| 13 Personal Services - Loan Administration | 248,556 | - | - | 214,516 | 126,349 | - | 60,239 | 31,834 | 32,978 | 16,719 | 109,196 | 60,910 | - | 48,145 | 949,442 | 1,174,957 | (225,515) |
| 14 Travel | 4,827 | 9,299 | - | 1,025 | 2,145 | - | 1,766 | - | 26 | - | 1,134 | 3,457 | - | 2,393 | 26,072 | 64,087 | (38,015) |
| 15 Office Supplies | 18,696 | 178 | - | 32 | - | - | 1 | - | - | - | 310 | 39 | - | 776 | 20,032 | 13,058 | 6,974 |
| 16 Equipment Repairs | 296 | - | - | 95 | - | - | - | - | - | - | - | - | - | - | 391 | 433 | (42) |
| 17 Printing and Binding | 298 | 48,099 | - | - | 887 | - | 309 | - | - | - | 1,669 | 8,582 | - | - | 59,844 | 49,066 | 10,778 |
| 18 Postage | 2,248 | 9,065 | - | 240 | 9 | - | 860 | - | - | - | 19 | 133 | - | 93 | 12,667 | 11,872 | 795 |
| 19 Communications | 6,012 | 64 | - | 927 | 109 | - | 626 | - | 110 | - | 901 | 784 | - | 946 | 10,479 | 20,126 | (9,647) |
| 20 Rentals | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 21 Professional & Scientific Services | 1,589 | - | - | 3,584 | 3,524 | - | - | - | - | - | - | 2,190 | - | - | 10,887 | 21,901 | (11,014) |
| 22 Outside Services - SLMA | - | - | - | - | 291,033 | - | - | - | - | - | - | - | - | - | 291,033 | 385,486 | (94,453) |
| 23 Outside Services - iLink | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 24 Outside Services - SLCS | - | - | - | - | 126,198 | - | - | - | - | - | - | - | - | - | 126,198 | 165,005 | (38,807) |
| 25 Outside Services - Other | 4,557 | - | - | 1,027,271 | - | - | 298 | - | - | - | 92 | 52,000 | - | - | 1,084,218 | 1,397,338 | (313,120) |
| 26 Intra-State Transfers | 791 | - | - | - | - | - | - | - | - | - | - | - | - | - | 791 | 218,923 | (218,132) |
| 27 Advertising & Publicity | - | 15,129 | - | - | - | - | - | - | - | - | - | 76,362 | - | - | 91,491 | 43,717 | 47,774 |
| 28 Attorney General | 3,750 | - | - | 10,834 | - | - | - | - | - | - | - | - | - | - | 14,584 | 17,200 | (2,616) |
| 29 State Audits | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 9,833 | (9,833) |
| 30 State Reimbursements - Rent | 15,527 | - | - | - | - | - | - | - | - | - | - | - | - | - | 15,527 | 22,176 | (6,649) |
| 31 State Reimbursements - Other | 3,297 | 171 | - | 102 | 409 | - | 172 | 34 | - | - | 68 | 68 | - | 112 | 4,433 | 10,475 | (6,042) |
| 32 ITE Reimbursements | 41,286 | 322 | - | 1,112 | 889 | - | 259 | 83 | - | - | 152 | 133 | - | 189 | 44,425 | 96,891 | (52,466) |
| 33 Intra-Agency Reimbursements | - | - | - | 107,030 | 59,672 | - | 91,345 | 13,260 | 18,806 | 9,403 | 65,151 | 43,658 | - | 53,732 | 462,058 | 556,882 | (94,824) |
| 34 Equipment | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 35 Office Equipment | - | 48 | - | - | - | - | - | - | - | - | - | 399 | - | 792 | 1,239 | - | 1,239 |
| 36 IT Equipment & Software | 26,464 | - | - | - | - | - | 198 | - | - | - | - | 1,507 | 198 | 15,038 | 43,405 | 42,684 | 721 |
| 37 Other Expenses & Obligations | 675 | 814 | - | 75 | - | - | - | - | - | - | - | - | - | - | 1,564 | 8,252 | (6,688) |
| 38 Licenses | - | - | - | - | - | - | - | - | - | - | - | 572,500 | - | 100,000 | 672,500 | 439,860 | 232,640 |
| 39 Other Refunds | - | - | - | 23,358 | - | - | - | - | - | - | - | - | 102 | - | 23,460 | 285,333 | (261,873) |
| 40 State Aid | - | - | - | - | - | 85,000 | - | - | - | - | - | - | - | - | 85,000 | - | 85,000 |
| Total Administrative | \$378,869 | \$ 83,189 | \$ - | \$ 1,390,201 | \$ 611,224 | \$ 85,000 | \$ 156,073 | \$ 45,211 | \$ 51,920 | \$ 26,122 | \$ 178,692 | \$ 770,722 | \$52,300 | \$ 222,216 | \$ 4,051,740 | \$ 5,055,555 | \$ (1,003,815) |
| Total Expenditures | \$378,869 | \$ 83,189 | \$ - | \$ 1,390,201 | \$ 611,224 | \$ 85,000 | \$ 156,073 | \$ 45,211 | \$ 51,920 | \$ 26,122 | \$ 178,692 | \$ 770,722 | \$52,300 | \$ 222,216 | \$ 4,051,740 | \$ 5,055,555 | \$ (1,003,815) |
| Net Gain(Loss)Operating Fund | \$ - | \$ - | \$2,073 | \$ 1,354,252 | \$(407,208) | \$ - | \$(156,073) | \$(45,211) | \$(51,920) | \$(26,122) | \$(178,692) | \$(284,236) | \$38,139 | \$(52,704) | \$ 192,297 | \$ 595,301 | \$ (403,004) |

Footnotes:
5 & 9 - Estimated revenue, based on a percentage of receipts.

**IOWA COLLEGE STUDENT AID COMMISSION
 DEFAULT PREVENTION, FUND #0261
 SUMMARY OF RESOURCES AND EXPENDITURES
 SFY 2012 as of October 31, 2011**

| | FY 2011 Budget | FY 2011 Year to Date Budget | FY 2011 Year to Date Actuals | Variance |
|---|---------------------------|--|---|-----------------------|
| Resources: | | | | |
| Interest | \$ 7,500.00 | \$ 2,500.00 | \$ 1,109.00 | \$ (1,391.00) |
| Refunds & Reimbursements | \$ - | \$ - | \$ 31.00 | \$ 31.00 |
| Total Resources | \$ 7,500.00 | \$ 2,500.00 | \$ 1,140.00 | \$ (1,360.00) |
| Expenditures: | | | | |
| Travel/State Vehicle | \$ - | \$ - | \$ - | \$ - |
| Office Supplies | \$ - | \$ - | \$ - | \$ - |
| Printing & Binding | \$ - | \$ - | \$ - | \$ - |
| Professional & Scientific Services | \$ - | \$ - | \$ - | \$ - |
| Outside Services | \$ - | \$ - | \$ - | \$ - |
| Advertising & Publicity | \$ - | \$ - | \$ - | \$ - |
| ITD Reimbursement | \$ - | \$ - | \$ - | \$ - |
| Licenses | \$ 150,000.00 | \$ 150,000.00 | \$ 135,000.00 | \$ (15,000.00) |
| Aid to Individuals | \$ - | \$ - | \$ - | \$ - |
| Total Expenditures | \$ 150,000.00 | \$ 150,000.00 | \$ 135,000.00 | \$ (15,000.00) |
| Net Gain(Loss) | \$ (142,500.00) | \$ (147,500.00) | \$ (133,860.00) | \$ 13,640.00 |
| Default Prevention Cash Balance 6/30/11 | \$1,719,606.61 | | | |
| Net Gain/(Loss) SFY 2012 10/31/2011 | \$ (133,860.00) | | | |
| Cash Balance 10/31/2011 | \$1,585,746.61 | | | |

IOWA COLLEGE STUDENT AID COMMISSION
SCHOLARSHIP & GRANT ADMINISTRATION
SUMMARY OF EXPENDITURES
SFY 2012 as of October 31, 2011

State Appropriated - \$232,943

| | FY 2011 | FY 2012 | FY 2012 | FY 2012 | Variance |
|---------------------------------|-------------------|-------------------|------------------|------------------|--------------------|
| | Actual | Budget | Year to Date | Year to Date | Over |
| | | | Budget | Actual | (Under) |
| Expenditures: | | | | | |
| 1 Salaries | \$ 219,455 | \$ 232,510 | 77,503 | \$ 65,536 | \$ (11,967) |
| 2 Travel | 335 | 433 | 144 | \$ - | \$ (144) |
| 3 Office Supplies | 1,445 | - | - | \$ - | \$ - |
| 4 Equipment Repairs | 52 | - | - | \$ - | \$ - |
| 5 Printing | 2,058 | - | - | \$ - | \$ - |
| 6 Postage | 3,672 | - | - | \$ - | \$ - |
| 7 Communications | 2,381 | - | - | \$ - | \$ - |
| 8 Rental | 5,588 | - | - | \$ - | \$ - |
| 9 Professional Services | 60 | - | - | \$ - | \$ - |
| 10 Outside Services | 3,653 | - | - | \$ - | \$ - |
| 11 State Transfers | 75 | - | - | \$ - | \$ - |
| 12 State Reimbursements - Rent | 3,479 | - | - | \$ - | \$ - |
| 13 State Reimbursements | 1,469 | - | - | \$ - | \$ - |
| 14 ITD Reimbursements | 6,165 | - | - | \$ - | \$ - |
| 15 Office Equipment | - | - | - | \$ - | \$ - |
| 16 IT Equipment & Software | - | - | - | \$ - | \$ - |
| 17 Other Expenses & Obligations | 9 | - | - | \$ - | \$ - |
| Total Expenditures | \$ 249,896 | \$ 232,943 | \$ 77,648 | \$ 65,536 | \$ (12,112) |

Notes:

FY2012 Budget covers as many salary and benefit costs as possible, with remainder to travel. FY2011 budget was done with a different assumption.

Non Appropriated (Covered by GSL)

| | FY 2011 | FY 2012 | FY 2012 | FY 2012 | Variance |
|---------------------------------|-------------|-------------------|-------------------|-------------------|--------------------|
| | Actual | Budget | Year to Date | Year to Date | Over |
| | | | Budget | Actual | (Under) |
| Expenditures: | | | | | |
| 1 Salaries | \$ - | \$ 351,674 | 117,225 | \$ 60,239 | \$ (56,986) |
| 2 Travel | - | 2,275 | 758 | \$ 1,766 | \$ 1,008 |
| 3 Office Supplies | - | - | - | \$ 1 | \$ 1 |
| 4 Equipment Repairs | - | - | - | \$ - | \$ - |
| 5 Printing | - | - | - | \$ 309 | \$ 309 |
| 6 Postage | - | - | - | \$ 860 | \$ 860 |
| 7 Communications | - | 2,774 | 925 | \$ 626 | \$ (299) |
| 8 Rental | - | - | - | \$ - | \$ - |
| 9 Outside Services | - | - | - | \$ 298 | \$ 298 |
| 10 State Transfers | - | - | - | \$ - | \$ - |
| 11 State Reimbursements - Rent | - | - | - | \$ - | \$ - |
| 12 State Reimbursements | - | 1,820 | 607 | \$ 172 | \$ (435) |
| 13 ITD Reimbursements | - | 1,425 | 475 | \$ 259 | \$ (216) |
| 14 Intra-Agency Reimbursements | - | \$ 327,624 | 109,208 | \$ 91,345 | \$ (17,863) |
| 15 Office Equipment | - | - | - | \$ - | \$ - |
| 16 IT Equipment & Software | - | - | - | \$ 198 | \$ 198 |
| 17 Other Expenses & Obligations | - | - | - | \$ - | \$ - |
| Total Expenditures | \$ - | \$ 687,592 | \$ 229,197 | \$ 156,073 | \$ (73,124) |

Notes:

14 - Intra-Agency reimbursements reflects the charges for Administration and Marketing for ICSAC. Charges are allocated based on budgeted FTE count.

Total Expenditures (Appropriated + NonAppropriated)

| | FY 2011 | | FY 2012 | | Variance Over (Under) |
|---------------------------------|-------------------|-------------------|------------------------|------------------------|-----------------------------|
| | FY 2011 | FY 2012 | FY 2012 | FY 2012 | |
| | Actual | Budget | Year to Date Budget | Year to Date Actual | |
| Expenditures: | | | | | |
| 1 Salaries | \$ 219,455 | \$ 584,184 | \$ 194,728 | \$ 125,775 | \$ (68,953) |
| 2 Travel | \$ 335 | \$ 2,708 | \$ 903 | \$ 1,766 | \$ 863 |
| 3 Office Supplies | \$ 1,445 | \$ - | \$ - | \$ 1 | \$ 1 |
| 4 Equipment Repairs | \$ 52 | \$ - | \$ - | \$ - | \$ - |
| 5 Printing | \$ 2,058 | \$ - | \$ - | \$ 309 | \$ 309 |
| 6 Postage | \$ 3,672 | \$ - | \$ - | \$ 860 | \$ 860 |
| 7 Communications | \$ 2,381 | \$ 2,774 | \$ 925 | \$ 626 | \$ (299) |
| 8 Rental | \$ 5,588 | \$ - | \$ - | \$ - | \$ - |
| 9 Outside Services | \$ 60 | \$ - | \$ - | \$ 298 | \$ 298 |
| 10 State Transfers | \$ 3,653 | \$ - | \$ - | \$ - | \$ - |
| 11 State Reimbursements - Rent | \$ 75 | \$ - | \$ - | \$ - | \$ - |
| 12 State Reimbursements - Other | \$ 3,479 | \$ 1,820 | \$ 607 | \$ 172 | \$ (435) |
| 13 ITD Reimbursements | \$ 1,469 | \$ 1,425 | \$ 475 | \$ 259 | \$ (216) |
| 14 Intra-Agency Reimbursements | \$ 6,165 | \$ 327,624 | \$ 109,208 | \$ 91,345 | \$ (17,863) |
| 15 Office Equipment | \$ - | \$ - | \$ - | \$ - | \$ - |
| 16 IT Equipment & Software | \$ - | \$ - | \$ - | \$ 198 | \$ 198 |
| 17 Other Expenses & Obligations | \$ 9 | \$ - | \$ - | \$ - | \$ - |
| Total Expenditures | \$ 249,896 | \$ 920,535 | \$ 306,845 | \$ 221,609 | \$ (85,236) |



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