

Review Committee Report of Findings Concerning the Application from Purdue University Global for

Authority to confer academic degrees or to offer degree course/programs in the State of Maine.

June 7, 2018 Augusta, Maine

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I. <u>INTRODUCTION</u>

In response to the application submitted by Purdue Global and in accordance with the Department of Education policies 05-071-149 and 05-071-170 set forth by the Maine State Board of Education, a team was organized by Jason Libby, Higher Education Specialist, to review the procedures and standards relating to the application for authorization to confer academic degrees or to offer degree courses/programs in the State of Maine by an out-of-state institution.

The visiting team met at the Purdue Global campus in Augusta, Maine with applicant administrators, faculty and staff on Thursday, June 7, 2018. The review team was comprised of Dr. Lynne Coy-Ogan, Chair, Senior Vice President for Academic Affairs and Provost at Husson University; Dr. Michael Paradales, Vice President and Chief Learning Officer at Saint Joseph's College; Dr. Robert Placido, Associate Vice Chancellor for Academic Affairs for the University of Maine System; Emily Gribben, Educator Effectiveness Coordinator for the Maine Department of Education, and Dr. Wilson Hess, State Board Observer. The team was also joined by Ángel Loredo, Director, Higher Education and Educating Support Service and Jason Libby, Higher Education Specialist from the Maine Department of Education.

According to information submitted by Purdue Global, the review team noted that the Higher Learning Commission, at its meeting on February 22, 2018, voted to approve the extension of accreditation under the Commission's policy on Change of Control, Structure or Organization related to the application wherein Purdue University through its affiliate Purdue NewU, Inc., acquires certain assets of Kaplan University, with the successor of Kaplan University to henceforth be owned and operated by Purdue University as a separately accredited institution known as Purdue University Global. The Higher Learning Commission placed Purdue University Global on the Standard Pathway with its next comprehensive evaluation for reaffirmation of accreditation in 2022-23.

II. REVIEW OF APPLICATION – FINDINGS FOR EACH STANDARD

Standard A: Organization and Governance

- 1. The institution has a current written document detailing administrative responsibilities of the governing board, administrators, the faculty, the staff, and the students (if staff and students participate in institutional governance).
- 2. The institution has an organizational chart that clearly shows lines of authority and the relationship among component units and personnel.

The Governance Manual for Purdue Global was reviewed by team members and found to outline a clear structure for governance procedures as well as define the role of faculty, academic administrative processes and student support services. Additionally, the Governance Manual offered descriptions for the role of Faculty Senate, institutional committees and University policies. The Bylaws defined the membership and responsibilities of the Board of Trustees

including the meeting structure, duties, and committees. Purdue Global currently has six trustees.

Recently acquired from Kaplan University, Purdue Global operates two sites within the State of Maine in Augusta and Lewiston. The review team interviewed twelve members of the administration and faculty in addition to reviewing the Governance Manual and Purdue Global Bylaws. The institution provided organizational charts that outlined clear lines of authority and decision making for both on-campus and off-campus operations. Interviews conducted confirmed the faculty and staff have active roles in decision making as outlined in the Governance Manual. This level of clarity is especially important given the recent transition from Kaplan University to Purdue Global and the combination of on-campus and extensive off-campus offerings.

The review team finds the standards are met for section A.

Standard B: Institutional Objectives

- 1. The institution has defined its educational mission and general purposes or goals, and has included within its "statement of purpose" such uniqueness of programming and educational philosophy as may be inherent in the proposed degree offerings.
- 2. The institution's "statement of purpose" is readily identifiable through its course and program offerings.

Purdue Global has clearly defined its overall educational mission and general goals. The institution's statement of purpose is readily identifiable throughout their course and degree offerings available to students through its website and program materials.

The mission of Purdue Global is strongly aligned to the previous mission of Kaplan University and interviews confirmed the vision of the transition was to provide a great deal of continuity to current students. The mission places an emphasis on the adult learner and the University's ongoing commitment to support learners in a global society.

"Purdue Global is an institution of higher learning dedicated to providing innovative undergraduate, graduate, and continuing professional education. Our programs foster student learning with opportunities to launch, enhance, or change careers in a diverse global society. Purdue Global is committed to general education, a student-centered service and support approach, and applied scholarship in a practical environment."

The application outlines six purposes to accomplish the mission which are to:

- 1. Provide academic programs for adult learners that have been developed and assessed by faculty, staff, and members of educational, professional and business communities.
- 2. Provide intensive and comprehensive instruction using a principally online mode of delivery that strengthens student academic achievement.

- 3. Instill in its students the value of lifelong learning by stimulating intellectual curiosity, creative and critical thinking, and awareness of culture and diversity.
- 4. Plan and provide facilities and resources that respond to the needs of students, faculty and staff.
- 5. Assist students in developing professional attitudes, values, skills and strategies that foster success in their careers and in life.
- 6. Prepare students to advance their employment goals and opportunities and meet the everchanging needs of their communities now and in the future.

To ensure the success of these outcomes, students, faculty and advisory board members provide ongoing feedback to the University. Students complete course evaluations at the end of each course. In addition, programmatic accreditation provides new insight and structure for many programs, including medical assisting and pre-licensure nursing degrees. During interviews conducted by the review team, it was noted that most Kaplan staff have been retained through this transition and some position titles or roles have shifted to support the new structure of Purdue Global.

The review team finds the standards are met for section B.

Standard C: Degree Requirements

- 1. The institution awards degrees, only upon successful completion of the courses or programs of study, and degree requirements to be met are specified in writing.
- 2. The institution's semester hour requirements for degree completion meet the following minimums:

Associate Degree - An Associate degree requires a minimum of 60 semester hours or 90-quarter hours. The Associate of Arts degree shall include a minimum of 36 semester hours or 54-quarter hours in general education courses.

The Associate of Science degrees shall include a minimum of 15 semester hours or 23-quarter hours in general education courses.

Baccalaureate Degree - A Baccalaureate degree requires a minimum of 120 semester hours or 180-quarter hours.

Master's Degree - A Master's degree shall require a minimum of 30 semester hours or 45 quarter hours beyond the Baccalaureate.

Doctoral Degree - A Doctoral degree shall require a minimum of 60 semester hours or 90-quarter hours beyond the Baccalaureate in addition to the dissertation. Decisions will be made on a case-by-case basis for institutions using a non-traditional approach instead of semester hours or quarter hours to determine degree completion.

Throughout its University catalog (which is provided to every student and also available online) the degree requirements for all of the programs in the Purdue Global portfolio are specified in writing. These requirements are organized at the undergraduate and graduate level with the

notation that specific programs may include additional degree requirements, which have been developed in line with accreditation standards. The interview process confirmed that academic degrees are only awarded upon the successful completion of the course of study.

Purdue Global has clearly outlined guidelines for the amount of academic credit that is limited to prior learning credit as well as the amount of credits that must be completed at Purdue Global. Because the majority of programs at Purdue Global use a quarter hour system, they have defined the conversion for students in the degree requirements at each program level.

The review team finds the standards are met for section C.

Standard D: Admissions Requirements

- 1. Purdue Global has a written policy defining the minimum requirements for admissions and for acceptance at the specific degree level or into the specific degree program proposed by the institution, consistent with criteria established by the appropriate regional or nationally recognized specialized accrediting agency.
- 2. Purdue Global has admissions policies that include detailed attention to the standards for academic credit given for experience, and the criteria for transfer credit.
- 3. Purdue Global has a written policy detailing the criteria and procedure to be followed in providing for a refund of tuition and fees.

Purdue Global has clearly written admissions policies, which include specific program policies in its admissions materials and institutional catalog. They also have clear policies for obtaining prior learning credit at both the undergraduate and graduate level in addition to policies for obtaining transfer credit.

A clearly written statement detailing the policy and procedures for refunding tuition and fees is available to students. The refund period and corresponding percentage of payment is outlined as well as the process student must adhere to for withdrawing from courses and receiving a refund. Furthermore, the policy outlines the process for returning Title IV financial aid and military assistance.

The review team finds the standards are met for section D.

Standard E: Academic Programs

1. Purdue Global has an educational program and curriculum that reflects the philosophy, purposes, and objectives of the institution.

- 2. Purdue Global has a written policy describing its system for evaluating student performance, the minimum performance considered satisfactory, and the criteria for academic probation and conditions for dismissal for unsatisfactory performance.
- 3. Purdue Global has procedures for the evaluation of the quality of programs of instruction and specific courses are clearly stated in writing.
- 4. Purdue Global's programs of study consist of planned educational experiences to meet the stated objectives and include attention to the necessary prerequisites, required courses, and appropriate progression.

Purdue Global offers students over 180 programs at the undergraduate, graduate and doctoral levels. The website lists the offerings specifically available at both locations in Maine. The delivery platform for these programs is primarily online but in Maine the Prelicensure Bachelor of Science in Nursing Program has clinical coursework completed by students at the Augusta location and the Medical Assistant Certificate has coursework completed at both Maine locations.

The educational programs offered by Purdue Global focus on the working adult. With regional campuses located across the country, and two in Maine, the academic experience and support services clearly reflect their philosophy and institution's purpose. Policies are in place to evaluate the student academic performance (including progression and dismissal) and interviews indicated that weekly meetings are held to monitor student progress at the Maine locations.

The procedures for evaluation of student performance are well articulated. Each of the academic programs offered by Purdue Global is scheduled to be reviewed every three years and individual courses are scheduled for review on an 18 month cycle. The assessment model, Course Level Assessment (CLA) supports the progression of attainment for program-level student learning outcomes. The CLA platforms allows faculty to implement student assessments and analyze performance data that can be used to identify necessary interventions to better support student success. The system helps enforce the curriculum sequence and prerequisite course expectations for the degree programs. The data also helps ensure that Purdue Global offerings are equivalent in rigor whether delivered online or in face-to-face formats.

The review team finds the standards are met for section E.

Standard F: Faculty

- 1. The preponderance of faculty members provide instruction and possess academic, scholarly, and teaching qualifications appropriate to their respective positions and teaching assignments and are distributed in such a way that all students benefit from these qualifications.
- 2. The faculty is involved in developing, implementing, and evaluating the curriculum for all degree programs to assure quality learning experiences are provided for all students.

3. The faculty participates in the governance of the institution and the academic programs as well as in short-term institutional planning activities.

Faculty members possess all of the necessary qualifications respective of their positions and assigned course loads. The University adheres to the standard that faculty must possess an academically relevant degree at least one level higher than the course levels they are assigned to teach except in terminal degree programs or in specialty areas where it has been determined that equivalent experience has been established. As was evident in reviewing selected faculty CVs, there was a wide range of academic backgrounds that suffice in offering depth and breadth of perspective to the academic programs.

Discussions with Purdue Global faculty verified that they are actively involved in developing, implementing, and assessing the curriculum for their specific degree programs to assure appropriate student learning outcomes and performance. The visiting team reviewed the faculty CVs, and confirmed they were appropriately credentialed to teach their assigned courses. Purdue Global faculty participate in governance issues, designing academic programs, and accreditation processes in addition to their teaching, service and scholarship expectations.

The University has a process in place to ensure courses taught by various part-time and full-time faculty members in both on-line and face-to-face formats have comparable quality. Full-time faculty members are expected to develop an annual development plan. In addition, they are evaluated annually and the process includes classroom observations, student evaluations and student performance measures. Adjunct faculty members receive a review during their first term and annually after that time.

The review team finds the standards are met for section F.

Standard G: Student Services

1. Students are provided with, and have access to, a system of educational, career and personal advising services.

Purdue Global provides career services, guidance, academic support services, financial aid, student activities and additional resources for students both on and off campus. Career services at Purdue Global are available for all students and eligible graduates. The focus of the Career Services Team is to help students understand the importance of occupational exploration, decision making, goal setting, networking, the job search, and developing productive connections in the workplace. Staff assist students with job searches, resume and cover letter review, interview preparation, decision making and job offer negotiations. Students have access to career resources 24/7 through an online platform. Career Services also has the capability to support students remotely, if students are unable to come to the campus. In addition to the supports listed in the initial application, an informational board on campus is updated with open positions for job seekers.

The University offers support services to students to help meet their educational goals. If the University determines that students require additional professional assistance, it will refer outside counselors or agencies. During the review committee interviews, staff explained that a help hotline is available for students at no cost and community partners can be accessed for students requiring additional support services.

Purdue Global offers activities and student organizations for degree-seeking students and alumni. In addition, cooperative learning and group work is emphasized as an important component of the academic experience. Purdue Global has developed policies and procedures for maintaining campus security. Purdue Global complies with the Drug-Free Workplace Act of 1988 and the Drug Free Schools and Communities Act Amendment. During the matriculation process, students are provided with information packets detailing University policy.

Purdue Global provided documents as evidence of ADA compliance. All faculty receive ADA training and have copies of the PG-180: Accommodating Students with Disabilities Policy. Students with disabilities or who require special accommodations are invited to contact the Center for Disability Services (CDS), located in Fort Lauderdale, Florida. The student must voluntarily self-disclose his/her disability and need for accommodations in order to be referred to the CDS. Through interviews conducted, staff confirmed that they receive training and are made aware of specific accommodations for students on a need to know basis. Accommodations mentioned included, but were not limited to, extra time, an individual testing environment, readers, and relay services. In addition to services available on campus, Purdue Global adheres to ADA compliance online.

Students at Purdue Global are assigned an academic advisor from the time of enrollment to graduation. The current student-advisor ratio is 150:1. Academic advisors are responsible for tracking academic progress, connecting with students at specifically identified times throughout the academic year, supporting programmatic changes and ensuring that students have sufficient support to be successful. Each advisor utilizes a dashboard to track student attendance, document outreach efforts, monitor registration, and review progress in classes. Purdue Global staff presented additional evidence of this process in the form of dashboard screenshots. Faculty explained that weekly retention meetings are held to review grades and track student progress. These meetings bring together a team of staff to review data and identify necessary supports. As part of this process, advisors may refer advisees to tutoring services or other interventions.

Upon enrolling at Purdue Global, students are assigned a financial advisor. This advisor supports students in the financial aid process throughout their enrollment at Purdue Global. Financial services are available both on site and remotely. Advisors work closely with students to determine resources available. These include, but are not limited to, Title IV funding, FAME, and Maine state grants. Financial aid documentation is also linked to the student dashboard for academic advising purposes.

Academic support is available to students both on campus and remotely. Staff and faculty hold office hours for students on campus. In addition, faculty are available online to support students. Cranium Café is one example of a program which allows the student and tutor online editing capabilities. Purdue Global also has identified specific peer tutors who have demonstrated

excellence in programs and schedule sessions for them to work with students needing remediation sessions.

The review team finds the standards are met for section G.

Standard H: Library and Learning Resources

The institution maintains and provides ready access to library and learning resources, virtual and/or physical, that are adequate and appropriate for student achievement of stated program goals and objectives.

As a primarily online University, Purdue Global recently made the decision to eliminate their physical library resources; however, they have a significant number of online resources. The main source of library information resources come from third party online databases. For example, Purdue Global students have access to Medline Complete (medical research with more than 2,100 journals) and Academic Search Complete (over 9,000 journals covering a "broad range of important areas of academic study, including anthropology, engineering, law, sciences and more"). Purdue Global administrators noted that: "The Library facilitates access to over seventy databases, over 200,000 e-books, and a robust collection of thousands of scholarly journals, magazines, newspapers, and other periodicals."

Faculty shared during the interview process that they had support and access to the instructional resources necessary to design and teach their courses. Faculty also described an organized process where they coordinate their course content with librarians to manage resources needed by students to successfully complete their courses.

Modern university libraries are more than just a collection of books and online resources. Libraries are expected to have support services. Purdue Global provides many addition services, as noted in their Application for Authorization, such as, a writing center, math center, technology center, and business center each of which provides instructional support and tutoring.

Similar to Purdue Global's decision to remove physical library resources, they have also analyzed the need for physical (live) academic tutoring services. Results of that review indicated that Purdue Global students prefer the new online academic support services over the traditional live services.

The review team finds the standards are met for section H.

Standard I: Facilities

The institution provides and maintains an appropriate learning environment with the necessary supports and technologies sufficient for student achievement of educational objectives. In doing so, industry standards for health, safety, and maintenance are followed.

Purdue Global is primarily an online provider of education; however, they have two physical locations within Maine. One location in Lewiston (13,000 square feet) and another in Augusta

(20,130 square feet). These facilities are used to provide student support services, administrative offices, and specialty classroom laboratories. The Augusta campus has been recently renovated to accommodate a "state of the art" nursing simulation lab, "including high-end simulation manikins–VitalSim® and SimMan3G®".

The Augusta facility is in excellent condition. The building offers all the modern/expected conveniences of an extension campus. The review committee did not perform a site visit at the Lewiston facility.

Prior to the purchase of Kaplan by Purdue Global, Kaplan operated from a third location in Portland. The Portland location was recently closed. Purdue Global administrators indicated that the Portland lease was up for renewal and at that time they decided they didn't have a need for the extra space because the Lewiston facility was meeting their current needs.

Purdue Global extends the use of their facilities to their Maine communities by allowing city and community organizations to meet in their conference rooms. Purdue Global is also engaged with the Maine communities through collaborations, such as, the Augusta city police and fire department mock mass-casualty incident events. Purdue Global also has plans to embed some of their academic programs into area hospitals and/or businesses; thus, extending their physical footprint in Maine and meeting a critical need for our citizens.

An item of interest emerged as a result of this review. Both of the Maine locations described above are leased. The Lewiston lease is due 3/31/2021 and the Augusta is due 9/30/2019. Purdue Global representatives indicate that they review lease agreements 6-9 months prior to their due dates and reinforced their intent to remain in Maine. Purdue Global noted they prioritize their obligations to students and would ensure a thoughtful teach-out plan should any changes be considered regarding ground locations in the future. Many of the student programs are 2 to 4 years in length. Meaning, students signing up for programs that have required elements of these local facilities have no guarantee the facilities will be available for the term of their programs. Purdue Global administrators did confirm they intend to maintain both Maine locations in their portfolio.

The review team finds the standards are met for section I.

Standard J: Financial Resources

- 1. The application for establishment of a new degree-granting program documents a complete and realistic plan for implementing and financing the proposed academic program during the first five-year cycle of operation. The plan is based on reasonably projected enrollment levels; the nature and extent of instructional services required; the availability of existing resources to support the program; additional resource requirements; and projected/committed sources of funding.
- 2. The application from an existing degree-granting institution clearly documents that it has the financial resources necessary to support its purposes, implement its program and maintain its continuity for a minimum of five years by providing its most recent audited financial statement, and that evidence exists of long range financial planning.

Purdue Global was formed from the purchase of Kaplan University by Purdue University in 2017. The acquisition occurred mid-year, which creates the need for a partial year financial statement in the first year. Additionally, Purdue Global's audited financial statements for the current year were not available until June 30, 2018; therefore, the audited financial statements provided in June 2018 were the 2017 audited financial statements for Kaplan University. Purdue University agreed to purchase Kaplan University in April 2017; however, the acquisition was not executed/closed until March 2018 at which time KU became PG.

Because of the transitionary challenges created by the acquisition and the fact that Purdue Global has campuses across the country, Purdue Global also provided an unaudited Profit and Loss statement specific to Maine. Kaplan University and subsequently Purdue Global have presented audited and unaudited documents that indicate they are financially sound. The financial information provided combined with the fact that Purdue Global's consolidated composite score was a 2.5 is sufficient to determine that the institution has the financial resources necessary to support its purposes. The consolidated composite score is a measure that combines the equity ratio, primary reserve ratio, and net income ratio to form a complete financial strength indicator that ranges from -1 to 3; 3 being very financially sound.

Prior to the purchase of Kaplan by Purdue University, Kaplan's Consolidated Balance Sheet, as of December 31, 2016, indicates they had \$195,678,000 in Total Current Assets, compared to \$138,627,000 in Total Liabilities. Kaplan's Consolidated Statement of Operations, Year Ended December 31, 2016, indicates that Kaplan spent 20.1% of their (\$579,717,000) Total Operation Expenses on (\$116,799,000) Educational Services. Kaplan's Consolidated Statement of Operations, Year Ended December 31, 2016, also shows a positive Net Income of \$24,379,000. The financial amounts referenced are those of Kaplan Higher Education, LLC and Subsidiaries and are the consolidated financial statements of Kaplan University's parent company.

The purchase of Kaplan by Purdue University, which was announced in 2017 but not completed until March of 2018, allowed for the new entity (i.e., Purdue Global) to be formed as a non-profit organization. Kaplan's Consolidated Statement of Operations, Year Ended December 31, 2016, indicates they recorded \$12,178,000 in taxes that will not have to be paid or greatly reduced in the future; thus, strengthening Purdue Global's position.

During the review, three items of interest emerged. The first is that the U.S. Department of Education placed Kaplan University on provisional certification status until September 30, 2018. An excerpt from Kaplan University's 2016 audited financial statements states:

"On February 23, 2015, the Department began a review of Kaplan University. The review will assess Kaplan's administration of its Title IV, HEA programs and will initially focus on the 2013 to 2014 and 2014 to 2015 award years. On December 17, 2015, Kaplan University received a notice from the ED that it had been placed on provisional certification status until September 30, 2018, in connection with the open and ongoing ED program review. The U.S. Department of Education has not notified Kaplan University of any negative findings. However, at this time, Kaplan cannot predict the outcome of this review."

The second item of interest was that their 5-Year Plan and Statement of Operations have significant differences in the percent of Education and Administrative expenses. Purdue Global administrators have indicated that these differences are caused by the way the Education and Administrative expenses where categorized and not from substantive changes in operations.

The third item of interest was that Kaplan University had a significant amount of Goodwill (182,596,000 out of 417,090,000 total assets in 2016). The acquisition of Kaplan University by Purdue Global may have an impact on their Goodwill that could cause an impairment. Kaplan University was able to provide the review team with an updated set of Audited Financial Statements in July 2018. Kaplan University is a subsidiary of Kaplan Higher Education LLC and Kaplan Higher Education LLC is a subsidiary of Kaplan, Inc. The Audited Financial Statements include Consolidated Financial Statements for Kaplan Higher Education LLC and Condensed Financial Statements for Kaplan University. Because consolidated financial statements refer to the Kaplan Higher Education LLC, this review focused on the Kaplan University Condensed Financial Statements.

There were no substantive changes between the previously reviewed December 2016 Consolidated Financial Statements and the current December 2017 Consolidated Financial Statements; however, there were four items of note.

First, the new Financial Statements contain more information on the purchase arrangement between Purdue Global and Kaplan University. This information outlines agreements that benefit both parties and serve to strength the organization. For example, the auditors describe, "If Purdue University Global achieves cost efficiencies in its operations, then Purdue University Global may be entitled to an additional payment equal to 20 percent of such cost efficiencies (Purdue Efficiency Payment). (Audited Financial Statements, 2018).

The second item of note is that there was a 22% reduction in total current assets, from year end 2016 at \$182,743,000 to year end 2017 at \$142,072,000; however, there was also an 8% reduction in total operating expenses, from year end 2016 at \$519,820,000 to year end 2017 at \$475,256,000.

The third note and follow-up from the original review of Kaplan University's Condensed Financial Statements is that there was indeed a significant reduction (44%) in provision for income taxes, from year end 2016 at \$24,743,000 to year end 2017 at \$13,837,000. The final note and follow-up from the original review of Kaplan University's Condensed Financial Statements is that there was no change in Goodwill between periods. The information provided and review of Kaplan University's December 2016 Condensed Financial Statements and December 2017 Condensed Financial Statements is sufficient to determine that the institution has the financial resources necessary to support its purposes and provides reasonable evidence of financial solvency.

The review team finds the standards are met for section J.

III. CONCLUSION AND RECOMMENDATION

Having reviewed the report and supporting documentation, in addition to conducting interviews of the standards for both Chapter 149 and Chapter 170, the visiting team recommends that the Maine State Board of Education accept the team report and approve the Purdue Global application.