

**STAFF REPORT AND RECOMMENDATION FOR WEBBER INTERNATIONAL UNIVERSITY****Background**

Webber International University/Saint Andrew's University (OPEID 00154001) (Saint Andrew's), located in Laurinburg, North Carolina, is an existing licensee in good standing. The institution is regionally accredited by the Southern Association of Colleges and Schools (SACS) and seeks authorization to offer a Master of Arts in Education. Staff last visited Saint Andrew's in October 2019.

**Master of Arts in Education**

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

Staff and examiners reviewed this program and made findings regarding the curriculum length, faculty, and methods for selecting and evaluating appropriate clinical sites and preceptors. Saint Andrew's adequately responded to these questions and demonstrated that it would operate the program in compliance with the Rules and Standards.

**Institutional Metrics and Consumer Protection Information**

<b>Metric</b>			
8-year outcomes <sup>i</sup>	Graduated	38%	
	Transferred Out	34%	
	Withdrew	27%	
Employment Placement Rate <sup>ii</sup>	Does not report – not required by accreditor		
Federal Financial Composite Score (3.0 is highest, -1.0 is lowest) <sup>iii</sup>	<b>2019</b>	<b>2018</b>	<b>2017</b>
	2.2	2.2	1.5
Three-year cohort default rate <sup>iv</sup>	<b>Class of 2016</b>	<b>Class of 2015</b>	<b>Class of 2014</b>
	8.3	13.9	17.4

State authorization staff did not receive any complaints regarding Saint Andrew's in the 2019-2020 academic year.

**Recommendation**

Issue Saint Andrew's a license to offer a Master of Arts in Education.

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

<sup>ii</sup> 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.

<sup>iii</sup> 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.

<sup>iv</sup> 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 2016 can be calculated three years later, in 2019.

**STAFF REPORT AND RECOMMENDATION FOR  
THALES COLLEGE**

**Background**

Thales College, Inc. (Thales), located in Wake Forest, holds an interim permit issued by the Board of Governors in September 2019. 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. Thales has not yet begun operations, and so has no institutional metrics to report.

Staff and a team of examiners conducted a site visit to Thales on March 12, 2019, when it applied to offer a Bachelor of Arts in Liberal Arts and Sciences.

**Bachelor of Arts in Entrepreneurial Business**

Staff Recommendation: Approval  
Program Site: Wake Forest, NC  
Projected start date: Fall 2021  
Projected enrollment: 40

The site visit and our review of Thales' initial application led to 16 findings, and our review of Thales' application for the new program led to two more. 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 included: additional required disclosures in Thales' course catalog and promotional materials, ensuring faculty stability, procedures to monitor conflicts of interest on Thales' Board of Directors, guaranteeing access to appropriate library resources, ensuring Thales' has a plan for students who are unable to remain with their cohort, and the institution's financial solvency.

Thales provided thorough responses to these findings. 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.

**Institutional Metrics and Consumer Protection Information**

Thales has not begun operations and has no metrics to report.

**Recommendation**

Issue Thales an Interim Permit to offer the Bachelor of Arts in Entrepreneurial Studies.

**STAFF REPORT AND RECOMMENDATION FOR  
THE UNIVERSITY OF SOUTHERN CALIFORNIA**

**Background**

The University of Southern California (OPEID 00132800) (USC), an existing licensee in good standing, seeks approval to offer a Master's of Public Policy in North Carolina. USC seeks to offer clinical placements for these programs and has no current plans to establish a brick-and-mortar presence in the state. USC is regionally accredited by the Western Association of Schools and Colleges.

**Master's of Public Administration**

Staff Recommendation: Approval

Program Site: Various clinical sites in NC

Projected start date: Upon Licensure

Projected enrollment: Fewer than 10

USC's Masters of Public Policy program includes a 300-hour experiential learning placement for students who do not have two years of work experience prior to entering the program. North Carolina residents may complete that experiential learning placement in the state. Staff and a public policy subject-matter expert reviewed this application and found that the proposed program complies with the Rules and Standards for Licensure. Staff last visited USC on May 15, 2019, as part of its most recent application for licensure in North Carolina.

**Institutional Metrics and Consumer Protection Information**

<b>Metric</b>			
8-year outcomes <sup>i</sup>	Graduated	92%	
	Transferred Out	5%	
	Withdrew	3%	
Employment Placement Rate <sup>ii</sup>	Does not report – not required by accreditor		
Federal Financial Composite Score (3.0 is highest, -1.0 is lowest) <sup>iii</sup>	<b>2018</b>	<b>2017</b>	<b>2016</b>
	2.9	3.0	3.0
Three-year cohort default rate <sup>iv</sup>	<b>Class of 2016</b>	<b>Class of 2015</b>	<b>Class of 2014</b>
	1.6	1.8	2.0

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

**Recommendation**

License USC (OPEID 00132800) to offer a Masters of Public Administration.

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

<sup>ii</sup> 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.

<sup>iii</sup> 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.

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<sup>iv</sup> 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  
WATTS COLLEGE OF NURSING**

**Background**

Watts College of Nursing, OPEID 00648300, (Watts), holds an interim permit issued by the Board of Governors in January 2019. The Board may issue an interim permit when an applicant has not conducted degree granting activity for two years, but otherwise meets the standards for licensure. An interim permit expires two years after the Board grants it but may be converted to a regular license. Watts has operated non-degree nursing programs since 1895 but is winding down those programs. It will soon offer only a Bachelor of Science in Nursing. Watts is programmatically accredited by the Accrediting Bureau of Health Education Schools and is an affiliated entity of Duke University Health System (DUHS). It is in good standing with the North Carolina Board of Nursing. As part of our review, staff visited Watts on December 21, 2020.

**Review of Performance while operating under an interim permit**

Prior to granting the interim permit, the Board required Watts to make adjustments to its operating plans to come into compliance with the standards for licensure. Our review determined that Watts substantively complied with those requirements. Two remaining areas of noncompliance have been resolved since our review began. First, the institution's chief executive also served as the chair of the institution's board, an arrangement impermissible under Section 400.4.1, IV.K.2.b., of the UNC Policy Manual. The chief executive has decided to step down from her role as board chair. Second, Watts relies on DUHS for library services. This arrangement is permissible, but there was no evidence that Watts faculty and students engaged in a "formal, iterative planning and assessment process" with DUHS libraries to ensure that the libraries adequately met students' needs, as required by Section 400.4.1, IV.K.2.b., of the UNC Policy Manual. Watts and DUHS have provided new procedures which remedy this deficiency.

Staff undertook a survey of current Watts students as part of our review process. Thirty-one students — approximately 51 percent of current enrollees — responded. One student reported confusion regarding tuition charges. In response, the school provided its policies regarding how it communicates tuition and changes to tuition to students and prospective students. Those policies comply with the standards. Otherwise, student responses to the survey were uniformly positive.

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**Institutional Metrics and Consumer Protection Information**

<b>Metric</b>			
8-year outcomes <sup>i</sup>	Graduated	Not available – no graduates in degree programs	
	Transferred Out		
	Withdrew		
Employment Placement Rate <sup>ii</sup>		Not available – no graduates in degree programs	
Federal Financial Composite Score (3.0 is highest, -1.0 is lowest) <sup>iii</sup>	<b>2018</b>	<b>2017</b>	<b>2016</b>
	3.0	3.0	2.2
Three-year cohort default rate <sup>iv</sup>	<b>Class of 2016</b>	<b>Class of 2015</b>	<b>Class of 2014</b>
	Not available – no graduates in degree programs		

State authorization staff did not receive any complaints regarding Watts in the 2019-2020 academic year.

**Recommendation**

License Watts (OPEID 00648300) to offer a Bachelor of Science in Nursing.

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### **Request 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.

**California State University, Sacramento (OPEID 00116400)**, a public, regionally accredited non-profit institution, seeks limited licensure to allow one student in the school's Bachelors of Science in Recreation Therapy program to participate in a clinical rotation at the Clay County Care Center in Hayesville, NC. Staff recommends issuing a limited license to the institution allowing its student to conduct the clinical rotation, with the license expiring on June 30, 2021.