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Because College Changes Everything

April 16, 2021

Alexis Harris

Director of State Authorization and Title IX Coordinator, Institutional Effectiveness, Planning and Compliance

Columbia Southern University on behalf of Waldorf University

Transmitted via email to alexis.harris@columbiasouthern.edu

Dear Alexis:

Iowa Code Sections 261B.2 (definitions) and 261B.3 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.

Waldorf University (the University) is presently considered exempt from registration in Iowa under Iowa Code Section 261B.11, subsection 1, paragraph j, i.e., the University meets the institutional eligibility conditions for the Iowa Tuition Grant program. However, the University wishes to maintain voluntary registration in Iowa to comply with federal regulations in 34 CRF 600.9(a). These federal regulations require a school participating in the federal student aid programs to be authorized to operate, by name, as a postsecondary educational institution by an action of the State in which the school is located. The University's online programs are also acknowledged under its Iowa registration.

Under authority granted by its board of Commissioners, the Commission's Postsecondary Registration Administrator has approved the University's Iowa registration renewal for a two-year period that begins retroactively on March 17, 2021 through March 16, 2023.

Under Iowa Code Section 714.18, schools must also file evidence of financial responsibility with Iowa College Aid and reapply to demonstrate continuing compliance, at minimum, every two years. Waldorf University has met this requirement and filed satisfactory evidence of financial responsibility including the requisite instructional school bond that is payable to the State of Iowa in the amount of \$50,000.

Generally, Iowa Code Section 261B.5 requires a registered school to notify the Commission of any change in the information that the school submitted and that the Commission approved as part of the school's registration application. This includes, but is not limited to, a change in leadership or ownership, the closure of a program, or the addition of new programs. Email notification to the Postsecondary Authorization Administrator, Jayne Smith, at Jayne.Smith@iowa.gov is sufficient.

Registration in Iowa does not infer that the Commission or the State of Iowa endorses the school or approves the quality of the school's educational programs. The Commission's registration authorizes the school to operate within the State of Iowa for the purpose of offering postsecondary educational programs.

A school that wishes to maintain its registration must renew its registration every **two** years. The Commission should receive a registration renewal application within six months prior to the ending date of the school's current registration term identified above. The Commission does not send out registration renewal notices.

Registration Fee: Iowa Administrative Code 283-21.12(2) requires that postsecondary schools must remit an annual registration fee to the Commission so long as it remains registered in Iowa. This annual fee has no relationship to the date of a school's registration renewal application or approval; rather, the fee is due by July 15 of each calendar year. The amount of the fee due from the school is based on the number of full-time equivalent (FTE) enrolled students that the school reports to the Integrated Postsecondary Education Data System (IPEDS), as follows:

- \$2,000/year for schools with fewer than 2,500 FTE students
- \$4,000/year for schools with between 2,500-9,999 FTE students
- \$6,000/year for schools with 10,000 or more FTE students

Thus, the University owes no fee payable to the Commission at this time. Instead, the University must pay the Commission an annual fee, which will be due by July 15, 2021. Going forward, the University must continue to pay the Commission the annual fee by July 15 of each subsequent calendar year as long as the University maintains its Iowa registration. The Commission will invoice the University via email to its primary state authorization contact approximately 60-90 days in advance of the annual fee due date.

Thank you for your assistance during our evaluation of the University's Iowa registration renewal application. If you have any questions or need any assistance at any time, please feel free to contact me at (515) 725-0959 or by e-mail at jayne.smith@iowa.gov.

Sincerely,



Jayne M. Smith, J.D.
Postsecondary Authorization Administrator