

IOWA COLLEGE STUDENT AID COMMISSION

Mount Carmel College of Nursing Application for Postsecondary Registration in Iowa October 6, 2016

STAFF ACTION: Approve the Iowa registration renewal request for Mount Carmel College of Nursing for a two-year term that begins retroactively on November 17, 2014 through November 17, 2016.

Registration Purpose

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 (effective July 1, 2012) require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this State or if the school otherwise has a presence in this State. Presence means a location in Iowa at which a student participates in any structured activity related to a school's distance education course of instruction. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations.

Mount Carmel College of Nursing (the College) applied for registration to offer distance education programs. Staff required the College to register because the school is requesting to offer distance education programs to Iowa residents which contain field work to be completed by an Iowa resident student at an Iowa location. In addition, Iowa-based affiliates of the College are conducting an operational activity on the school's behalf at Iowa locations, specifically promoting the College's distance education program. Mercy Medical Centers in Clinton, Dubuque, Dyersville, Mason City, New Hampton, and Sioux City are subsidiaries of Trinity Health, Mount Carmel College of Nursing's parent company. These Iowa hospitals are distributing information about the distance education program offered by Mount Carmel College of Nursing to their employees.

Institutional Information

Mount Carmel College of Nursing is a private non-profit institution whose main campus is located at 127 South Davis Avenue, Columbus, Ohio 43222. The school's chief executive officer is President, Christine A Wynd, PhD. Due to the fact that the College is applying for registration to offer wholly online programs in Iowa, it has no Iowa contact person. The College is not registered with the Iowa Secretary of State as a corporation conducting business in Iowa, and the Commission cannot require that it do so.

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

Accreditation: The College is accredited by the Higher Learning Commission of North Central Association of Colleges and Schools (HLC). HLC is a regional accrediting agency recognized by the federal Department of Education. In addition, Mount Carmel College of Nursing holds specialized accreditation from the Commission on Collegiate Nursing Education for

baccalaureate and graduate level nursing programs that it offers to lowans via distance education. The Commission on Collegiate Nursing Education is recognized by the United Stated Department of Education.

Federal Stafford Loan Cohort Default Rate (FFY 2013): 1.1%. For comparison purposes, the FFY 2013, national average cohort default rate is 11.3%.

Graduation Rate: This is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion, as reported to the federal Department of Education. The graduation rate for Mount Carmel College of Nursing is 72%.

Average Loan Debt upon Graduation: The College reports the following average debt upon graduation:

- Average for all students at all educational levels: \$42,120
- Average for online RN-BSN completion program students: \$14,770

Record Preservation: The College maintains electronic copies of all student records. These records can be officially accessed from the student electronic database by staff in the Records and Registration Office. The records are retained permanently. A permanent academic record is maintained for each graduate of the program and includes secure electronic storage of the final Mount Carmel College of Nursing academic transcript; degree awarded and program completion date. The record also includes the application for admission and final official transcripts from other colleges/ universities that would verify transfer of credit to the College, Veteran Administration paperwork (if applicable), and other Mount Carmel College of Nursing post-matriculation correspondence and documentation. They are retained for one year following graduation and then are electronically archived.

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

Mount Carmel College of Nursing
Office of Records and Registration
127 South Davis Avenue
Columbus, Ohio 43222
(614) 234 – 3522
<http://www.mccn.edu/students/transcript-request>

Instructional Methodology: The College delivers course content through an Online Learning Management System using asynchronous classroom instruction. The College also uses Big Blue Button web-conferencing to provide synchronous, real-time and interactive classroom instruction. The course also contains one-on-one advising via web conferencing which is facilitated using Good apps/Google Hangouts.

The College provides a student email account to each registered student. This is done through an email system called Nightingmail, a G-mail product for higher education. Once a student is admitted to the College, email communication regarding all of the College's business should be conducted exclusively through Nightingmail.

CARMELink is the student portal which all students have access to. CARMELink is password-protected and contains information from a student's record; final course grades, billing and financial aid information, course schedule, etc.; and direct access to courses in which the student is enrolled. Alternately, students may login directly to the learning management system, Canvas. The student is enrolled in courses via MyMCCN Canvas. The CARMELink username and default password are provided to the student via their Nightingmail email account.

MyMCCN Canvas is the Mount Carmel College of Nursing learning management system (LMS). Both CARMELink and MyMCCN use the same username and password for authentication.

Students needing assistance with the student portal, LMS, or email can do so by emailing helpline@mccn.edu or calling 614-401-6226. Students must request assistance through their Nightingmail accounts.

Student Learning Resources: The College provides students with a number of learning resources and services. Students of the College are introduced to the Library during a mandatory orientation to online learning, which is provided free of charge prior to the beginning of coursework. Students are directed to the Mount Carmel Health Sciences Website, www.mccn.edu/library. Students have access to tutorials, a large selection of e-books and e-journals, and numerous database systems. Students may access advising and support via email, phone, web-conferencing or through the LMS. Students will log in to the library services using their student ID number. Those who encounter problems or need additional assistance can request help via library@mchs.com or 614-234-5214.

The College maintains a service, Touch Base with Your Librarian, through which students can communicate with a librarian who will follow up with them within 24 hours of the request. In addition to this service, the College does maintain a Ask a Librarian service which is available during hours of operation.

The College maintains Mount Carmel Health System (MCHS) clinical systems which provide access to patient care information while functioning in the role of student nurse in clinical experiences. Clinical faculty provides students with appropriate passwords. Students encountering problems with access should contact MCHS IR Customer Support, 614-234-8700.

Students enrolled in clinical nursing courses are required to complete annual MCHS student orientation and sign a confidentiality agreement. Nursing faculty will provide detailed instructions for MCHS student orientation.

More information about the services offered at the College can be located at <http://catalog.mccn.edu/content.php?catoid=12&navoid=665>.

Curriculum Evaluation and Development: The College ensures that a number of its faculty participates in the development and evaluation of curriculum. Each faculty member who is involved holds appropriate degrees. This is verified upon hire and also independently by the Collegiate Commission of Nursing Education during reviews held every five years. The Undergraduate Curriculum Committee consists of 12 faculty members. Five of those 12

faculty members hold master level degrees. The remaining seven hold doctoral level degrees. One of which is the Associate Dean for the Undergraduate Nursing Program.

Through investigation of each course syllabus and interviews with select faculty, we have benchmarked both the Online RN-BSN Completion Program and Online Nurse Educator MS track/post-master's certificate programs to national standards, [The Essentials of Baccalaureate Education for Professional Nursing](#) and [The Essentials of Master's Education in Nursing](#), respectively. Through this work, we have discovered curriculum gaps, risks for gaps and filled them through meetings in the Online Council and Graduate Council. Dr. Tara Spalla, the College's Academic Dean, is an onsite peer reviewer for the Commission for Collegiate Nursing Education (CCNE), the College's nursing accreditation body.

Student Complaints Process: The College maintains a specific policy for filing complaints. Complaints must be made formally in writing, signed by the student, and addressed to and submitted to a College Executive, for example: President/ Dean, Associate Dean, Director of Records and Registration, or Director of Business Affairs. Only formal complaints will be tracked and pursued. The College executive who receives the written formal complaint will respond in writing regarding institutional action taken in response to the complaint. Complaints sent by email or by fax do not constitute formal, written complaints. The complete complaint process is posted on the College's Website at <http://catalog.mccn.edu/mime/media/14/254/8.12.16+Student+Complaints.pdf>.

The College will share information about formal written complaints in which there is verification of violation of College policy with the HLC or US Department of Education affiliate agencies, but will not reveal the student's identity without the expressed consent of the student.

- The date the complaint was formally submitted to a College Executive.
- The nature of the complaint.
- The steps taken by the institution to resolve the complaint.
- The institution's final decision regarding the complaint, including referral to outside agencies.
- Any other external actions initiated by the student to resolve the complaint, if known to the institution.

All documented information regarding student complaints will be maintained in the Office of the President.

Student may file complaints with the Iowa College Student Aid Commission at any point in time, http://www.mccn.edu/pdf/academic_programs/rnbsn/lowa_Info.pdf.

Distance Education Programs Offered In Iowa

Education Programs: The total, estimated cost of tuition, fees, books and supplies for each program offered in an online format are listed below:

Undergraduate Programs

- Registered Nurse – Bachelor of Science in Nursing: \$19,333

Graduate Programs

- Master of Science, Nursing Education: \$16,950

Post-Master's Certificate Programs

- Nursing Education: \$9,084
- Nursing Administration: \$11,954

Field Experience: One program which the College offers through distance education contains a form of field work to be completed. The field work may be completed at an approved location in Iowa. The Master of Science in Nursing Education program contains two practicum courses required for completion. One of these practicum courses is the Educator Practicum. The Educator Practicum course offers supervised practice of teaching in the areas of higher education, and/ or staff development/ continuing education. This course is a requirement of 150 clinical hours.

Registration Compliance

As required by Iowa Code Section 261B.4, the College discloses its institutional policy for refunding tuition charges to students who withdraw from its programs. Iowa registration law and rule do not govern the College's tuition refund policy because it is not a for-profit institution. The refund policy is located at:

- [http://catalog.mccn.edu/content.php?catoid=12&navoid=648#Institutional Refund Policy](http://catalog.mccn.edu/content.php?catoid=12&navoid=648#Institutional_Refund_Policy)
- [http://catalog.mccn.edu/content.php?catoid=13&navoid=817#Institutional Refund Policy](http://catalog.mccn.edu/content.php?catoid=13&navoid=817#Institutional_Refund_Policy)
- <http://catalog.mccn.edu/content.php?catoid=13&navoid=816>
- <http://catalog.mccn.edu/content.php?catoid=12&navoid=653>

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. 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 College complies with the requirements of Iowa Code Section 261.9(1)(e) and (f), and discloses these policies to students in various locations and documents posted on its website and Catalog, those locations are:
 - ✓ <http://www.mccn.edu/about/compliance/consumer-information-details>
 - ✓ <http://www.mccn.edu/pdf/asr-fire-safety-report.pdf>
 - ✓ [http://catalog.mccn.edu/content.php?catoid=12&navoid=654#Campus Safety and Security](http://catalog.mccn.edu/content.php?catoid=12&navoid=654#Campus_Safety_and_Security)
 - ✓ [http://catalog.mccn.edu/content.php?catoid=12&navoid=645#Drug-Free Policy](http://catalog.mccn.edu/content.php?catoid=12&navoid=645#Drug-Free_Policy)
 - ✓ [http://catalog.mccn.edu/content.php?catoid=13&navoid=807#Drug-Free Policy](http://catalog.mccn.edu/content.php?catoid=13&navoid=807#Drug-Free_Policy)
 - ✓ <http://catalog.mccn.edu/index.php>
 - ✓ <http://catalog.mccn.edu/index.php>
 - ✓ <http://catalog.mccn.edu/content.php?catoid=13&navoid=815&hl=counseling&returnto=search>
 - ✓ <http://catalog.mccn.edu/content.php?catoid=12&navoid=662&hl=counseling&returnto=search>

- ✓ <http://catalog.mccn.edu/content.php?catoid=12&navoid=645&hl=sexual+assault&returnto=search>
- ✓ <http://catalog.mccn.edu/content.php?catoid=13&navoid=807&hl=sexual+assault&returnto=search>
- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy for refunding tuition and mandatory fees 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 state or federal military duty or service. The College maintains a compliant policy on military deployment which can be found in its graduate and undergraduate catalogs at:
 - ✓ http://catalog.mccn.edu/content.php?catoid=14&navoid=997&hl=military+deployment&returnto=search#military_deployment_policy
 - ✓ http://catalog.mccn.edu/content.php?catoid=15&navoid=1098&hl=military+deployment&returnto=search#military_deployment
- Iowa Code Section 261.9(1)(h) requires a school to develop and implement a policy requiring employees, who in the course of their employment, attend, examine, counsel, or treat a child to immediately report suspects incidents of child physical and sexual abuse to law enforcement and to the school. By cross-reference to existing administrative rules for registration [283-21.2(261B), subsection 7], this policy applies to schools that offer distance education programs and that have Iowa-resident employees or contractors (including online program faculty). Since the College has no compensated parties in Iowa conducting operational activity on the school's behalf, this policy is not required.

Student Consumer Information: In its registration application, the University affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires a school to disclose to students 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 the College discloses them in its Catalogs and on its website:

- <http://catalog.mccn.edu/index.php>
- <http://catalog.mccn.edu/index.php>
- <http://www.mccn.edu/academics>
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Mount Carmel College of Nursing affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7. Provided the school does not claim "approval" or "accreditation," the school must disclose to students that it is registered by the Commission and provide Commission contact information for students who have questions or complaints about the school. The College discloses this information to Iowa-resident students at

- http://www.mccn.edu/pdf/academic_programs/rnbsn/lowa_Info.pdf.

Financial Responsibility: The College submitted a copy of an independent audit conducted by Deloitte & Touche, LLP, dated September 23, 2015 for the institutional fiscal years ending June 30, 2015 and 2014. The auditing firm expressed its opinion that the financial statements of the College present fairly, in all material respects, the financial position of the College.

- A private non-profit institution 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 Mount Carmel College of Nursing reported by the federal Department of Education is for the institutional fiscal year ending June 30, 2013: 2.9 (out of a possible 3.0).
- The institution is not required to calculate the percentage of its revenue derived from federal student aid funds since it is not a for-profit institution.

Full-Time Iowa Resident Faculty Member or Program Coordinator: Iowa administrative rules exempt schools from employing a full-time, Iowa-based faculty member or program coordinator if the school applies for authorization to offer only distance education programs. Mount Carmel College of Nursing is registering to offer distance education programs and does not employ any Iowa residential faculty or staff.

Instructional/Supervisory Staff Qualifications: The College provided credentials for 21 faculty members who provide instruction in its online programs. One faculty member holds a Bachelor of Science in Nursing degree, the online course that this member provides instruction in is a nursing course in the undergraduate program. 14 of the 21 faculty members hold a masters level degree, including: business administration, nursing, pharmacy, and public health. Six of the 21 faculty members hold doctoral degrees. One of the 21 instructors is the Online Registered Nurse –Bachelor of Science in Nursing Program Admissions and Academic Advisor. One faculty member is the Associate Dean for Distance Education; another is the Director of the Doctor of Nursing Practice Program.

Commitment to Iowa Students and Teach-Out: By executing her signature on the registration application, Mount Carmel College of Nursing President, Christine A Wynd, PhD, RN, committed to the delivery of programs the College offers and agreed to provide alternatives for students to complete programs at the College or another school if the College closes a program, or if the College closes before students have completed their courses of study.

Student Complaints: None.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

Mount Carmel College of Nursing qualifies for an exemption from Iowa’s financial responsibility laws under Iowa Code Section 714.19, subsection 2, as a school “. . .of nursing accredited by the board of nursing or an equivalent public board of another state. . .”

Section 714.23 – State Tuition Refund Policy

The Iowa tuition refund policy does not apply to Mount Carmel College of Nursing because it is not a for-profit institution.