STAFF REPORT AND RECOMMENDATION FOR
SAINT ANDREWS UNIVERSITY/WEBBER INTERNATIONAL UNIVERSITY

Background

St. Andrews University/Webber International University (OPEID 00154000) (St. Andrews), located in Laurinburg, is an existing licensee in good standing. St. Andrews is a branch of Webber International University (Webber), located in Babson Park, Florida, and is a member of the North Carolina Independent Colleges and Universities (NCICU). St. Andrews is subject to licensure by the Board for all programs initiated after its 2011 merger with Webber. The institution is regionally accredited by the Southern Association of Colleges and Schools and seeks authorization to offer a Bachelor of Science in Sports Performance, Health, and Fitness; a Bachelor of Arts in Health Services Administration; and a Bachelor of Science in Occupational Therapy Assisting. Because some of these proposed degrees rely heavily on labs and other facilities, staff and an examiner conducted a visit to St. Andrews as part of the application review.

BS in Sports Performance, Health, and Fitness

Staff Recommendation: Approval
Program Site: Laurinburg, NC
Projected start date: Upon Licensure
Projected enrollment: 20

Staff and an examiner conducted a review of the BS in Sports Performance, Health, and Fitness application. This work yielded a report that contained eight findings. The findings included issues related to the program’s internship component, the amount of science courses required, and the curriculum presented on the course syllabi. St. Andrews responded to the report, and staff believes that St. Andrews’ responses show that it will operate in compliance with the Rules and Standards.

BA in Health Services Administration

Staff Recommendation: Approval
Program Site: Laurinburg, NC
Projected start date: Upon Licensure
Projected enrollment: 15

This program is designed to augment St. Andrews’ existing business education programs. Staff and an examiner conducted a review of the BA in Health Services Administration application. This work yielded a report that contained four findings. The findings included issues related to the amount of natural science courses required, the curriculum presented on the course syllabi, disclosures to students regarding the available pace of the program, and faculty qualifications. St. Andrews responded to the report, and staff believe St. Andrews’ responses show that it will operate in compliance with the Rules and Standards.

BS in Occupational Therapy Assisting

Staff Recommendation: Approval
Program Site: Laurinburg, NC
Projected start date: Fall 2020
Projected enrollment: 20

Staff and the examiner’s review of this program yielded four findings. The findings related to disclaimers that
would be displayed on the program’s marketing materials until the program became programmatically accredited, the required qualifications for the program’s director, and the institution’s plans for the program’s students if the program fails to become programmatically accredited. St. Andrews responded to those findings, and staff believe St. Andrews’ responses show that it will operate in compliance with the Rules and Standards.

### Institutional Metrics and Consumer Protection Information

<table>
<thead>
<tr>
<th>Metric</th>
<th>Graduated</th>
<th>Transferred Out</th>
<th>Withdrew</th>
</tr>
</thead>
<tbody>
<tr>
<td>8-year outcomes</td>
<td>32%</td>
<td>36%</td>
<td>32%</td>
</tr>
<tr>
<td>Employment Placement Rate</td>
<td>90.4%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Federal Financial Composite Score (3.0 is highest, -1.0 is lowest) (Webber)</td>
<td>2017 1.6 2016 2.1 2015 2.6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Three-year cohort default rate (Webber)</td>
<td>Class of 2016 8.3 Class of 2015 13.9 Class of 2014 17.4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

State authorization staff did not receive any complaints regarding St. Andrews in the 2018-2019 academic year.

### Recommendation

Issue St. Andrews a license to offer the BS in Sports Performance, Health, and Fitness, the BA in Health Services Administration, and the BS in Occupational Therapy Assisting.

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i Unless otherwise noted, this is data reported by the institution to the U.S. Department of Education, and includes both full and part time students and first-time and transfer-in students.

ii This data is reported pursuant to the state of Florida’s standards, which is where Webber International University is based. “Employed” means all graduates who, six months after graduation, are employed full- or part-time, or who are pursuing an advanced degree, or who are serving the nation in the military, Peace Corps, etc.

iii This is a general measure of the institution’s financial solvency. A score of 1.5 of greater means the institution does not face additional federal restrictions on operating because of financial solvency concerns.

iv Three-year cohort default rate (“CDR”) is the percentage of graduates who borrowed federal loans and who defaulted on those loans within three years of graduating. For example, a CDR for a cohort graduating in 2015 can be calculated three years later, in 2018.
STAFF REPORT AND RECOMMENDATION FOR
THALES COLLEGE

Background

Thales College, Inc. (Thales), to be located in Wake Forest, is a first-time applicant. Thales seeks to offer a liberal arts and sciences education through a Great Books and cohort-based model. It is affiliated with Thales Academy, a network of private, non-sectarian primary and secondary schools. Thales will not seek accreditation, and students who attend will not be eligible for Federal Student Aid.

Staff and a team of examiners conducted a site visit to Thales on March 12, 2019. Because Thales has not operated in another state for two years, it is eligible only for an Interim Permit, which will expire two years after the Board issues it. During that time, if Thales demonstrates compliance with the Rules and Standards, the Board may issue it a regular license.

Bachelor of Arts in Liberal Arts and Sciences

Staff Recommendation: Approval
Program Site: Wake Forest, NC
Projected start date: Fall 2020
Projected enrollment: 20

Thales intends to offer one program, a Bachelor of Arts in Liberal Arts and Sciences. The site visit and our review of the application led to sixteen findings. In particular, because Thales will not seek accreditation, it is unlikely that credits earned at Thales will transfer to accredited institutions. Thales agreed to provide students a prominent disclaimer to that effect in its course catalog, and the course catalog must be provided to students at least five days prior to Thales’ receipt of non-refundable money in accordance with the Rules and Standards. Other initial concerns would be alleviated by: requiring additional disclosures in Thales’ course catalog and promotional materials; ensuring faculty stability; establishing procedures to monitor conflicts of interest on Thales’ Board of Directors; guaranteeing access to appropriate library resources; ensuring that Thales’ has a plan for students who are unable to remain with their cohort; and obtaining additional information and projections regarding the institution’s financial solvency.

Thales provided a response to each of these questions in November 2019. Based on those responses, staff believes Thales has demonstrated that it will operate according to the Rules and Standards during the term of its Interim Permit.

Recommendation

Issue Thales an Interim Permit to offer the Bachelor of Liberal Arts and Sciences.
STAFF REPORT AND RECOMMENDATION FOR
WALDEN UNIVERSITY

Background

Walden University (OPEID 00154000) (Walden), located in Minneapolis, Minnesota, is an existing licensee in good standing. The institution is regionally accredited by the Higher Learning Commission and seeks to authorization to offer a Doctor of Nursing Practice (DNP). Walden seeks to offer the DNP at clinical sites only and does not anticipate a brick-and-mortar presence in North Carolina.

Doctor of Nursing Practice

Staff Recommendation: Approval
Program Site: Clinical sites throughout North Carolina
Projected start date: Upon Licensure
Projected enrollment: 20

Staff and examiners reviewed this program and made findings regarding the curriculum, faculty qualifications, and methods for selecting and evaluating appropriate clinical sites and preceptors. Walden adequately responded to these questions and demonstrated that it would operate the program in compliance with the Rules and Standards. Walden's DNP is programmatically accredited by the Commission on Collegiate Nursing Education.

Institutional Metrics and Consumer Protection Information

<table>
<thead>
<tr>
<th>Metric</th>
<th>2018</th>
<th>2017</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Graduated</td>
<td></td>
<td></td>
<td>22%</td>
</tr>
<tr>
<td>Transferred Out</td>
<td></td>
<td></td>
<td>35%</td>
</tr>
<tr>
<td>Withdrew</td>
<td></td>
<td></td>
<td>42%</td>
</tr>
<tr>
<td>Employment Placement Rate[^ii]</td>
<td>Does not report – not required by accreditor</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Federal Financial Composite Score (3.0 is highest, -1.0 is lowest)[^iii]</td>
<td>2.6</td>
<td>2.9</td>
<td>3.0</td>
</tr>
<tr>
<td>Three-year cohort default rate[^iv]</td>
<td>Class of 2016</td>
<td>Class of 2015</td>
<td>Class of 2014</td>
</tr>
<tr>
<td></td>
<td>6.9</td>
<td>7.3</td>
<td>7.5</td>
</tr>
</tbody>
</table>

State authorization staff did not receive any complaints regarding Walden in the 2018-2019 academic year.

Recommendation

Issue Walden a license to offer the Doctor of Nursing Practice.
i Unless otherwise noted, this is data reported by the institution to the U.S. Department of Education, and includes both full and part time students and first-time and transfer-in students.

ii Unless otherwise noted, this data is reported by the institution to its accreditor according to its accreditor’s standards and definitions. It is the most recent data available for the program under consideration.

iii This is a general measure of the institution’s financial solvency. A score of 1.5 or greater means the institution does not face additional federal restrictions on operating because of financial solvency concerns. In Walden’s case, the Department of Education agreed to provide Walden these unofficial scores based on Walden’s finances separated from the finances of its parent company.

iv Three-year cohort default rate (“CDR”) is the percentage of graduates who borrowed federal loans and who defaulted on those loans within three years of graduating. For example, a CDR for a cohort graduating in 2015 can be calculated three years later, in 2018.
Requests for Limited License

The following institution, located in a jurisdiction which is not a member of the National Council for State Authorization Reciprocity Agreements, seeks limited licensure to conduct postsecondary activity for a limited period of time.

**West Coast Ultrasound Institute**, a private, nationally accredited for-profit institution located in California, seeks limited licensure to allow one student to participate in a clinical rotation in North Carolina. The student is the spouse of a military member being transferred to North Carolina. Staff recommends issuing a limited license to the institution allowing its student to conduct the clinical rotation, with the license expiring on May 31, 2021.