

IOWA COLLEGE STUDENT AID COMMISSION

Strayer University Application for Postsecondary Registration March 22, 2017

STAFF ACTION: *Approve Strayer University for an initial, two-year registration term that begins on March 22, 2017 through March 22, 2019.*

Registration Purpose

Strayer University (the University) is approved by the District of Columbia to offer distance education programs to Iowa residents under the Commission-approved interstate reciprocity agreement also known as SARA. Thus, the Commission does not require the University to register for distance education, provided the University's programs and associated activities align with SARA policies that limit a SARA school's presence in a State. However, the University is considering establishing an instructional site in Iowa and wishes to voluntarily register in Iowa at this time in preparation for that possibility.

Conditions for Establishing a Physical Location in Iowa

Before the University initiates operation at a physical location in Iowa, the University must provide the following additional information and documentation:

- Documentation of its accrediting agency's approval to operate from a physical location in Iowa, or documentation substantiating that its accrediting agency's approval is not required;
- If applicable, a list of programs to be offered at an Iowa instructional site, and the total estimated costs of those programs;
- If the University will offer programs at an Iowa instructional site, a curriculum vitae summary for all persons the University will compensate to provide instruction at that site;
- The identity and business contact information for at least one *full-time* Iowa faculty member, program coordinator, or student services coordinator who is devoted to Iowa students.
- The address of the location(s) at which the University will operate in Iowa, and a copy of a current lease or purchase agreement;

Institutional Information

Strayer University is a for-profit institution whose principal office is located at 1133 15th Street, N.W., Suite 200, Washington, D.C. 20005. The University maintains additional locations in the states of Alabama, Arkansas, Delaware, the District of Columbia, Florida, Georgia, Maryland, Mississippi, New Jersey, North Carolina, Pennsylvania, South Carolina, Tennessee, Texas, Virginia, and West Virginia. The chief executive officer of Strayer University is Brian Jones, 1133 15th St., NW, Suite 300, Washington DC 20005. The University maintains an active Certificate of Authorization with the the Iowa Secretary of State's office under foreign limited liability company #501765. The Iowa registered agent is CT Corporation System, 400 East Court Avenue, Des Moines, IA 50309.

Current Ownership and Governance: Strayer University is a wholly owned subsidiary of the for-profit education services corporation Strayer Education, Inc., a publicly traded corporation.

Strayer Education, Inc., maintains a Board of Directors that include the following individuals:

- Robert S. Silberman, Executive Chairman: Mr. Silberman is a member of the Council on Foreign Relations and the Advisory Council of the Johns Hopkins University School of Advanced International Studies. Formerly, Mr. Silberman was CEO of Strayer Education from 2001 to 2013; President and CEO of CalEnergy Company; and United States Assistant Secretary of the Army.
- Charlotte F. Beason, Ed.D, member: Dr. Beason is a consultant in education and health care administration. Previously, she was the Executive Director of the Kentucky Board of Nursing; the Chair of the Commission on Collegiate Nursing Education; and served the Department of Veterans Affairs as the Director of the Health Professions Education Service and the Program Director for the Office of Nursing Services.
- William E. Brock; member Mr. Brock is the Founder and Chairman of Brock Offices. He is a former U.S. Secretary of Labor, U.S. Special Trade Representative; and U.S. Senator from the State of Tennessee.
- John T. Casteen, III, Ph.D., member: Dr. Casteen is the President Emeritus of the University of Virginia. Previously, he was the President of the University of Connecticut, and Secretary of Education for the Commonwealth of Virginia.
- Nate Fick, member: Mr. Fick is the CEO of Endgame, an Operating Partner at Bessemer Venture Partners and a Trustee of Dartmouth College. Previously he served as the CEO of the Center for a New American Security and as a Captain in the United States Marine Corps.
- Robert R. Grusky, member. Mr. Grusky is the Founder and Managing Member of Hope Capital Management, LLC, and a Principal at New Mountain Capital, LLC. Previously, he served as President of RSL Investments Corporation and Vice President at Goldman Sachs & Co.
- Karl McDonnell, Chief Executive Officer. Mr. McDonnell is the former COO of InteliStaf Healthcare, Inc. He also previously served as Vice President of the Investment Banking Division at Goldman, Sachs & Co.
- Todd A. Milano, member: Mr. Milano is the President Emeritus of Central Penn College. He is a current Trustee for Strayer University and has served in that capacity since 1992.
- G. Thomas Waite, III, member: Mr. Waite is the Treasurer and CFO of the Human Society of the United States.
- J. David Wargo, member: Mr. Wargo is President of Wargo & Company, Inc., Co-Founder of New Mountain Capital, LLC, and the former Managing Director of The Putnam Companies.

Strayer University's Board of Trustees includes the following individuals. Legal control of the University is vested in the Board of Trustees, who, according to the University Directory provided as an addendum to the registration application, are elected by the University's publicly traded parent company Strayer Education, Inc.:

- Charlotte F. Beason, E.D., Chairman of the Board (see above).
- Mark Brown, MBA, Vice Chairman of the Board: Mr. Brown is the former Strayer University Executive Vice President and CFO. Previously, he was the CFO of Kantar Group and a Director of Corporate Planning for PensiCo., Inc.
- Todd A. Milano, member (see above).
- William C. Reha, M.D., MBA, member: Dr. Reha is a Board Certified Urologic Surgeon, current President of the Medical Society of Virginia, and a Fellow of the Claude Moore Physician Leadership Institute. He is the 2005 winner of the Strayer University Outstanding Alumni Award.

- Dr. Carol Shapiro, M.D., member: Dr. Shapiro is a practicing plastic surgeon, Medical Director of the Wound Healing Center of Sentara Northern Virginia Medical Center, and a member of the Board of Trustees of Sentara Northern Virginia Medical Center. Previously, she served as President of the medical staff of the two hospitals in the county in which she practices. Dr. Shapiro has also served as President of the Prince William County Medical Society, President of the Medical Society of Virginia, President of the National Capital Society of Plastic Surgeons, and as a member of Board of Trustees of Prince William Hospital and Potomac Hospital.
- Peter D. Salins, Ph.D., member: Dr. Salins is currently a Professor of Political Science at the State University of New York (SUNY) and Director of its graduate program in public policy. Previously, Dr. Salins served as Provost and Vice Chancellor for Academy Affairs at SUNY from 1997 to 2006. Dr. Salins is a Fellow of the American Institute of Certified Planners and a Director of the Citizens Housing and Planning Council of New York.
- Jonathan Gueverra, Ed.D., member: Dr. Gueverra is the current President and CEO of Florida Keys Community College. Previously, he was the CEO of the Community College of the District of Columbia.
- J. Chris Toe, Ph.D, member: Dr. Toe is the Executive Chairman of Agrifore Advisory & Investment Services, Incorporate in Liberia, and acts as a Consultant for the World Food Programme, the Food and Agriculture Organization, the African Development Bank, and the World Bank. Previously Dr. Toe served as President of Strayer University from 2003 to April 2006, and as a Minister of Agriculture of the Republic of Liberia from 2006 to 2009.

Physical Facilities: None at this time.

Accreditation: Strayer University is accredited by the Middle States Commission on Higher Education, a regional accrediting agency recognized by the federal Department of Education.

Federal Stafford Loan Cohort Default Rate (FFY 2013): 11.3%. For comparison purposes, the FFY 2013 national average cohort default rate is 11.3%.

Graduation Rate: The graduation rate is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion, as reported to the federal Department of Education. Strayer University was not required to report a graduation rate for its Global Region campus, which includes the University's online program students, since 1 percent of entering students were counted as full-time, first-time for the reporting period.

Average Loan Debt upon Graduation: As required by the federal Department of Education, Strayer University calculates *median* loan debt of its graduates by program. In cases when there are fewer than 10 graduates in any program, the University is not required to calculate or disclose a median debt figure for that program:

	Degree Program Name	Median Loan Debt
1	Diploma in Acquisition and Contract Management	There were fewer than 10 graduates in this program.

2	Associate in Arts in Accounting	\$30,257
3	Associate in Arts in Acquisition and Contract Management	\$10,420
4	Associate in Arts in Business Administration	\$20,783
5	Associate in Arts in Marketing	There were fewer than 10 graduates in this program.
6	Bachelor of Science in Accounting	\$39,946 (new program)
7	Bachelor of Business Administration	\$33,000
8	Master of Science in Accounting	\$60,873
9	Master of Business Administration	\$60,864
10	Master of Science in Health Services Administration	\$76,180
11	Master of Science in Human Resource Management	\$67,313
12	Master of Science in Management	\$59,623
13	Associate in Arts in Information Systems	\$23,066
14	Associate in Arts in Information Technology	There were fewer than 10 graduates in this program.
15	Bachelor of Science in Information Systems	\$26,157
16	Bachelor of Science in Information Technology	\$14,886

17	Master of Science in Information Systems	\$40,568
18	Master of Science in Information Assurance	There were fewer than 10 graduates in this program.
19	Bachelor of Science in Criminal Justice	\$31,696
20	Master of Education	\$76,180
21	Master of Public Administration	\$76,169
22	Executive Master of Business Administration	\$14,151
23	Bachelor of Science in Nursing	There were fewer than 10 graduates in this program. Median amounts are withheld to preserve the confidentiality of graduates.

The University provides these disclosures to the public on its Program Disclosure webpage at <http://www.strayer.edu/academic-program-disclosure>.

Record Preservation: Strayer University maintains a records management policy which requires that different types of Records (as defined on p.2) be retained, for specified periods of time consistent with business and legal requirements, including privacy laws and the Sarbanes-Oxley Act of 2002. Under this Policy, records may not be knowingly altered, concealed, or falsified, nor may they be destroyed prior to the specified retention period. Any University employee who is found to have violated this policy shall be subject to discipline up to and including dismissal.

Retention periods may increase by government regulation, pending litigation or audit requirements, or other events. Any record that is subject to litigation or pertaining to a claim, audit, agency charge, investigation, or enforcement action should be kept until final resolution of the action. Record destruction may be delayed for any of the above reasons if directed by the President, Office of General Counsel, the Chief Financial Officer, or Controller. The Chief Technology Officer may be required to have access to, or take control of, electronic equipment to ensure that Records requested in connection with litigation, or pertaining to a claim, audit, agency charge, investigation or enforcement action are properly retained.

Departments that maintain University records are responsible for establishing appropriate record retention practices. Each University Department shall have a Records Management Coordinator, designated by a Department Head, who is responsible for establishing appropriate records management practices, as follows:

- Implement the Department's record management practices.
- Ensure that these practices are consistent with the University's Records Management Policy.
- Educate staff within the department in understanding sound record management practices.
- Ensure that access to confidential records and information is restricted.

- Destroy inactive records that have no value upon passage of the applicable retention period and maintain a log of destroyed documents.
- Ensure that records are destroyed in a manner that is appropriate for the type of Records and information involved.
- Serve as a liaison with other Records Management Coordinators to ensure compliance.
- Report to the Department Head about compliance with this policy.

Many records subject to record retention requirements contain confidential information (such as confidential business records and non-public student or employee information including, but not limited to, name, address, social security number, bank account numbers, financial or financial aid information, student identification numbers, academic records, medical information, etc.). Such records are private, may be protected by the Family Educational Rights and Privacy Act (FERPA), the Gramm-Leach-Bliley (GLB) Act, and/or the Health Insurance Portability and Accountability Act (HIPAA), and must be maintained consistent with Strayer's confidentiality policies. Confidential records must be stored in a secure location, such as in a locked filing cabinet.

Student transcripts and grade records are maintained indefinitely. Generally, other records for students who enroll are maintained for five years after graduation or, for a student who does not graduate, the student's last date of attendance.

Strayer University also maintains a data backup policy that outlines the responsibilities of Information Technology staff to back up, test, and audit servers. The policy also outlines the responsibility of other personnel to back up personal and business-related data.

Transcript Requests: Students and alumni who attended the University since the Winter 2011 term may request an official Strayer University transcript by completing an Official Transcript Request through the iCampus portal. Students must designate the address to which the transcript should be mailed. Strayer does not send official transcripts electronically.

Students are charged \$10 per transcript. Fees for the total number of transcripts must be paid at the time of request submission or the request will not be processed. Payment may be made by check, money order, credit card, or debit card.

Students and alumni who have not attended the University at any time since the Winter 2011 term, or students who want to pay their transcript fee by cash, check or money order, may request an official transcript by completing an Official Transcript Request form at http://www.strayer.edu/sites/default/files/official_transcript_request_0.pdf. The completed form can be mailed to any campus Business Office.

Additional information about requesting transcripts is available on the University's Transcript Request webpage at <http://www.strayer.edu/strayer-university-alumni/strayer-university-transcript-request>.

Instructional Methodology: At this time, Strayer University delivers instruction to Iowa students exclusively via distance education. Instruction is delivered through a combination of asynchronous and synchronous formats. Students have access to course materials 24/7 through iCampus, the University's proprietary online learning portal. Blackboard is the University's online course platform. Students access the Blackboard course shell through the iCampus student portal using a single user ID and password. Access control to courses within the Blackboard platform is based on

student course registration. iCampus and the Blackboard systems also provide software tutorials and links to various University student services.

Online synchronous courses are presented using the Blackboard Collaborate software for the live class sessions, integrated with the Blackboard educational software as a supporting course webpage and communication platform. The courses are conducted in weekly “live” class sessions in a quarter/term format. Blackboard Collaborate provides the instructor an online presentation platform with real-time 2-way audio/video communication, graphics (prepared and free-hand formats), and a text chat capability. Additionally, the instructor can import web pages and images of computer applications, or share applications on a personal computer (PC) desktop to add interactive content to the live class session. Blackboard Collaborate provides a compartmentalized class screen on the student’s PC desktop with a graphics display and whiteboard area, chat box, participant lists, and survey response tabs to respond to instructors. Courses are organized into a lobby screen that opens to the live event sessions, at the scheduled times, and also provides a listing of archived classes the student can review. Each “live” session is archived and captures the audio, chat, and all graphics or webpages used during that session. Blackboard Collaborate archives and the associated Blackboard course shell for the course are available at any time during the term.

The majority of the online asynchronous courses are being conducted using the Blackboard software as the educational portal to provide course content to the student, communication links with the instructor, and an administrative conduit between the student and faculty. Each course has a separate Blackboard web page divided into an administrative section and 11 weekly units of instruction. The instructional designers, along with faculty subject matter experts (SMEs), develop customized, prerecorded lectures and course instruction files that are integrated with text and graphic files to create the learning environment for the students. The weekly instructional units on the Blackboard course webpage are structured to provide learning events for the students, including:

- Information displays/content (text, graphics, audio files, audio/slide presentations, and external links);
- Student readings/assignments/exercises;
- Assessment events (exercises, exams, quizzes, projects, research papers, case analysis);
- Chat and threaded-discussion events; and
- Integration of publisher-supported materials, such as CD-based videos and graphics content, or exercises on a text-specific web page.

The Blackboard course web page provides course content files (syllabus, course outlines, various course instruction files), various communication tools (course announcements, email utility, chat rooms, discussion boards, file transfer utility to the instructor), and links to course specific reference materials. Students communicate with the instructor by email or in designated discussion threads in the course. Group discussions are typically conducted through threaded discussions.

Technical support staff is available 24/7 to assist students and faculty.

At this time, the only on-ground instructional component of any University program occurs in the RN to BSN program, in which students are required to complete a preceptorship in three nursing courses. This experience allows the student the opportunity to work alongside an RN who has a formal leadership role at a health care facility in the student’s local area. See below, under Online

Programs Offered in Iowa, for more information about the requisite field experiences in the RN to BSN program.

Student Learning Resources: All of the student academic and other support services are accessible behind the University's proprietary online student portal, iCampus.

Strayer University's main Library, the Wilkes Library, is located at Strayer's flagship campus in Washington, D.C. The Library provides electronic and interlibrary loan access to students at all campuses. All campuses have their own staffed learning resource center (LRC) as part of a larger, University-wide LRC system.

Strayer University has had a strategic Library plan in place since the mid-1980s. The Library Development Plan 2010-2015 was developed by the Office of the University Librarian and the Library and Information Literacy Advisory Committee (LILAC), a standing committee comprised of the academic Discipline Advisors or Deans, at-large faculty, and student and administrative representatives. The LILAC has already met and has several other meetings scheduled throughout the 2016 calendar in an effort to have a revised set of plans for the 2016-2020 period.

The Library mission is to provide accessible resources and services that enhance the achievement of learning outcomes for adult learners in all programs, by fostering the development of information literacy skills and competencies, and by managing these resources and services in compliance with standard University, regulatory, and professional standards.

The Library serves students, faculty, and staff in both an on-campus and online environment. The collection emphasizes accounting, business administration, and computer information systems, although materials are collected to support all programs, general electives, and individual growth. Combined library holdings include a physical collection of approximately 117,984 items, online subscription-based access to more than 180,000 periodicals, newspapers, and journals, and more than 75,000 e-books. The Library acquires book resources on a monthly basis with input from LRC Managers, faculty and program administrators. Circulating books are added to individual campus collections but are available for use by any student or faculty through the use of the library's online catalog and the intercampus delivery system. Students may request to have library materials mailed to their homes from the library's physical collections. Strayer University also has an agreement with the University of Michigan library that permits Strayer University students to borrow from the Michigan Information Transfer Source, a collection of approximately 4 million books.

The Library works with the University's academic leaders to acquire materials in support of new programs. The University has recently acquired nursing and healthcare related databases in support of a new nursing program including CINAHL Complete, The Cochrane Library, MedLine Complete, and ProQuest Nursing and Allied Health Source.

Below is a list of other resources available to Strayer University students. Selections denoted with an asterisk (*) were recently added to support the new RN to BSN program:

- iCampus: iCampus is a centralized online portal where students can access announcements, the University's online learning management system Blackboard, and other University resources.
- New Student Orientation: Three orientation sessions are offered to students: (1) virtual, asynchronous University new student orientation; (2) an orientation to the online learning environment, and (3) RN to BSN program-specific orientation.

- Community Room: This is an online resource for connecting students across disciplines with others who share similar interests and goals.
- Shadow Health*: Shadow Health is a computerized, simulated patient platform used to engage students in applying baccalaureate-level critical thinking, clinical reasoning, and therapeutic communication skills to care for diverse patients in a simulated setting.
- IT Help Desk: Assistance is available via telephone 24/7 for Blackboard, computer, or technical issues.
- School of Nursing Community Page*: This is a Blackboard site housing Microsoft Office tools; APA formatting assistance; program documents, forms, and announcements; scholarship information; the Dean's Blog; and current events in nursing and healthcare.
- Certified Background*: This online platform manages student background checks, drug screening, and immunization acquisition and maintenance. Students access their information via their student portal and receive alerts and notification regarding requirements.
- Clinical Coordination*: This unit supports the clinical program component of the RN to BSN program and serves as the liaison among students, faculty, preceptors, and healthcare facilities. Clinical Coordination supervises and assists students with identifying clinical sites and communicates with preceptors and faculty regarding students' participation in clinical experience activities.

Tutoring is available at no cost to on-campus students and to online students through the online student portal, iCampus. Trained tutors assist students with assessing specific needs, developing a plan of action for academic improvement and specific skill development, and preparing assignments for courses within the student's academic discipline. Tutoring is available in subject areas such as English, mathematics, accounting, computer information systems, and nursing. The University has partnered with Tutor.com to provide academic support in general education courses. Supplemental Instruction for specific courses may also be provided. Tutoring and Supplemental Instruction services are provided by experts with a strong background in the subject area in which they are tutoring. Online tutoring is available for students through the iCampus homepage.

Strayer University offers a free referral program to all students called Student Outreach and Assistance Resources (SOAR). SOAR will work with students regarding any concern or problem affecting a student's behavioral health, well-being or academic performance. Professional counselors are available for a variety of personal or school-related issues, including but not limited to managing stress, financial difficulties, family and personal conflicts; legal issues; substance abuse; depression and anxiety; loss and grief issues; childcare and eldercare. If a student needs additional help, SOAR may refer the student to school, community, or additional resources. Students may call toll-free, text, or submit an online request for assistance. For urgent after-hours help, the SOAR helpline is available 24 hours per day, 365 days per year. More information can be obtained on the SOAR website at <http://strayer.acisoar.com/#>.

Career resources and services are available online and on campus. Students can access online career resources through the University Career Center website on the iCampus portal. Resources include an online job board; on demand and live career webinars; an interactive mock interviewing tool; job search recommendations; support information and software to build resumes, cover letters, and portfolios. On campus career resources can include books, periodicals, and local job listings. Individual career assistance is provided in the Learning Resources Center (LRC) and includes resume assistance, job search suggestions, and demonstration of online career resources. Career networking events and employer recruitment information can be obtained in the LRC as well.

Curriculum Evaluation and Development: The University's Office of Institutional Research, Assessment, and Evaluation maintains Academic Program Review (APR) guidelines that ensure programs are regularly and systemically assessed and the results of the assessment are used to improve program quality. The review is evaluative, directed toward improvement, and must result in specific recommendations. Depending on the program, all academic programs offered by Strayer University are reviewed on a three-year or a five-year cycle developed by the Provost and Chief Academic Officer in consultation with the Deans of the various University schools. Once a program begins review, the process should take about two quarters to complete.

Each University School Dean is responsible for carrying out the reviews of programs within the school. The School Dean is responsible for appointing APR Committee members for that School. An APR Committee is composed of the following:

- School Dean
- Department Chair
- Two faculty members from the program
- One faculty member outside the program
- One Advisory Committee member
- Senior Vice Provost of Academic Programs.

Some of the key questions addressed during the review process include:

- What is the mission of the program?
- How does the mission of the program align with institutional priorities?
- What qualitative/quantitative evidence is there to demonstrate that the program meets the minimum productivity standards?
- How does the program demonstrate that the faculty are trained, current in their field, and teaching effectively?
- What evidence is there to show that the program curriculum supports the mission of the institution and is clearly defined and coherent?
- What measures are used to ensure whether or not students are learning the objectives of the program's curriculum? How are learning outcomes assessment results used to improve the quality of the program?
- Are resources adequate for the program to fulfill its mission?

The APR Committee for each School submits a final report that addresses these key areas of inquiry for each program. The final report includes, at minimum, the following:

- The program profile
- The program's relationship to the University's mission
- Program outcomes and a description of how the program outcomes contribute to the University's mission
- Instructional effectiveness or, as applicable, weakness, in both core program coursework and general education courses
- Enrollment and graduate data that identifies increases or decreases in enrollment and graduation, and discusses factors that may have impacted changes
- Faculty, including full- or part-time; faculty with terminal degrees; percentage of courses taught by part-time faculty during the year; the full- to part-time faculty ratio; and a projection of faculty need in the next five years
- Learning outcomes at program and course level

- Teaching quality, including techniques used to deliver instruction; instructional technologies used and their effectiveness; and how faculty communicate with students
- Student services including advising and career support
- Information technology resources
- Library resources – strengths and weaknesses
- Program future – immediate and long-term challenges; opportunities for growth.

Student Complaints Process: Strayer University's student problem resolution process includes problem solving at the campus, regional, and University level through the Office of Student Affairs. The University's goal is to conduct a timely and thorough review of all problems students bring forward for resolution. In all instances, students must present their concerns in writing with as much specificity as possible at each level of the appeal process, as follows.

Level 1 – Since grievances should be raised and settled promptly, a student should raise the issue with the appropriate University official as soon as the event occurs or the student gains knowledge of it and in no event more than 60 days after the event occurred. An online student has the option to initiate informal redress by contacting his or her assigned Success Coach, who will work to resolve the student's grievance or refer it, as appropriate, to the Office of Student Affairs or Student Financial Services.

If a complaint cannot be resolved informally, the student may file a written grievance following a written response from the Strayer University administrative official. The written grievance must contain the name of the complainant, the date of the filing, and a brief specific description of the grievance and the student's desired resolution. For an online student with a non-financial complaint, the student may file the grievance with the Office of Student Affairs at (877) 261-6908 or studentaffairs@strayer.edu. Students with financially-based complaints should contact the centralized Student Financial Services team at (855) 392-6625. The student should expect to receive a written response within 30 calendar days of the University's receipt of the student's grievance.

Level 2 — If not satisfied with the grievance disposition at Level 1, and within 30 calendar days of the student's receipt of a dissatisfactory response, the student may file a written grievance with the Regional Vice President. The written grievance shall contain the name of the complainant, the date of the filing, a brief, specific description of the grievance and the redress sought, and the results of the disposition of the grievance at Level 1. The Regional Vice President will contact the student upon receipt of the written grievance and will issue a written response within thirty (30) calendar days of receipt.

Level 3 — If not satisfied with the grievance disposition at Level 2, the student may submit a written request to the Senior Vice Provost, Student Affairs, within thirty (30) calendar days of receipt of the written decision from the Regional Vice President. The written grievance shall contain the name of the complainant, the date of the filing, a brief, specific description of the grievance and the redress sought, and the results of the disposition of the grievance at Level 2. Contact information for the Office of Student Affairs can be found in the Student Handbook. Personnel who review the appeal at this level include the Senior Vice Provost, Student Affairs, and any additional person the Senior Vice Provost deems relevant to the appeal, for example, senior financial personnel of the Registrar's Office. Appropriate senior level personnel will reply in writing typically within the thirty (30) calendar days after receipt of the written request. The decision of the Senior Vice Provost, Student Affairs, will be final.

Concerns about the academic quality of courses taught by the members of the University's faculty should be filed with the Help Center, which is accessible through the online student portal iCampus, within 30 calendar days after the end of the course in which the complaint arose. After this 30-day time frame, the University will not evaluate instructor complaints from the student. The student should clearly state the areas of concern, give examples, and provide specific documentation. In conjunction with academic leadership, the Help Center representative will investigate appropriately, including talking with and observing the instructor. Thereafter, the Help Center representative will convey to the student in writing his/her detailed evaluation of the complaint and, if appropriate, a solution to the problem. If the student is dissatisfied with the response received at this level, the student may submit another Help Center ticket at <https://icampus.strayer.edu> which must include the response from the initial Help Center ticket. The ticket will be assigned to the appropriate Regional Associate Dean who will follow the same procedure of evaluation and written response to the student as the Help Center representative. The Regional Associate Dean's decision will be final and no other appeals will be accepted.

Strayer University does not retaliate or take any unfair actions against students who file complaints with the University. In situations where a complaint is not settled to the student's satisfaction, the student may contact the University's accrediting agency, the Middle States Commission on Higher Education, or one of the state agencies listed in the University Catalog. However, students are not required to first file an internal grievance with the University or exhaust the University's complaint and appeal process before filing a complaint with the Middle States Commission on Higher Education or state regulatory agencies.

The University publishes its complaint and grievance processes in the Student Handbook, which is accessible to students through the University's online student portal iCampus, and in the University Catalog at <http://strayer.smartcatalogiq.com/en/2016-2017/Catalog/Policies-and-Procedures/Student-Problem-Resolution>.

Distance Education Programs Offered in Iowa

Strayer University currently offers the following fully online programs to Iowa residents. This list includes estimates of total tuition charges and average fee and book charges over the course of each program. At this time, Strayer University offers no programs from an instructional site located in Iowa.

Undergraduate Diploma Program

- Diploma in Acquisition and Contract Management: \$19,255

Associate Degree Programs

- Associate of Arts in Business Administration: \$32,200
- Associate of Arts in Information Technology: \$32,200
- Associate of Arts in Information Systems: \$32,200
- Associate of Arts in Accounting: \$32,200
- Associate of Arts in Acquisition and Contract Management: \$32,200
- Associate of Arts in Marketing: \$32,200

Baccalaureate Degree Programs

- Bachelor of Science in Nursing (RN to BSN): \$49,200

- Bachelor of Science in Criminal Justice: \$64,250
- Bachelor of Science in Information Technology: \$64,250
- Bachelor of Science in Information Systems: \$64,250
- Bachelor of Science in Accounting: \$64,250
- Bachelor of Business Administration: \$64,250

Masters Degree Programs

- Executive Master of Business Administration: \$40,800
- Master of Public Administration: \$32,130
- Master of Education (non-licensure): \$32,130
- Master of Science in Information Assurance: \$32,130
- Master of Science in Information Systems: \$32,130
- Master of Science in Management: \$32,130
- Master of Science in Human Resource Management: \$32,130
- Master of Science in Health Services Administration: \$32,130
- Master of Business Administration: \$32,130
- Master of Science in Accounting: \$32,130

Field Experiences: The only distance education program the University offers that includes a field experience is the Bachelor of Science in Nursing (RN to BSN). The University provided the program's *Preceptor Manual* for staff's review. A student enrolled in this program must complete three courses, NUR 310, NUR 410, and NUR 499, all of which include field experiences under the supervision of a preceptor at health care facility in the student's local area. For all three courses, the preceptor must have an unencumbered RN license, hold at least a baccalaureate degree in nursing, and have at least two years of post-baccalaureate nursing experience. In NUR310, the preceptor must also be employed in a healthcare facility in a role where he or she is responsible for quality or safety initiatives. For NUR410 and NUR499, the preceptor must have a formal leadership role in a clinical setting, such as nurse manager, director of nursing, assistant director of nursing, or chief nurse executive.

The University executes a contractual agreement with the health care facility at which the RN to BSN student will participate in a field experience. University faculty orient the preceptor to the course expectations and provide supplementary information such as course outlines and written objectives. Faculty also facilitates communication between the preceptor and student in a variety of ways that may include three-way conferencing. Preceptors evaluate the student's performance, which factors into the student's final grade for the course.

Registration Compliance

As required by Iowa Code Section 261B.4, Strayer University disclosed its policies for refunding tuition charges to withdrawn students. The University discloses these policies to current and prospective students in the Catalog at <http://strayer.smartcatalogiq.com/en/2016-2017/Catalog/Financial-Information/Add-Drop-Policy-and-Course-Withdrawal>. Staff note that the University's policy is more generous to withdrawn students than required under Iowa Code Section 714.23.

Administrative rules specifically require the school to comply with the requirements of Chapter 261.9(1) "e" through "h".

- Iowa Code Section 261.9(1)(e) requires a school to maintain and disseminate a drug and alcohol abuse policy that includes sanctions for violation of the school's policy and information about the availability of drug or alcohol counseling or rehabilitation. Iowa Code Section 261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that includes information about counseling opportunities and reporting instances of sexual abuse to school officials and law enforcement. The University maintains these policies and discloses them in a Clery Act security and crime awareness report at <http://www.strayer.edu/sites/default/files/2015-clery-report2016.11.22.pdf> and in online materials available through the online student portal iCampus.
- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy for refunding tuition and mandatory fee charges to 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. The University complies with this provision of Iowa Code and will disclose the policy upon registration approval in the University catalog, in conjunction with the general Iowa tuition refund policy.
- Iowa Code Section 261.9(1)(h) requires a school to develop and implement a policy for employees who, in the course of their employment, attend, examine, counsel, or treat a child and who suspect the physical or sexual abuse of that child. By cross-reference from existing administrative rules for registration [283-21.2(261B), subsection 7], this policy applies to Iowa's registered schools who compensate one or more parties to conduct operational activity on the school's behalf at an Iowa location. This policy does not apply to Strayer University since, at this time, the University compensates no one to conduct operational activity of any kind at an Iowa location.

Student Consumer Information: Iowa Code Section 261B.4(8) requires the disclosure to students of information about the school's programs and courses, a brief description of each course, tuition and fee charges, and whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers. The University provides these disclosures in program pages on its website <http://www.strayer.edu/program-overview> and in the Catalog at the following locations:

- <http://strayer.smartcatalogiq.com/en/2016-2017/Catalog/Financial-Information/Tuition-Charges>
- <http://strayer.smartcatalogiq.com/en/2016-2017/Catalog/Policies-and-Procedures/Dual-Programs>
- <http://strayer.smartcatalogiq.com/en/2016-2017/Catalog/Programs>
- <http://strayer.smartcatalogiq.com/en/2016-2017/Catalog/Courses>

The University affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7. These provisions state that, provided the school does not claim "approval" or "accreditation," the school must disclose to students that it is registered by the Commission and provide Commission contact information for students who have questions or complaints about the school. Upon registration approval, the University will disclose that it is registered by the Commission on its State Licensure and Authorization webpage at <http://www.strayer.edu/state-licensure-and-authorization>. The Commission's contact information also appears in a state agencies contact list on the Student Problem Resolution webpage at <http://strayer.smartcatalogiq.com/en/2016-2017/Catalog/Policies-and-Procedures/Student-Problem-Resolution>.

Financial Responsibility: Strayer University submitted an independent financial audit report by PricewaterhouseCoopers LLP, dated June 26, 2015, for the institutional fiscal year ending December 31, 2014. The auditing firm stated its opinion that the University's financial statements present fairly, in all material respects, the financial position of the University and the results of its operations and cash flows.

- **Financial Responsibility Composite Score:** A private for-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. The most recent composite score for the University that was verified by the federal Department of Education is for the institutional fiscal year ending December 31, 2014 is 3.0.
- **90/10 Ratio:** A private for-profit school that participates in the federal student aid programs must not derive more than 90% of its revenue from federal student aid sources during any institutional fiscal year. The University's most recent 90/10 ratio verified by the federal Department of Education was 73.29% for the institutional fiscal year ending December 31, 2014.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Strayer University initially applied for registration to exclusively offer distance education programs to Iowa residents. Thus, Iowa administrative rules do not require the University to employ a full-time faculty member or program coordinator devoted to Iowa students. In total, Strayer University employs 2365 part-time and 204 full-time faculty members to provide instruction in online programs offered to Iowans.

Instructional/Supervisory Staff Qualifications: Strayer University provided a University Directory that includes the names and educational credentials of approximately 461 full-time faculty that teach at the various Strayer University campuses and in the online programs. All have at least a masters degree; 271, or approximately 58%, have a doctoral degree.

Staff also reviewed available, open faculty positions advertised on the University's Careers website at <https://strayer.wd1.myworkdayjobs.com/careers/>. Approximately 80 open, adjunct faculty positions were available in various academic subject matter areas. In all cases, regardless of the academic subject matter area, the University expects successful adjunct faculty candidates to have teaching experience at the college level; demonstrated knowledge of academic administration, academic technology, and academic evaluation; proficiency in oral presentation and communication skills; strong computer skills; and excellent written communication skills.

- **Accounting** – Of two faculty positions posted, both required either a Ph.D. or DBA in accounting with an active CPA license preferred, or a masters degree in accounting with an active CPA license required.
- **Business** – Of two faculty positions posted, both required an MBA or a masters degree in a business related field.
- **Criminal Justice** – Of three faculty positions posted, both required a masters degree in criminal justice, justice administration, corrections, homeland security or emergency management.
- **Economics** – Of seven faculty positions posted, all required, at minimum, a masters degree in economics or an MBA with a concentration in economics. Four positions required a Ph.D. in Economics or a Doctor of Business Administration degree with a concentration in economics.

- Finance – Of eight faculty positions posted, one required a masters degree in Finance, an MBA with a concentration in Finance, or a masters degree in a business-related field with 18 graduate credits in finance. All other positions required a Ph.D. or DBA in Finance, or a Ph.D. or DBA in a business related field accompanied by a masters degree in finance.
- General Education in English, History, Mathematics, and Science – Of 18 faculty positions posted, all required a masters degree in the field (e.g., history, English, etc.) or a masters degree in a related area with at least 18 semester credit hours or 27 quarter credit hours of graduate course work in the field. Applicants for adjunct faculty positions teaching English had additional masters degree options: English Education, Composition, Communications or Literature. Depending upon the adjunct faculty position the University sought to fill, applicants for science teaching positions had options to hold a masters degree in chemistry, physics, geology, biology, or other life or physical science.
- Information Systems – Of seven faculty positions posted, all required at least a masters degree in information systems, information technology, or a related field. In one case, a terminal degree was required with preference given to candidates with a doctoral degree in computer science, computer engineering software, engineering information technology, or information systems. In some cases, professional certifications were preferred, depending upon the subject matter area that is the focus of the faculty assignment (for example, networks, security, etc.).
- The Jack Welch Management Institute – Of 11 faculty positions posted, all required a terminal degree in a business-related field; 7-10 years of management or leadership experience; and experience teaching in the specific subject matter area that is the focus of the Strayer University faculty position (for example, business analytics, human resources management, leadership, marketing, economics, communications, etc.)
- Legal Studies – Of eight faculty positions posted, six required a Juris Doctorate; two required either a Juris Doctorate or LLM in Law.
- Marketing – Of seven faculty positions posted, all required either a masters degree in marketing, or an MBA or related graduate degree with a concentration in marketing.
- Political Science – Of two faculty positions posted, both required a masters degree in Political Science or International Relations, Government, or Political Theory.
- Psychology – Of three faculty positions posted, all required either a masters degree in psychology, a masters degree in any social science with at least 12 graduate semester hours in psychology, or a masters degree in any field with at least 18 semester or 27 quarter credit hours of graduate course work in psychology.
- Sociology – Of two faculty positions posted, both required a either masters degree in sociology or a masters degree in any area with 18 semester or 27 quarter credit hours of graduate course work in sociology.

Commitment to Iowa Students and Teach-Out: By executing his signature on the application, President Brian W. Jones committed to the delivery of programs the University offers in Iowa and agreed to provide alternatives for student to complete their programs at the same or other

institutions if the University closes a program, or the school closes before students have completed their course of study.

Student Complaints: None.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Strayer University filed satisfactory evidence of financial responsibility under Iowa Code Chapter 714.18. This evidence includes a continuous, corporate surety bond payable to the State of Iowa in the requisite amount of \$50,000, issued by Travelers Casualty and Surety Company of America.

Section 714.23 – State Tuition Refund Policy

Iowa Code Section 714.23 requires Strayer University, as a for-profit institution to offer a student who withdraws from the school's program a minimum refund or reduction of tuition charges. The University maintains a policy that exceeds the minimum tuition refund formula in Iowa Code Section 714.23 for its Iowa-resident online students. This policy is disclosed in the University Catalog at <http://strayer.smartcatalogiq.com/en/2016-2017/Catalog/Financial-Information/Add-Drop-Policy-and-Course-Withdrawal>.