

APPROVED

November 13, 2024

Melissa Bealon

Board Secretary Melissa Bealon

Item #F-2

November 13, 2024

**NEW OPERATING AND/OR DEGREE-GRANTING AUTHORITY
FOR INDEPENDENT INSTITUTIONS**

Submitted for: Action.

Summary: New independent institutions, institutions planning to operate at a new location, including a location outside the higher education region of the original operating authority, and out-of-state institutions planning to operate in Illinois for the first time are required to obtain authorization to operate. These institutions are also required to obtain authorization for each new degree program.

Action Requested: That the Illinois Board of Higher Education approves the recommendations to grant degree-granting authority and/or operating authority to the following institution:

Not-For-Profit

Lewis University

- Associate in Applied Science in Radiography in the West Suburban Region

Roosevelt University

- Operating Authority in the Fox Valley Region

STATE OF ILLINOIS
BOARD OF HIGHER EDUCATION

**NEW OPERATING AND/OR DEGREE-GRANTING AUTHORITY
FOR INDEPENDENT INSTITUTIONS**

The Illinois Board of Higher Education (IBHE) has responsibility for administration of The Private College Act (110 ILCS 1005) and The Academic Degree Act (110 ILCS 1010). Under these statutes, new independent institutions, institutions planning to operate at a new location, including a location outside the higher education region of original operating authority, and out-of-state institutions planning to operate in Illinois for the first time are required to obtain authorization to operate. These institutions also are required to obtain authorization for each new degree program.

Applications for new operating and degree-granting authority submitted by independent Illinois institutions and out-of-state institutions are reviewed by the staff. Recommendations are developed by applying criteria for operating and/or degree-granting authority, which are defined in the rules adopted for administration of the statutes and Board policies on assessment of student learning and specialized accreditation requirements for student licensure. These criteria encompass educational objectives, institution and degree titles, curricula, facilities, faculty and administrator qualifications, student policies, publications, records, compliance with pertinent laws, and fiscal stability. Staff recommendations are based on analyses of application materials, responses to questions, and site visits. Out-of-region sites are defined as sites located within an IBHE approval region other than the region within which an institution's original operating authority was granted. There are ten IBHE approval regions; each is coterminous with one or more community college districts. Approval to operate within a new approval region entitles an institution to operate throughout the region, and not solely at the site at which the institution initially applied. In addition to the approval criteria in rules, each new program was reviewed for its contributions to the goals of *A Thriving Illinois: Higher Education Pathways to Equity, Sustainability, and Growth*, which sets forth new priorities to guide Illinois higher education. Staff recommendations are based on analyses of application materials and responses to staff questions.

Not-For-Profit Executive Summary

Lewis University

- Associate in Applied Science in Radiography in the West Suburban Region

Lewis University (Lewis or the University) requests authorization to offer an Associate in Applied Science (AAS) in Radiography in the West Suburban Region. The proposed program provides students with a pathway to certification and employment in the field of radiography. The AAS in Radiography requires students to complete 84 semester credit hours, which includes 13 hours in general education and 70.5 hours in radiological technology. Lewis University's radiography program will have a clinical competency plan that incorporates the American Registry of Radiologic

Technologists (ARRT) competency requirements. Clinical instruction provides opportunities to gain clinical experience and achieve competencies through rotations in various clinical environments. Clinical assignments are designed to provide students with experience to achieve specific performance objectives, utilize previously learned skills and achieve the desired competency level. Graduates will be prepared to sit for the American Registry of Radiologic Technologists certification in radiography. There are policies in place to ensure faculty members possess the training, credentials, and qualifications to provide instruction in the proposed program. The University has sufficient library, technology, staff, and financial resources in place to support the proposed program.

Approval request summary, including staff conclusion, follows in Attachment X.

Roosevelt University

- Operating Authority in the Fox Valley Region

Roosevelt University (Roosevelt or the University) is a private, nonsectarian, not-for-profit institution of higher education located in Chicago, which was founded in 1945, with a commitment to social justice and an emphasis on fairness, equality, and integrity. The main campus for Roosevelt is located in downtown Chicago with an additional campus in Schaumburg. On March 9, 2020, Roosevelt acquired Robert Morris University, another private institution in the Chicago Region. Roosevelt is recognized as a grandfathered institution in its home regions of Chicago and North Suburban by the Illinois Board of Higher Education (IBHE) and consequently is exempt from many aspects of the IBHE oversight. On September 25, 2012, Roosevelt University sought and obtained IBHE authority to operate and grant the Bachelor of Science in Hospitality and Tourism Management in the West Suburban Region. On April 30, 2020, Roosevelt University sought and obtained authorization to operate in the Central Region to teach students in Robert Morris University's Central Region location following the acquisition. On June 8, 2021, the University sought and obtained authorization to operate in the South Metro Region. The University offered limited, less than 40 percent, programmatic face-to-face instruction for existing online degree programs emanating from its main campus in partnership with Joliet Junior College and the South Cook Intermediate Service Center.

With this application, Roosevelt University is seeking authorization to operate in the Fox Valley Region. The University entered into an agreement with McHenry County College (MCC) to provide MCC students, alumni, and other residents for Community College District 528 to take bachelor's and graduate level courses and programs in the community in which they live through the MCC University Center. Roosevelt plans to offer bachelor's degree completion programs for human resource management, finance, marketing, criminal justice, graphic design, and a Master of Business Administration. Pending IBHE authorization for operation in the Fox Valley Region, Roosevelt will then seek degree-granting authority for the proposed programs. There are policies in place to ensure faculty members possess the training, credentials, and qualifications to provide instruction. The University has sufficient library, technology, staff, and financial resources in place to support the proposed operations.

Roosevelt University was built on diversity, acceptance, and the possibility of opportunities. The University has earned the designation of a Hispanic Serving Institution and a Minority Serving Institution. According to the National Center for Educational Statistics' Integrated Postsecondary

Education Data System, in fall 2022, the University enrolled 3,725 students with approximately 65 percent of students pursuing undergraduate education. The University educates a diverse range of students (29 percent Hispanic, 19 percent Black or African American, and three percent are two or more races), 65 percent female and 48 percent Pell-grant eligible at the undergraduate level. The University partnership with MCC plans to recruit non-traditional students for the targeted programs. The University has provided proactive retention plans to support students, including those previously overlooked by higher education. The University will provide wraparound student support services as well as partnering with MCC for additional on-ground services. The program's goal is to bring bachelor's degree programs to the community so that students have access to higher education, aligning with the IBHE Strategic Plan, *A Thriving Illinois*.

Approval request summary, including staff conclusion, follows in Attachment X.

The staff recommends adoption of the following resolutions:

The Illinois Board of Higher Education hereby grants to Lewis University authorization to grant the Associate of Applied Science in Radiography in the West Suburban Region, subject to the institution's implementation and maintenance of the conditions that were presented in its application and that form the basis upon which this authorization is granted.

The Illinois Board of Higher Education hereby grants to Roosevelt University authorization to operate in the Fox Valley Region subject to the institution's implementation and maintenance of the conditions that were presented in its application and that form the basis upon which this authorization is granted.

Lewis University
One University Parkway
Romeoville, IL 60446
President: Dr. David Livingston

Proposed Program Title in the Region of Authorization: Associate of Applied Science in Radiography in the West Suburban Region

Projected Enrollments and Degrees

First Year Enrollment	Fifth Year Enrollment	Degrees Awarded Fifth Year
15	35	40

Institutional Accreditation: Lewis University is accredited by the Higher Learning Commission (HLC).

Background and History

Lewis University (Lewis or the University) is a private, non-for-profit institution built on the tradition of career preparation and liberal arts education. The University was founded in 1932 under the direction of the Chicago Catholic Archdiocese and Bishop Bernard J. Sheil. The school was incorporated in 1934 as Lewis Holy Name Technical School and was originally a school for boys, with an initial enrollment of 15 students. In 1935, it became Lewis Holy Name School of Aeronautics and was later changed to Lewis College in 1962. The University became a co-educational school in 1951. Currently, the University enrolls 6,700 students in 80 undergraduate majors and programs of study, 35 graduate programs, and two doctoral programs. The School of Radiologic Technology, which was approved for training on November 1, 1945, and began with only minimal formal academic work, has now progressed to graduating eight to ten students annually. The program has evolved beginning with a name change to the Saint Francis School of Radiography, as technology has also evolved. In 1977, the name radiologic technicians was changed to radiologic technologists by the American Society of Radiologic Technologists and further to be identified as radiographers.

In July 2015, the Saint Francis School of Radiography program partnered with Oak Point University (formerly Resurrection University) to advance the profession of Imaging Technology. In April 2024, Oak Point University announced its closure, and Lewis University opted to absorb the remaining students. Prior to the institutional closure, Oak Point University had received an eight-year maximum accreditation with the Joint Review Committee on Education in Radiologic Technology (JRCERT) on its last accreditation visit. Lewis University received approval from JRCERT for a transfer of sponsorship from Oak Point University to Lewis University (Oakbrook Campus) for the baccalaureate degree radiography program approved by IBHE in August 2024. The program has six months to complete an intensive self-study report and schedule an onsite visit by the accreditation body. Lewis University will be prepared for these accreditation activities because Lewis hired all the Oak Point University Radiography faculty.

The proposed AAS in Radiography aligns with Lewis University's mission and strategic plan. Lewis University, guided by its Catholic and Lasallian heritage, provides to a diverse student population a liberal and professional education grounded in the interaction of knowledge and fidelity in the search for truth. A central pillar of Lewis University's current strategic plan, "Students

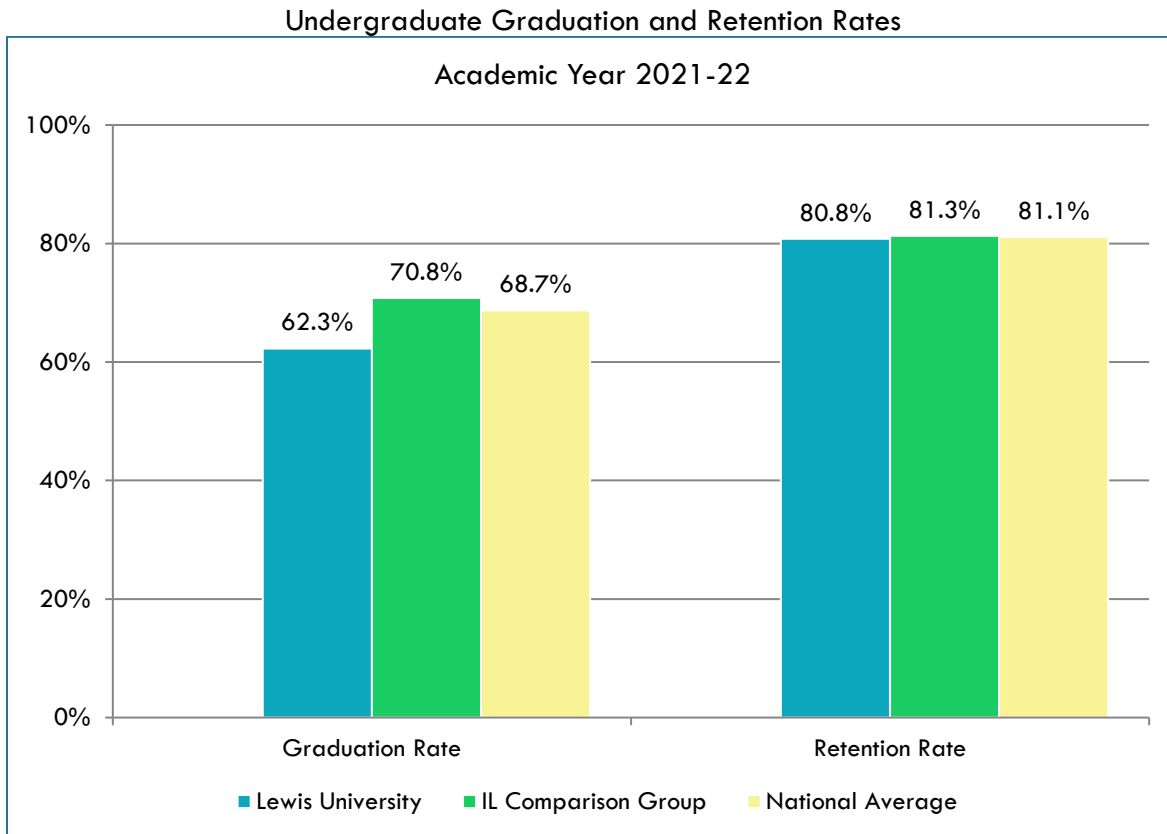
at the Center...For a Better World” is “meet students where they are,” which commits the University to offering a “expanded range of programs . . . that are aligned with the needs of the external community and supportive of their goals, talent objectives, and workforce development.”

Institutional Data

1030.30(a)(3)(F): Success in student progression and graduation across all existing approved programs, and success rates in programs preparing students for certification and licensure, shall be consistent with expectations in higher education and the appropriate related field of study. At a minimum, the Board shall consider the following factors, based on results for similar institutions: (i) Graduation rates, certificate and degree completion rates, retention rates, and pass rates for licensure and certification aligned with thresholds set by State or national regulatory bodies; and (ii) Success rate, which shall be, at a minimum, higher than that of the lowest quartile of these measures for similar Illinois institutions defined as open versus competitive enrollment institutions and primarily associate versus primarily baccalaureate granting institutions. Exceptions may be made to the lowest quartile if an institution is above the national average for these measures using the same comparison categories of institutions.

1030.30(a)(3)(G): Additional student success measures shall be considered in the review of applications for authorization. The Board shall establish minimum rates of success based on results for similar institutions or thresholds set by State or federal regulatory bodies. i) At a minimum these data shall include student loan default rates, student indebtedness rates, job placement rates, student learning measures and other success indicators. ii) Institutions that participate in Federal Student Loan programs shall have 3-year Official Cohort Default rates no higher than 25 percent. Institutions with Federal Financial Responsibility Composite Scores shall have a score that is no lower than 1.0. Institutions that fail to meet these thresholds may be restricted from implementing new certificate or degree programs. iii) The success rate shall be, at a minimum, higher than that of the lowest quartile of these measures for similar Illinois institutions defined as open versus competitive enrollment institutions and primarily associate versus primarily baccalaureate granting institutions. Exceptions may be made to the lowest quartile if an institution is above the national average for these measures using the same comparison categories of institutions.

This section includes information about institutional and student success measures for each institution seeking program approval. The institution’s rates will be compared to Illinois institutions from within a select comparison group and against the national standards or averages. For a proposed undergraduate program, this section will include undergraduate graduation rates, first to second year retention rates, student loan default rates, and any applicable licensure passage rates. For a proposed graduate program, this section will primarily focus on student loan default data since this measure also includes graduate students in the calculation.



Source: National System for Education Statistics (NCES), US Department of Education

Note: Lewis University is in the four-year, selective Illinois comparison group.

Higher percentages are positive indicators.

Undergraduate Graduation Rate

The graduation rate measures the rate at which entering freshmen graduate within 150 percent of normal program length. Data is provided for six-year graduation rates for first-time, full-time bachelor's degree-seeking students and three-year graduation rates for full-time associate degree-seeking students. The national standard for graduation rates is reported annually by the National Center for Education Statistics (NCES).

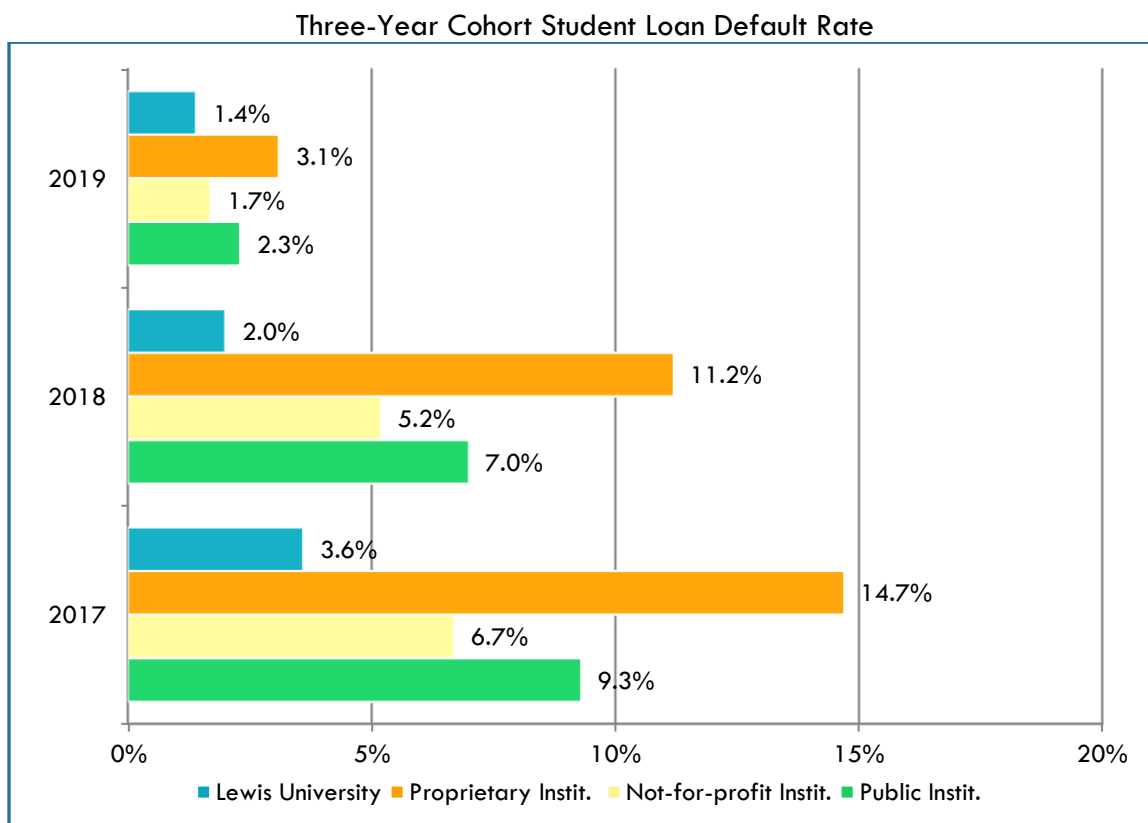
Undergraduate Retention Rate

Retention rates examine the percentage of first-time degree seeking students enrolled in the fall of the prior year that are still enrolled in the fall of the current year. The national standard for retention rates is reported annually by NCES.

Undergraduate Completions per 100 Full-Time Equivalent		
Academic Year 2021-22	Lewis University	Comparable Illinois Institutions
	29	24.4

The full-time equivalent (FTE) data is a unit of measurement intended to represent one student enrolled full-time for one academic year. The calculation is based upon credit/contact hours

offered at an institution divided by a standard minimum (12 credit hours) full-time course load. The completions per 100 FTE data are included to provide a holistic view of completion across different student populations.



Source: National Center for Education Statistics (NCES), US Department of Education

Note: Due to the pause on federal student loan payment that began in March 2020, the cohort default rate for fiscal year 2020 is zero percent for the institution and all institution types. The national cohort default rate for fiscal year 2019 was 2.3 percent and zero percent for fiscal years 2020 and 2021. A lower number is a positive indicator.

The three-year cohort student loan default rate is the percentage of a school's borrowers who enter repayment on certain Federal Family Education Loan Program or William D. Ford Federal Direct Loan Program loans during a particular federal fiscal year, October 1 to September 30, and default or meet other specified conditions prior to the end of the second following fiscal year.

Need

Public Act 102-1046, 110 ILCS 1005/4, Sec. 4 (7): That the proposed degree program is educationally and economically consistent with the educational priorities and needs of this State and meets a need that is not currently met by existing institutions and is supported by clear evidence of need. If the examination shows that the applicant has such qualifications a certificate of approval shall be issued.

Careers in radiologic technology are in demand and may economically elevate individuals and their families. Based on the data available from the U.S. Bureau for Labor Statistics, the median pay for radiologic technologists is \$76,020 with a six percent projected growth outlook for the

period of 2022 to 2032. Approximately 264,100 job openings are projected each year in radiologic occupations due to emerging career trends and the high need to replace workers who transfer to different occupations or exit the labor force. According to the Illinois Department of Employment Security, the need for radiologic technologists is expected to increase above four percent by 2030.

Illinois Employment Projections, 2020-2030						
Radiologic Technologist Occupations						
Occupation Title	Employment 2020	Employment 2030	Employment Change (%)	Average Annual Job Openings Due to...		
				Growth	Replacements	Total
Radiologic Technologists (29-2034)	8,760	9,152	392 (4.5%)	39	629	668
All occupations	6,044,269	6,542,650	498,381 (8.3%)	49,838	676,151	725,989

Source: Illinois Department of Employment Security

Associate degree programs account for the majority of radiologic technology programs in Illinois and nationally. Additionally, the demand for radiography programs in Illinois has grown with enrollment up by 6.5 percent over the last five years. According to data from the Illinois Board of Higher Education program inventory, there are three approved Radiologic Technology/Science (51.0911) programs at two independent institutions in Illinois. There is only one AAS in Radiography program in the West Suburban Region.

Comparable Programs		
Institution	Degree	Region
Midwestern Career College	A.A.S. in Diagnostic Medical Imaging Radiography	West Suburban
Midwestern Career College	A.A.S. in Diagnostic Medical Imaging Radiography	Chicago
Trinity College of Nursing & Health Sciences	A.A.S. in Radiography	Western

Source: IBHE Program Inventory

A Thriving Illinois: Higher Education Paths to Equity, Sustainability, and Growth

The proposed AAS in Radiography supports Goal 1, Equity, of *A Thriving Illinois* to close the equity gaps for students who have historically been left behind. For Spring 2024, Lewis University's racial and ethnic student profile was comprised of 44 percent White, 18 percent Hispanic, 5 percent Asian, 6 percent African American, 0.2 percent American Indian or Alaska Native, 0.2 percent Native Hawaiian or other Pacific Islander, with the remaining students identifying as two or more races or did not report their racial or ethnic background. 20.9 percent are non-resident alien. The radiography program at Oak Point University served mainly adult students with an average age of 31. Following the Oak Point University closure and incorporation into Lewis University, those student enrolment demographics are expected to continue.

Lewis University has a long history of serving adult, returning students and is dedicated to student success measurable by degree completion and career attainment. The proposed program

will serve both adult and traditional students with similar demographic backgrounds. The University has defined goals for student academic outcomes, specifically student retention, persistence, and graduation rates for all its degree programs and routinely tracks the retention, persistence, and graduation rates of students. The process to set and define the institutional goals for student retention, persistence, and graduation rates for the undergraduate and graduate programs at Lewis University is integrated and inclusive, with recommendations, input, and feedback from various constituencies of the University, including leadership, administration, faculty, staff, and students. National benchmarks on one-year retention rates and 150 percent graduation rates are also used for reference to determine the retention and graduation goals. The provost, in consultation with the Performance Indicator Review Committee, utilizes this data to set and monitor short-term and long-term goals for retention, persistence, and graduation. Institutional goals are shared with the University as a whole and the Board of Trustees in the form of key performance indicators. The one-year retention rate and 150 percent graduation rate of the undergraduate first-time, full-time degree-seeking students are also key performance indicators of the Board of Trustees, elevating them to the highest importance.

Lewis University places great emphasis on student retention and graduation and strives to retain as many students as possible and support them to complete their academic programs in a timely manner. The Office of Institutional Research and Planning monitors and tracks the retention, persistence, and graduation rates of both undergraduate and graduate students and reports the findings to the provost and college deans each semester. Additionally, enrollment and credit hour production for fall and spring are compiled to provide additional data points for targeted student success measures. This data enables Lewis to allocate its resources accordingly based on need.

Lewis University provides academic and other support services, as well as professional advising for all students. Resources from the Center for Academic Success and Enrichment (CASE) are available to all students, including tutoring through the online program, Brainfuse. Academic services are provided with equal access and opportunities for qualified students with disabilities to participate in and benefit from programs, services, and activities of the University. Additionally, the Office for Student Engagement and Multicultural Student Enrichment (SEMSE) is housed within the Brother James Gaffney Student Center. SEMSE provides weekly student engagement events, student leadership development, and multicultural programming and support. The overall goal of SEMSE is to provide a meaningful co-curricular student life experience that promotes a sense of belonging to the Lewis community for all students.

The proposed program will contribute to Goal 2, Sustainability, of *A Thriving Illinois*, to *build a stronger financial future for individuals and institutions by finding ways to reduce the financial burden of education on students and their families*. The proposed program will be offered to adult, non-traditional students at a tuition discount rate of up to 45 percent, thus making the program more accessible and affordable for students, especially underserved adult students. Based on the tuition discount, Pell and MAP-eligible students will have most of their cost of attendance covered by grants. All other fees are transparently communicated to students, including a general fee of \$160 per semester, and \$1,500 per academic year cost for books. Students may be eligible for deferred billing if their employer provides a reimbursement for tuition costs. Lewis University has established partnerships with employers to offer tuition discounts.

The proposed program will also contribute to Goal 3, Growth, of *A Thriving Illinois*, to *increase talent and innovation to drive economic growth*. The proposed AAS in Radiography program has established relationships with the largest Healthcare employers in Illinois, including Advocate Aurora Healthcare, Ascension Healthcare, Endeavor Healthcare, and Illinois Bone and Joint Institute. These employers are all clinical partners, have active seats on the advisory committee board and participate in strategies for future growth opportunities as well as feedback for current students. These organizations also allow the University to actively recruit students and in turn, they participate in annual job fairs to recruit graduates for their facilities. In addition to the concentration in entry-level radiography, students are introduced throughout the program to other imaging modalities that would be a career opportunity for them as a secondary pathway to complement their primary pathway in radiography. The program has interprofessional education threaded throughout the entire curriculum to promote better communication within healthcare delivery.

Mission and Objectives

Criterion 1030.60(a)(1) provides that the objectives of the degree program(s) must be consistent with what the degree program title(s) imply.

Criterion 1030.60(a)(2) provides that the requested degree program shall be congruent with the purpose, goals, objectives and mission of the institution.

Lewis University, guided by its Catholic and Lasallian heritage, serves a diverse student population and provides a liberal and professional education grounded in the interaction of knowledge and fidelity in the search for truth. Lewis University provides pathways to economic upward mobility by offering academic programs that lead to professions in which graduates thrive. Fundamental to its mission is a spirit of association that fosters community in all teaching, learning, and service. The proposed program is consistent with the purpose, goals, objectives, and mission of the University. The requested degree title reflects the program's objectives and curriculum.

Curriculum and Assessment

1030.30(a)(3): The caliber and content of each course or program of instruction, training or study shall be reasonable and adequate for achieving the stated objectives for which the course or program is offered. An undergraduate curriculum shall include general education in alignment with the degree level and objectives.

1030.60(a)(4): The caliber and content of the curriculum shall assure that the stated certificate or degree objectives for which the program is offered will be achieved.

Admission Requirements

Students interested in the proposed AAS in Radiography must have completed all general education and Imaging Technology prerequisites at a regionally accredited institution. Additional admission requirements include a minimum 2.00 GPA and completion of the Test of Essential Academic Skills (TEAS) exam with a minimum score of 60 percent overall and 60 percent in the science section. Applicants are expected to have good standing at previous colleges and universities.

Curriculum

The AAS in Radiography is a 84 credit hour program that includes 71 credit hours in radiologic technology and 13 credit hours in general education and support courses including college writing, anatomy and physiology, and Catholic and Lasallian heritage. The radiography program provides a well-structured curriculum that prepares students to practice radiography. Classes are structured for students to build on their radiography knowledge as they progress throughout the program. Students gain knowledge and structure throughout the program in theory and application in the classroom, simulation lab, and clinical settings. The program utilizes the American Society of Radiologic Technologists (ARRT) radiography curriculum plan, which has been established for several years and practiced while operating under Oak Point University. The ARRT certifies and registers technologists in a range of disciplines by overseeing and administering education ethics and examination requirements. In Illinois, both a license from the Illinois Emergency Management Association (IEMA) and a certification by the ARRT are required. To be granted IEMA certification, a candidate must pass the ARRT certification exam.

Lewis University provides academic and other support services and professional advising for all students. Each student is assigned a professional academic advisor who serves as their point of contact at the University. Academic advisors meet with students at least once each semester to discuss their course of study, any challenges they have encountered, and connect them with needed services. Academic advisors are available to students year-round, and their goal is to support students in the completion of their degree. Advisors also support students who have difficult semesters or may be placed on academic probation. Resources from the Center for Academic Success and Enrichment are available to all students including tutoring through the online program, Brainfuse. Academic services afford equal access and opportunities for qualified students with disabilities to participate in and benefit from programs, services, and activities of the University.

Assessment of Student Learning

Lewis University has established processes to measure and analyze student learning outcomes data. Lewis University's process of assessment is ongoing (formative), focused on the progress of learning (process-oriented), and identifies areas for improvement (diagnostic). At the program and unit level, relevant faculty and staff maintain assessment plans (including updating Student Learning Objectives (SLOs), mapping SLOs to institutional learning outcomes, and curriculum mapping), collect and analyze data, and execute action plans for continuous improvement as informed by the data. Lewis University assesses student learning and is deliberate in understanding the student experience. The organizational structure of assessment consists of several layers of relevant committees meant to focus efforts, democratize assessment work, and enhance communication.

Program Assessment

The University has developed an ongoing assessment plan to guide the evaluation and improvement of the radiography program that aligns with the Joint Review Committee on Education of Radiologic Technologists requirements. Effective August 1, 2024, Lewis University's substantive change request to transfer sponsorship from Oak Point University for JRCERT accreditation was approved.

Facilities (space, equipment, instructional materials)

1030(a)(4) and 1030.60(a)(5): The institution shall have adequate and suitable space, equipment and instructional materials to support institutional programs.

The proposed radiography program will be located at 111 W. 22nd Street, Suite 700 in Oak Brook, Illinois. Lewis University's Oak Brook campus provides convenient, accessible classes to working adult students in a professional setting. Located in a prime research and development corridor near many corporate headquarters, the 30,000 sq. ft. facility features 15 classrooms, nursing simulation labs and "outpatient" offices, a lounge, three conference rooms, two computer labs, and an additional computer area with multiple workstations. Lewis currently offers health sciences programming at the Oak Brook campus that contains specialized health sciences facilities and labs. Lewis rented additional space in the building for radiography labs (currently identified within the building on the 8th floor) though didactic courses will be held on the existing 7th floor. For students with learning disabilities, the Oak Brook campus staff works closely with Disability Services in CASE to provide accommodations on site, including but not limited to extended/alternative testing times and solitary, quiet testing conditions. The space is ADA compliant and complies with all local, state, and federal ordinances and laws for use as an educational facility. The radiography program will have access to scholarly sources through Lewis University's pre-existing digital library databases and resources. Research librarians and the Writing Center are available for classroom visits and 1:1 consultation with students, virtually and in person by appointment at the Oak Brook location. The radiography program faculty provide tutoring and support services to students. If any students are adult students in the program, there will be access to services after hours. For this purpose, Lewis contracts with Brainfuse to provide online, on-demand cross-disciplinary tutoring and academic support services to students.

Faculty and Staff

1030.30(a)(5) and 1030.60(a)(6): The education, experience and other qualifications of directors, administrators, supervisors and instructors shall ensure that the students will receive education consistent with the objectives of the program.

Lewis University has identified institutional policies that ensure faculty and staff possess the training, credentials, and other related qualifications to provide instruction at the institution. Faculty teaching in the proposed program will have the appropriate qualifications. The workforce planning on the staff and faculty side attempts to increase employee diversity to more closely mirror student demographics. Lewis is committed to recruiting and retaining faculty, staff, and administrators of color as part of its Catholic identity and Lasallian heritage, where diversity and inclusion are core values. Program quality is ensured through regular evaluation and observation of full-time, half-time, and adjunct faculty. The University Faculty By-Laws describe the purpose of evaluating faculty and the procedures and methods common to all colleges. More specific and rigorous processes may further exist in the individual college by-laws. Eligible faculty are also evaluated annually going through the tenure and promotion process where intensive evaluation occurs. The University Faculty By-Laws provide a timeline of the multi-step evaluation and input from various groups. In the spring of 2022, the Faculty Senate passed a motion to implement a post-tenure review process, which went into effect in 2022-23 as Academic Administrative Process 2.18 Post-Tenure Review. Lewis University will be prepared for accreditation activities due to hiring all Oak Point University Radiography faculty. Faculty have participated in the decision making of the radiography equipment necessary to perform simulations and labs and experiments to optimize classroom teaching.

Fiscal / Personnel Resources

1030.30(a)(11): The institution should be financially stable and capable of assuring the revenues needed for meeting stated objectives and fulfilling commitments to students; and

1030.60(a)(8): Fiscal and personnel resources shall be sufficient to permit the institution to meet obligations to continuing programs while assuming additional resource responsibilities for the new certificate or degree program.

Lewis University has submitted fiscal plans indicating revenue will exceed operating expenditures over the next five years. The institution will maintain instructional costs while increasing revenue.

Accreditation and Licensure

As part of the Oak Point University Teach-out, Lewis subsumed specialized accreditation from the Joint Review Committee on Education of Radiologic Technologists (JRCERT) through a transfer of sponsorship approved August 2024. Prior to the institutional closure in April 2024, Oak Point University had received an eight-year maximum accreditation from JRCERT on its last accreditation visit. Lewis will be prepared for accreditation activities since the University has retained all Oak Point University radiography faculty. The curriculum has been established for several years while operating under Oak Point University. The curriculum meets the educational requirements for licensure and certification. The American Registry of Radiologic Technologists is the certifying body that issues the certification exams for graduates to become registered radiologic technologists. ARRT certifies and registers technologists in a range of disciplines by overseeing and administering education ethics and examination requirements. To practice in Illinois, graduates from qualifying programs need both a license from the Illinois Emergency Management Association and certification by the ARRT. To be granted the IEMA certification, candidates must pass the ARRT certification exam. The proposed program meets all guidelines by both the ARRT and IEMA.

Program Information

1030.30(e): Publications and Information. Institutions shall be scrupulously ethical in all communication with the public and with prospective students. School publications, advertisements and statements shall be wholly accurate and in no way misleading; and

1030.60(a)(7): The information the institution provides for students and the public shall accurately describe the programs offered, program objectives, length of program, schedule of tuition, fees, and all other charges and expenses necessary for completion of the course of study, cancellation and refund policies, and such other material facts concerning the institution and the program or course of instruction as are likely to affect the decision of the student to enroll. This information, including any enrollment agreements or similar agreements, shall be available to prospective students prior to enrollment.

Detailed information on academic policies, tuition, fees, refund policies, admissions procedures, and other relevant information necessary for prospective students to make informed decisions on enrollment were provided in the application and will be published on the University's website.

Staff Conclusion

The staff concludes that Lewis University and its proposed Associate of Applied Science in Radiography meet the criteria in Sections 1030.30 and 1030.60 of the rules to implement The Private College Act (110 ILCS 1005) and The Academic Degree Act (110 ILCS 1010) and the relating Illinois Administrative Code (Title 23 Section 1030) pertaining to the assessment and licensure of a postsecondary institution.

Roosevelt University
222 East Church Street

Woodstock IL 60098
President: Dr. Ali R. Malekzadeh

Seeking Operating Authority: Fox Valley Region

Institutional Accreditation: Roosevelt University is accredited by the Higher Learning Commission (HLC).

Background and History

Founded in 1945, Roosevelt University (Roosevelt or the University) is a private, nonsectarian, not-for-profit institution of higher education located in Chicago, which was founded with a commitment to social justice and an emphasis on fairness, equality, and integrity. The main campus for Roosevelt is in downtown Chicago with an additional campus in Schaumburg. On March 9, 2020, Roosevelt acquired Robert Morris University, another private institution in the Chicago Region. Roosevelt is recognized as a grandfathered institution in its home regions of Chicago and North Suburban by the Illinois Board of Higher Education (IBHE) and consequently is exempt from many aspects of the IBHE oversight. On September 25, 2012, Roosevelt University sought and obtained IBHE authority to operate and grant the Bachelor of Science in Hospitality and Tourism Management in the West Suburban Region. On April 30, 2020, Roosevelt University sought and obtained authorization to operate in the Central Region to teach students in Robert Morris University's Central Region location following the acquisition. On June 8, 2021, the University sought and obtained authorization to operate in the South Metropolitan Region through a partnership with Joliet Junior College and the South Cook Intermediate Service Center. The University offered limited, less than 40 percent, programmatic face-to-face instruction for existing online degree programs emanating from its main campus.

With this application, Roosevelt University is seeking authorization to operate in the Fox Valley Region. The University entered into an agreement with McHenry County College (MCC) to provide MCC students, alumni, and other residents for Community College District 528 to take bachelor's as well as graduate courses and programs in the community in which they live as part of the MCC University Center. Roosevelt plans to offer bachelor's degree completion programs for human resource management, finance, marketing, criminal justice, graphic design, and a Master of Business Administration. Upon IBHE authorization for operation in the Fox Valley Region, Roosevelt will seek degree-granting authority for the proposed programs.

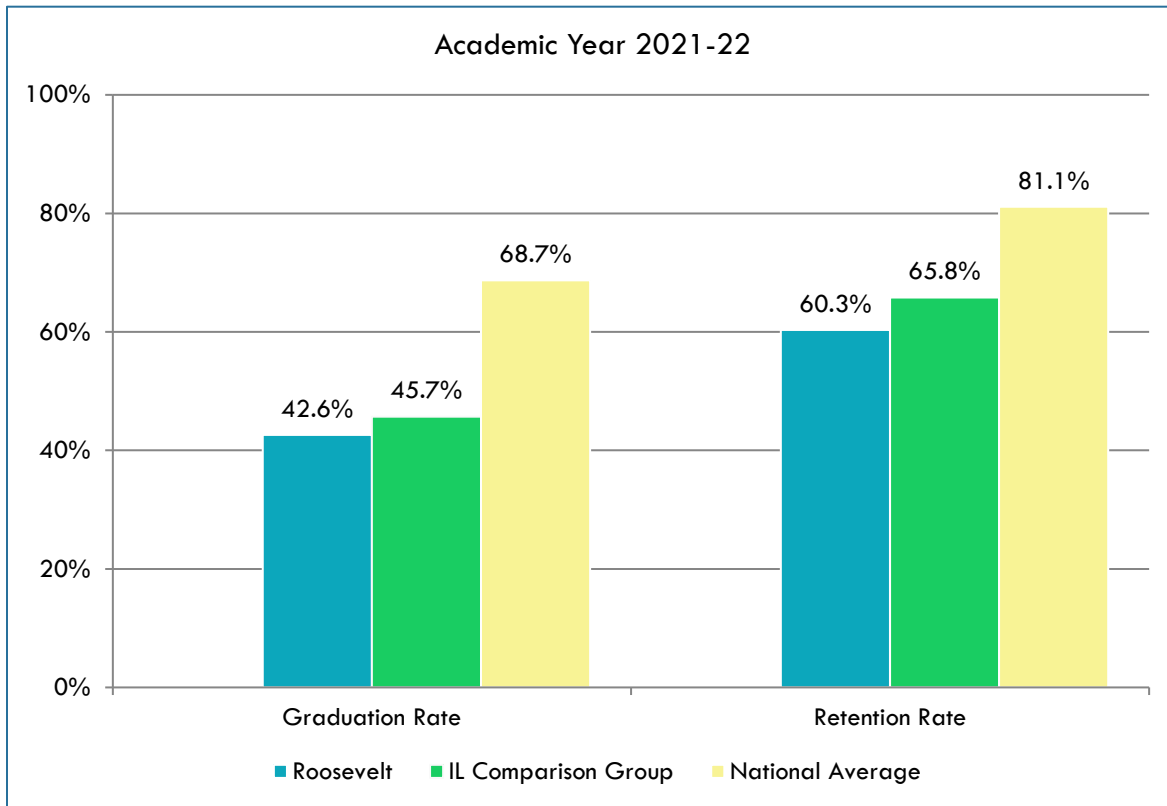
Institutional Data

1030.30(a)(3)(F): Success in student progression and graduation across all existing approved programs, and success rates in programs preparing students for certification and licensure, shall be consistent with expectations in higher education and the appropriate related field of study. At a minimum, the Board shall consider the following factors, based on results for similar institutions: (i) Graduation rates, certificate and degree completion rates, retention rates, and pass rates for licensure and certification aligned with thresholds set by State or national regulatory bodies; and (ii) Success rate, which shall be, at a minimum, higher than that of the lowest quartile of these measures for similar Illinois institutions defined as open versus competitive enrollment institutions and primarily associate versus primarily baccalaureate granting institutions. Exceptions may be made to the lowest quartile if an institution is above the national average for these measures using the same comparison categories of institutions.

1030.30(a)(3)(G): Additional student success measures shall be considered in the review of applications for authorization. The Board shall establish minimum rates of success based on results for similar institutions or thresholds set by State or federal regulatory bodies. i) At a minimum these data shall include student loan default rates, student indebtedness rates, job placement rates, student learning measures and other success indicators. ii) Institutions that participate in Federal Student Loan programs shall have 3-year Official Cohort Default rates no higher than 25 percent. Institutions with Federal Financial Responsibility Composite Scores shall have a score that is no lower than 1.0. Institutions that fail to meet these thresholds may be restricted from implementing new certificate or degree programs. iii) The success rate shall be, at a minimum, higher than that of the lowest quartile of these measures for similar Illinois institutions defined as open versus competitive enrollment institutions and primarily associate versus primarily baccalaureate granting institutions. Exceptions may be made to the lowest quartile if an institution is above the national average for these measures using the same comparison categories of institutions.

This section includes information about institutional and student success measures for each institution seeking program approval. The institution's rates will be compared to Illinois institutions from within a select comparison group and against the national standards or averages. For a proposed undergraduate program, this section will include undergraduate graduation rates, first to second year retention rates, student loan default rates, and any applicable licensure passage rates. For a proposed graduate program, this section will primarily focus on student loan default data since this measure also includes graduate students in the calculation.

Undergraduate Graduation and Retention Rates



Source: National System for Education Statistics (NCES), US Department of Education
 Note: Roosevelt University is in the four-year, inclusive Illinois comparison group.
 Higher percentages are positive indicators.

Undergraduate Graduation Rate

The graduation rate measures the rate at which entering freshmen graduate within 150 percent of normal program length. Data are provided for six-year graduation rates for first-time, full-time bachelor's degree-seeking students and three-year graduation rates for full-time associate degree-seeking students. The national standard for graduation rates is reported annually by the National Center for Education Statistics (NCES).

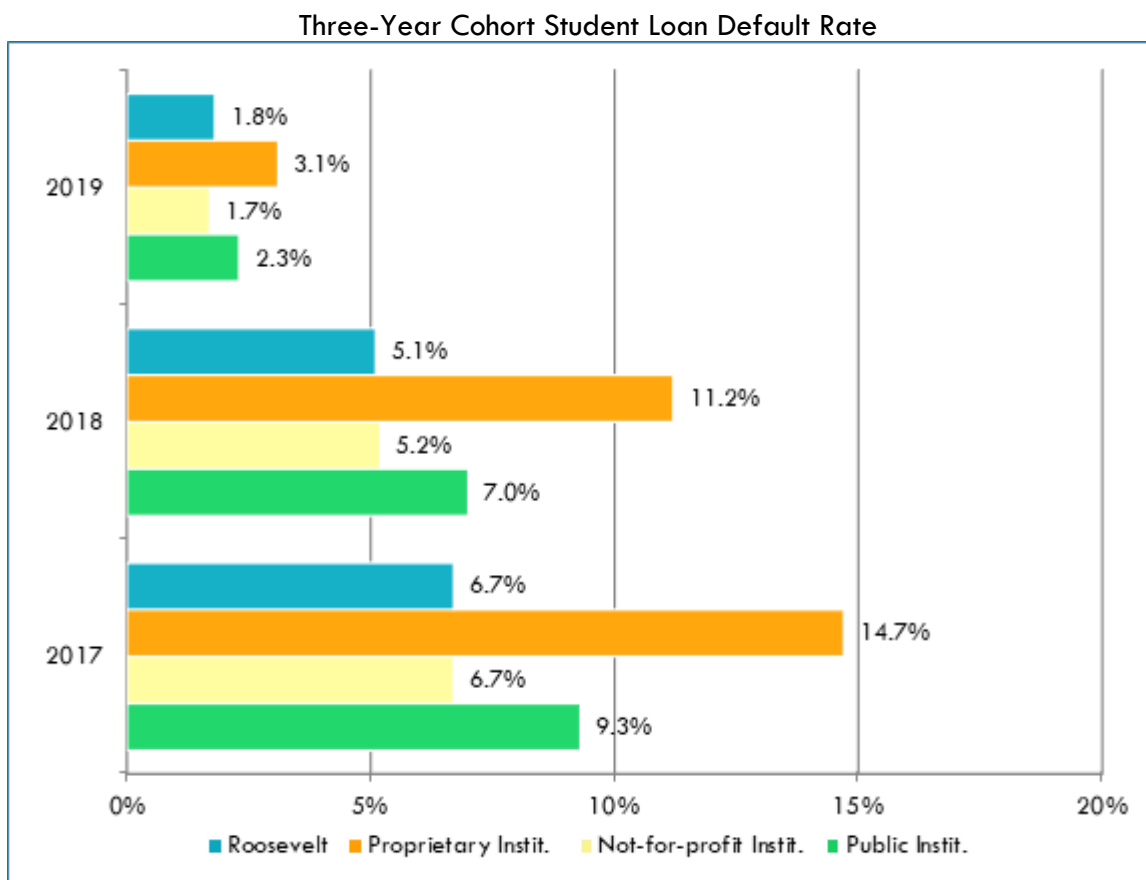
Undergraduate Retention Rate

Retention rates examine the percentage of first-time degree seeking students enrolled in the fall of the prior year that are still enrolled in the fall of the current year. The national standard for retention rates is reported annually by NCES.

Undergraduate Completions per 100 Full-Time Equivalent

Academic Year	Roosevelt University	Comparable Illinois Institutions
2021-22	31	32.2

The full-time equivalent (FTE) data is a unit of measurement intended to represent one student enrolled full-time for one academic year. The calculation is based upon credit/contact hours offered at an institution divided by a standard minimum (12 credit hours) full-time course load. The completions per 100 FTE data are included to provide a holistic view of completion across different student populations.



Source: National Center for Education Statistics (NCES), US Department of Education

Note: Due to the pause on federal student loan payment that began in March 2020, the cohort default rate for fiscal years 2020 and 2021 is zero percent for the institution and all institution types. The national cohort default rate for fiscal year 2019 was 2.3 percent and zero percent for fiscal years 2020 and 2021.

A lower number is a positive indicator.

The three-year cohort student loan default rate is the percentage of a school's borrowers who enter repayment on certain Federal Family Education Loan Program or William D. Ford Federal Direct Loan Program loans during a particular federal fiscal year, October 1 to September 30, and default or meet other specified conditions prior to the end of the second following fiscal year.

A Thriving Illinois: Higher Education Paths to Equity, Sustainability, and Growth

Roosevelt University supports Goal 1, Equity, of *A Thriving Illinois*, to close the equity gaps for students who have historically been left behind. Roosevelt is seeking operating authority for a partnership with McHenry County College to participate in its University Center to specifically address non-traditional students who may not be able to leave the geographic area to complete

a bachelor's degree. The partnership will create a seamless pathway for students, in particular those who may be regionally bound, to complete a bachelor's degree after attending MCC.

In addition, the University has participated in the Illinois Equity Attainment Initiative since 2018. This is the hallmark program of the Partnership for College Completion (PCC), a non-profit organization founded to improve graduation rates for all students to help them achieve career aspirations. The overarching goal of PCC is to eliminate achievement gaps in college degree completions for low-income, first-generation, Latinx or Hispanic, and Black or African American students in Illinois by 2025. Roosevelt is a diverse institution with U.S. Department of Education designations as a Hispanic Serving Institution and a Minority Serving Institution. The University has a total Hispanic or Latino population of 28.4 percent and a non-White/non-resident Alien population of 59.9 percent.

Roosevelt structured data collection and analysis points to analyze persistence and completion rates. Current initiatives include focused efforts for wrap-around student support services such as providing a food and toiletry pantry, Multicultural Student Support Service office, students of concern team, and early alert programs. The goal is to provide major services to be a catalyst for an increase in retention and graduation rates to eliminate disparities in degree completion rates between African American and White students, Latinx and White students, and Pell-grant eligible students.

Roosevelt is implanting strategies to increase equity in attainment for several student populations, including launching the Education Technology, Services, and Research platform to track and support students. The platform provides early at-risk alert flags to allow staff to proactively reach out and connect with students. Roosevelt is intentionally increasing full-time professional academic advisors to support this effort as well as hiring a diversity, equity, and inclusion specialist. The specialist will identify gaps in systems and processes that create barriers to equitable student success, enhance classroom learning, and seek additional grant funding, including Gateways to Completions national program. The University has secured several external grants to support equity work, including a \$2.7 million Title III HSI STEM grant to increase STEM engagement, retention, and graduation rates, a \$1.1 million Early Childhood Access Consortium for Equality grant from the State of Illinois, to support early childhood education students, and \$1.34 million McNair Scholars Program to provide enhanced academic support to low-income, first-generation, and underrepresented college students with strong scholarly potential.

The proposed program will contribute to Goal 2, Sustainability, of *A Thriving Illinois*, to build a stronger financial future for individuals and institutions by finding ways to reduce the financial burden of education on students and their families. Since 2021, Roosevelt has implemented significant initiatives to make education more affordable through a tuition reset program. For the 2023-2024 academic year, the University lowered its tuition rate for full-time undergraduate students from \$33,068 to \$20,000 per academic year. This effort was in response to student concerns regarding affordability and access to Roosevelt. The University is offering an even lower tuition rate to MCC students who enroll in Roosevelt's undergraduate programs at the MCC University Center. Students enrolling with 24 credit hours per academic year will pay approximately \$13,464, while those enrolled at 30 credit hours will pay approximately \$16,830 per academic year. In addition, MCC has agreed to provide \$1,000 in scholarships for new students continuing their education through Roosevelt University at MCC University Center.

The proposed program will also contribute to Goal 3, Growth, of *A Thriving Illinois*, to *increase talent and innovation to drive economic growth*. The relationship between Roosevelt University and McHenry County College is a collaboration to meet the labor market demands in McHenry County. Roosevelt will leverage MCC's connections and established workforce networks to engage with business and industry in the Fox Valley Region. Lightcast, formerly Emsi Burning Glass, a comprehensive platform for labor market data, shows that in the past 12 months, the top employers are in health care, wellness, business, and education. Roosevelt will launch undergraduate programs in human resources management, finance, marketing, criminal justice and graphic design. The University will also offer a Master of Business Administration. According to the Illinois Department of Employment Security, the overall employment change from 2022 through 2032 is 2.66 percent. The proposed programs for Roosevelt University at MCC University Center average 4.39 percent growth in selected, related occupations.

Illinois Employment Projections, 2022-2032 For Selected Occupational Codes						
Occupation Title	Employment			Average Annual Job Openings Due to...		
	2022	2032	Change (%)	Growth	Replacements (transfers & exits)	Total
Marketing Managers (SOC 11-2021)	25,579	26,389	3.17	81	2,025	2,106
Financial Managers (SOC 11-3031)	46,456	52,874	13.79	641	3,305	3,946
Human Resources Managers (SOC 11-3121)	13,108	13,537	3.27	43	984	1,027
Business & Financial Operations Occupations	414,333	431,952	4.25	1,762	33,161	34,923
Business Operations Specialists (SOC 13-1000)	285,567	298,343	4.47	1,278	23,840	25,118
Human Resources Specialists (SOC 13-1071)	34,216	36,011	5.25	180	2,870	3,050
Graphic Designers (SOC 27-1024)	12,130	12,479	2.88	35	980	1,015
Law Enforcement Workers (SOC 33-3000)	46,866	47,201	0.71	34	3,728	3,762
All Occupations	6,369,370	6,538,492	2.66	16,912	691,808	708,720

Source: Illinois Department of Employment Security

Curriculum / Assessment

1030.30(a)(3): The caliber and content of each course or program of instruction, training or study shall be reasonable and adequate for achieving the stated objectives for which the course or program is offered. An undergraduate curriculum shall include general education in alignment with the degree level and objectives.

1030.60(a)(4): The caliber and content of the curriculum shall assure that the stated certificate or degree objectives for which the program is offered will be achieved.

Admission

Applicants for freshman admission must submit high school or GED transcripts, official transcripts from any college or university attended, and official results from either the ACT or SAT standardized tests. Roosevelt University classifies freshman applicants as those who graduated from high school or completed a GED and who have attempted less than 15 credit hours of transferable college credits, excluding dual-enrollment, Advanced Placement, and/or International Baccalaureate credits before graduation. Graduate applications are managed by the Office of Admissions and requirements vary by program. The Master of Business Administration program requires at least a 3.0 GPA and official transcripts. Also, if an applicant's GPA is under 2.75, a letter of intent outlining personal and professional goals is required along with a resume.

Curriculum

Upon approval of the proposed operating authority, in the Fox Valley Region, Roosevelt University will seek degree-granting authority for current Roosevelt programs that will be offered at the McHenry County College University Center location, including bachelor's degree programs in criminal justice, human resource management, marketing, finance, graphic design and a graduate program, Master of Business Administration (MBA). The undergraduate programs will be structured as degree completion programs where Roosevelt will teach less than 50 percent of the credits via face-to-face instruction with some supplemental online courses until degree-granting authority is secured.

Assessment of Student Learning

Roosevelt University requires all programs to have learning goals, teaching objectives, and student learning outcomes, and to engage in a process of analyzing student work produced in program curriculum to assess and improve student learning in the program. Program faculty develop yearly plans to measure one or more student learning outcomes. Programs map student learning goals, teaching objectives, and student learning outcomes to specific courses in relevant courses using program assessment rubrics designed to measure achievement of the specific outcomes. The rubrics are used to determine whether and how students are learning according to each program's goals.

All programs are required to have learning outcomes that are articulated in individual course syllabi. These direct assessments provide meaningful feedback to students to help them understand their progress through the program.

Program Assessment

The University leadership prioritizes assessment by implementing a cycle of review. The assessment activity is overseen by the Provost's Office to ensure broad representation that every program and unit at the institution conduct annual assessments. The University's annual plan

implements a cycle of holistic program review that combines assessment of student learning with assessment of program resources, enrollment trends, and staffing. The University has an institutional approach to annual assessment which is directly connected to the planning and budgeting calendar while maintaining the quality of academic programs. The comprehensive review plan is aligned with the institutional strategic plan which ensures progress is made on continuous improvement. Individual departments are required to provide annual assessment plans in the institution's TK20 assessment platform. Designated assessment coordinators, who are program faculty, use the TK20 system to input outcomes and share summary overviews. The faculty will submit an annual summary of major changes implemented based on the assessment of student learning to ensure that progress is made.

Facilities (space, equipment, instructional materials)

1030(a)(4) and 1030.60(a)(5): The institution shall have adequate and suitable space, equipment and instructional materials to support institutional programs.

Roosevelt University will use the Catalyst Campus facilities of McHenry County College, as outlined in the University Center agreement, which is in full compliance with all regulations, laws, and local and state ordinances. The Catalyst Campus is approximately ten minutes away from the main MCC campus. All technology and equipment needed for instruction for the agreed upon programs are sufficient at MCC, including free internet, printing, and copying services. There are nine classrooms, with a total of 7,049 square feet with 228 seating capacity. In addition, there are two laboratories at 632 square feet with four seating capacity. Roosevelt faculty and staff have designated office space to accommodate student meetings for activities such as advisement, registration, and course assistance. There are two computer labs, one for Microsoft Windows based computers and one with Apple Mac mini computers, each with new computers, 31-inch student monitors, and instructor stations. MCC installed Microsoft Office and Adobe Creative Suites for student usage. MCC also installed additional audio-visual equipment to specifically support the graphic design program including a professional camera with audio input, corresponding tripods, microphones, and studio lights. Roosevelt faculty, staff, and students will have access to the MCC help desk to assist students with MCC user account issues via in-person visits, phone calls, or on the website.

Students will have access to Library resources at MCC which has 224,008 electronic resources and 37,009 physical volumes available with librarians who hold library science credentials. In addition, students and faculty will have access to Roosevelt's Murray-Green Library on the main campus in Chicago. The library is accessible to all students remotely, while librarians are available to answer questions via email, chat, text, or phone. The collection includes more than 185 online databases with full-text and indexed articles from professional journals, newspapers, and magazines. The library is a member of the Consortium of Academic and Research Libraries in Illinois (CARLI) which allows participants to utilize "I-Share." The sharing program allows participants to access more than 90 academic libraries with access to more than 38 million items.

Faculty and Staff

1030.30(a)(5) and 1030.60(a)(6): The education, experience and other qualifications of directors, administrators, supervisors and instructors shall ensure that the students will receive education consistent with the objectives of the program.

Roosevelt University has established policies to ensure that faculty members possess the training, credentials, and other required qualifications to provide instruction to students. The University follows the Higher Learning Commission's guidelines for hiring all faculty, including completing a program of study in the discipline or subfield in which they teach, with coursework at least one level above that of the courses being taught. The University utilizes hiring committees for all full-time faculty and administrative positions. Committees are comprised of diverse faculty and administrators who participate in the application review and interview process. The diverse nature of the committee reduces the likelihood of implicit bias in the interview and application process. The University also included recruitment and retention of faculty and staff of color as part of its 2025 strategic plan.

The institution evaluates faculty annually through the IDEA evaluation system, which includes the ability to compare course evaluations from similar courses at other participating institutions. This system, launched by a nonprofit entity, focuses on creating innovations in teaching and learning. The system captures narrative accounts from students regarding instructors' capabilities and the relationship between course goals and outcomes. This additional level and depth of feedback provides context for faculty members in a holistic manner. This structure affords faculty members the same consideration for a well-rounded assessment, similar to those used for a holistic review of student application materials. This effort supports *A Thriving Illinois* through its equity lens. The additional context in the process helps ensure equitable assessments of faculty, which should lead to higher retention of the diverse faculty.

Fiscal / Personnel Resources

1030.30(a)(11): The institution should be financially stable and capable of assuring the revenues needed for meeting stated objectives and fulfilling commitments to students; and

1030.60(a)(8): Fiscal and personnel resources shall be sufficient to permit the institution to meet obligations to continuing programs while assuming additional resource responsibilities for the new certificate or degree program.

The University has submitted fiscal plans indicating that projected tuition revenue will exceed operating expenditures over the next five years.

Accreditation / Licensure

Specialized accreditation is held by Roosevelt for the Master of Business Administration program through the Accreditation Council for Business Schools and Programs, formerly the Association of Collegiate Business Schools and Programs, which would not require additional approval.

Program Information

1030.30(e): Publications and Information. Institutions shall be scrupulously ethical in all communication with the public and with prospective students. School publications, advertisements and statements shall be wholly accurate and in no way misleading; and

1030.60(a)(7): The information the institution provides for students and the public shall accurately describe the programs offered, program objectives, length of program, schedule of tuition, fees, and

all other charges and expenses necessary for completion of the course of study, cancellation and refund policies, and such other material facts concerning the institution and the program or course of instruction as are likely to affect the decision of the student to enroll. This information, including any enrollment agreements or similar agreements, shall be available to prospective students prior to enrollment.

Detailed information on academic policies, tuition, fees, refund policies, admissions procedures, and other relevant information necessary for prospective students to make informed decisions on enrollment were provided in the application and are published on the University website.

Staff Conclusion

The staff concludes that Roosevelt University meets the criteria in Sections 1030.30 and 1030.60 of the rules to implement The Private College Act (110 ILCS 1005) and The Academic Degree Act (110 ILCS 1010) and the relating Illinois Administrative Code (Title 23 Section 1030) pertaining to the assessment and licensure of a postsecondary institution.