September 30, 2009

MEMORANDUM

To: Mr. Ken Wingate, Chairman, and Members, Commission on Higher Education

From: Dr. Bettie Rose Horne, Chairman, and Members, Committee on Academic Affairs and Licensing

Consideration of Request for Initial License for Branch
A.O.S., Dental Assistant, Medical Assistant, and Medical Office Administration
Education Affiliates, branch of Fortis College, at Columbia

Summary

Education Affiliates, Inc., (EA) (www.edaff.com) requests approval to establish Fortis College (FC) (www.fortiscollege.com) Columbia to offer programs leading to the Associate of Occupational Science degree in (1) Dental Assistant, (2) Medical Assistant, and (3) Medical Office Administration. After approval by the Commission, EA officials expect to renovate to their specifications a location in Columbia and implement the programs at the new site in January 2010. Programs will be offered on site.

Education Affiliates, Inc., a private, for-profit Delaware-based corporation with central offices in Baltimore, MD, owns 39 private career schools in 13 states, owns EFC Trade, Inc., and Subsidiaries, and several other subordinate corporate groups. JLL Partners Fund IV, LP, an investment group with offices based in New York City, owns Education Affiliates, Inc. All management decisions involving the growth and development of the schools are controlled by Education Affiliates (EA) under Duncan M. Anderson, the president/CEO of Education Affiliates, Inc. No individuals own five percent or more of any of the corporate entities or any of the EA-controlled schools.

The Accrediting Bureau of Heath Education Schools (ABHES) will initially grant interim inclusion for Fortis College, Columbia, within the main campus accreditation. The U.S. Department of Education recognizes the interim accreditation and allows the school eligibility for Title IV financial aid. Approximately six months after the matriculation of the first students, an ABHES staff member will visit the school and assist the school officials in preparing a self-evaluation report. A team of ABHES evaluators will review this report, visit the main and branch campuses, and report findings to ABHES. EA officials expect that ABHES will vote on inclusion of the branch at its meeting in December 2011.

The following information from the U.S. Department of Education shows combined student loan default rates for schools owned by Education Affiliates.

School	Type	Control	PRGMS		FY 2006	FY 2005	FY 2004
Schools owned by Education Affiliates Combined	Certificates, diplomas, and Associate's	Proprietary	Federal Family Education Loan (FFEL) and Federal Direct Loan (FDL)	Default Rate	12.11	9.47	9.16
				No. in Default	784	556	491
				No. in Repay	6,473	5,873	5,358

The U. S. Department of Education sanctions a school when the school's three most recent cohort default rates are 25 percent or higher or if a school's current default rate is greater than 40 percent. Except in the event of a successful adjustment or appeal, such a school will lose FFEL, Direct Loan, and Federal Pell Grant program eligibility for the remainder of the fiscal year in which the school is notified of its sanction and for the following two fiscal years. Fortis College's default rates are far below this standard.

According to Fortis officials, the average student loan debt for its graduates is $14,500.

Education Affiliates (EA) officials have signed a lease for facilities of approximately 28,000 square feet at 246 Stoneridge Drive, Suite 101, Columbia (off Graystone at I-126),. Renovations have begun and are expected to be completed on October 1, 2009. Upon completion of the renovations, EA will submit to Commission staff relevant evidence of compliance with local, county, and state codes. Commission staff will inspect the facility before issuing a license.

The facilities will include medical labs equipped with microscopes, stethoscopes, blood pressure cuffs, EKG machines, surgical instruments, examination tables, and injection arms/skins. The dental program will have operator-functional clinics including a sterilization center, dental materials clinic with lab, front office training area, panoramic x-ray machine, intra-oral x-ray heads, and a darkroom. The lecture rooms will have internet connectivity, media carts, and digital projectors to enhance the lectures with access to specialized medical web sites and use of web-based materials. There will be a student lounge with vending machines and microwaves. Administrative offices will include student services, career services, financial aid, registrar, admissions, and bookkeeping. There will be a faculty workroom and faculty offices for student conferences.

Fortis College in Columbia will have a Learning Resource Center (LRC) especially designed to support its health-oriented programs. The LRC will include a current collection of reference books, print journals, and media titles covering basic sciences, general education, nursing, dental, and allied health subjects which support the medical curricula. There will be a separate faculty collection in the LRC that will include books and journals on education. An online library catalog will be accessible to students and faculty. The Learning Resource Center will have a website to allow faculty and student access to a wide array of web-based resources including access to research sites, organization links, career development information, 30 instructional media titles, and web-based tutorials for NCLEX remediation, math, and pharmacology. The site will provide access to the Library Information & Resources (LIRN) collection of data bases. The "Ask the Librarian" link will provide online reference services to faculty and students off-site. The LRC website will have a staff page which permits faculty access to curriculum-related instructor guides, a staff calendar, continuing education links, and threaded discussions.

The Learning Resource Center will have desktop computers which give students access to self-paced licensure reviews, medical terminology software, and the MS-Office Suite (Word, PowerPoint, Excel, and Publisher). The Center will provide student seating at study tables and tech tables. The LRC will be staffed by a credentialed Master of Library Science librarian, with monitoring assistance from a library technician and/or work study students, and will be open and staffed all hours that classes are in session.

The LRC space will have wireless Internet, dual synchronous printers and a copy machine. All classrooms and labs will have wireless classroom technology with ceiling projectors, speakers, classroom computers, and DVD/Video players permitting faculty to make PowerPoint presentations, access the Internet, and project instructional media titles.

The College will employ a school director; he or she will report to the regional vice president; the regional vice president reports to the corporate CEO. Reporting to the school director will be a business officer and directors of admissions, education, financial

aid, and career services. The director of education will supervise the registrar, director of student services, librarian, and academic program chairs.

Members of faculty who teach general education courses must possess a master's degree with 18 hours in the teaching discipline or hold a master's degree with a major in the teaching discipline. Faculty teaching professional, occupational, or technical courses at the associate-degree level must possess at minimum an associate degree in the discipline and at least three years of relevant professional experience. Exceptions to academic preparation may be made with the consent of the Commission.

Students applying for admission to any of the three proposed programs must be at least 17 years of age and provide documentation of graduation from an accredited high school or from a state-approved secondary education curriculum or provide official documentation of high school graduation equivalency. Applicants must score 15 or higher on the Wonderlic Scholastic Level Entrance (SLE) test for skills assessment. Students must score a nine or above on the Test of Adult Basic Education (TABE) or they must enroll in remedial courses in math, reading, and writing.

Transfer credits may be accepted if earned within the prior 60 months from an accredited college or university for courses in which the student earned a grade of "C" or better. Applicants may also apply credits from the College Level Examination Program (CLEP) and education programs sponsored by the military. The proposal as originally submitted to the Commission prescribed an earned grade of "B". Following discussion at the meeting of the Committee on Academic Affairs and Licensing about their transfer policies, officials at Fortis decided to lower the required grade for transfer from "B" to "C", but to retain the delimiting date to 60 months.

FC intends to begin offering its programs leading to the proposed associate degrees in January 2010, enrolling in the first year approximately 15 to 20 students in each degree program plus 50-60 students in four non-degree certificate programs.

Tuition and fees for the degree programs are shown in the following table:

A.O.S.	Tuition	Enrollment Fee	Books	Instructional Materials	Uniforms	TOTAL
Dental Assistant 99 Quarter Credits 1884 Clock Hours	$24,375	$150	$1,183	$600	$50	$26, 358
Medical Assistant 97 Quarter Credits 1744 Clock Hours	$22,750	$150	$1,218	$600	$50	$24,768
Medical Office Administration 97 Quarter Credits 1744 Clock Hours	$22,750	$150	$1,153	$600	$50	$24, 703

Programs of Study

A.O.S., Dental Assistant

The objective of the 99-quarter-credit hour, 90-week Dental Assistant program is to train students to acquire satisfactory skills and demonstrate competence in a variety of dental office procedures and laboratory techniques. Upon satisfactory completion of the program, graduates will be qualified to assume entry-level positions as dental assistants in dental offices and clinics.

A.O.S. in Dental Assistant Curriculum		
Courses	**Quarter Credit Hours**	**Clock Hours**
AHP103 Introduction to Dental Assisting	4	60
AHP104 Basic Life Support	4	60
AHP115 Office Communications	4	60
AHP130 Spanish for Allied Health Professionals	4	60
COM101 Communication	4	60
DAS102 General Anatomy & Physiology for Allied Dental Professionals	4	60
DAS105 Dental Assisting Procedures and Restorative	4	60
DAS106 Dental Specialties and Expanded Functions	4	60
DAS112 Dental Materials/Prosthesis Fabrication	4	60
DAS114 Radiology	4	60
DAS116 Computer Applications and Billing	4	60
DAS121 Dental Office Procedures	4	60
DAS213 Intermediate Dental Assisting Procedures and Restorative Applications	4	60
DAS214 Intermediate Dental Specialties & Expanded Functions	4	60
DAS215 Infection Control In Dentistry	4	60
DAS230 Dental Assisting Seminar	4	60
DAS231 Dental Clinical I	4	180
DAS232 Dental Clinical II	4	120
DAS241 Dental Clinical III	2	60
ENG101 English Composition	4	60
ENV101 Environmental Science	4	60
MAT099 Basic Math	0	60
MAT101 College Math	4	60
PDC100 College Success	1	24
PDC200 Career Development	4	60
PSY101 General Psychology	4	60
REA099 Reading Fundamentals	0	60
SOC101 Sociology	4	60
WRI099 Writing Strategies	0	60
Totals	**88**	**1884**

The Commission on Dental Accreditation of the American Dental Association (CODA) is the specialized program accrediting agency for dental assisting. The curriculum of the proposed dental assistant program is designed to comply with CODA

accreditation requirements. CODA requires that the College have graduate outcomes before it is eligible for CODA accreditation. Fortis College will apply for CODA accreditation as soon as it is able to meet eligibility requirements. The process to achieve CODA accreditation may take up to two years after the opening of the program. Practitioner licensure or certification is not required for employment as a dental assistant. However, to operate legally dental x-ray equipment and perform dental radiologic procedures in the state of South Carolina, a dental assistant must complete a South Carolina Board-approved structured course in radiation safety. To perform expanded functions under the direct supervision of a licensed dentist in the state of South Carolina, a dental assistant must earn status as an Expanded Duty Dental Assistant (EDDA). To qualify, one must: (1) Graduate from a CODA-accredited dental assisting program OR (2) Complete two years of continuous full-time employment as a chairside dental assistant. In order to monitor nitrous oxide conscious sedation, EDDAs must complete a course approved by the South Carolina State Board of Dentistry and receive certification by the Board. Officials at Fortis are beginning the approval process with the South Carolina Dental Board for Fortis graduates to have approval to operate dental x-ray equipment, perform dental radiologic procedures, and to monitor nitrous oxide conscious sedation.

According to the U.S. Department of Labor, Bureau of Labor Statistics, *Occupational Outlook Handbook*, employment of dental assistants is expected to increase much faster than average; job prospects are expected to be excellent.

Aiken, Florence-Darlington, Greenville, Horry-Georgetown, Midlands, Trident, and York Technical Colleges offer programs leading to an associate degree in dental hygiene.

A.O.S., Medical Assistant

The objective of the 97-quarter-credit hour, 84-week Medical Assistant program is to train students to acquire satisfactory skills and demonstrate competency in a variety of medical office procedures and laboratory techniques in order to work under the direct supervision of a physician. Medical assistants perform routine administrative and clinical tasks to keep the offices and clinics of physicians, podiatrists, chiropractors, and optometrists running smoothly.

Upon satisfactory completion of the training, graduates will be qualified to assume entry-level positions as medical assistants, performing medical procedures, lab techniques, and front office duties. They will understand OSHA regulations, HIPAA requirements, confidentiality, the use of Universal Precautions, and the legal aspects of the allied health environment.

A.O.S. in Medical Assistant Curriculum		
Courses	Quarter Credit Hours	Clock Hours
AHP 104 Basic Life Support	4	60
AHP105 Medical Terminology	4	60
AHP106 Medical Anatomy and Physiology	4	60
AHP114 Hematology and Phlebotomy	4	60
AHP130 Spanish for Allied Health Professionals	4	60
AHP201 Cardiovascular System and EKG's	4	60
AHP203 Pathophysiology and Pharmacology	4	60
CMP101 Computer Applications	4	60
CMP102 Computer Applications	4	60
COM101 Communication	4	60
ENG101 English Composition	4	60
ENV101 Environmental Science	4	60
MAS113 Medical Specialties I	4	60
MAS114 Medical Specialties II	4	60
MAS115 Administrative Medical Procedures	4	60
MAS117 Medical Records & Insurance	4	60
MAS212 Invasive Medical Procedures	4	60
MAS214 MA Skills, Certification Review, & Patient Education	4	60
MAS241 Externship	4	160
MAT099 Basic Math	0	60
MAT101 College Math	4	60
MOA109 Electronic Health Records	4	60
PDC100 College Success	1	24
PDC200 Career Development	4	60
PSY101 General Psychology	4	60
REA099 Reading Fundamentals	0	60
SOC101 Sociology	4	60
WRI099 Writing Strategies	0	60
Totals	**97**	**1,744**

There is no specialized program accrediting agency for medical assistant. Practitioner licensure or certification is not required for employment.

According to the U.S. Department of Labor, Bureau of Labor Statistics, *Occupational Outlook Handbook (OOH),* job prospects should be excellent with employment projected to grow much faster than the average for all occupations. The OOH ranks medical assistants among the fastest growing occupations over the 2006-16 decade. Helping to drive this growth in employment is the increasing number of group

practices, clinics, and other health care facilities that need a high proportion of support personnel, particularly medical assistants who can handle both administrative and clinical duties.

ECPI College of Technology at Charleston, Columbia, and Greenville; Forrest Junior College at Anderson; Miller-Mott Technical College at Charleston; South University at Columbia; and Virginia College at Greenville offer programs leading to an associate degree in medical assisting.

A.O.S., Medical Office Administration

The objective of the 97-quarter-credit hour, 84-week Medical Office Administration program is to train students to acquire satisfactory skills and demonstrate competence in a variety of medical/dental office administration procedures necessary for entry-level employment in a medical or dental practice. Graduates will be qualified to assume entry-level positions as medical/dental office assistants, medical secretaries, medical billers/collectors, and insurance claims processors. Graduates will be eligible to sit for the National Certified Medical Office Assistant exam and the National Certified Insurance Coding and Billing Specialist exam. These exams are optional for employment. The curriculum is shown below.

A.O.S. in Medical Office Administration Curriculum		
Courses	Quarter Credit Hours	Clock Hours
AHP103 Introduction to Dental Assisting	4	60
AHP104 Basic Life Support	4	60
AHP105 Medical Terminology	4	60
AHP106 Medical Anatomy and Physiology	4	60
AHP115 Office Communications	4	60
AHP121 Medical Office Procedures	4	60
AHP122 Reimbursement Methodologies & Office Procedures	4	60
AHP130 Spanish for Allied Health Professionals	4	60
AHP132 Computerized medical billing	4	60
AHP203 Pathophysiology and Pharmacology	4	60
BKG101 Bookkeeping	4	60
CMP102 Computer Applications	4	60
COD101 Basic Diagnostic and Procedural Coding Systems	4	60
COD102 Intermediate Diagnostic and Procedural Coding Systems	4	60
COD103 Advanced Diagnostic and Procedural Coding Systems	4	60
COM101 Communication	4	60
ENG101 English Composition	4	60
ENV101 Environmental Science	4	60
MAT099 Basic Math	0	60
MAT101 College Math	4	60
MOA109 Electronic Health Records	4	60
MOA241 Externship	4	160
PDC100 College Success	1	24
PDC200 Career Development	4	60
PSY101 General Psychology	4	60
REA099 Reading Fundamentals	0	60
SOC101 Sociology	4	60
WRI099 Writing Strategies	0	60
Totals	**97**	**1744**

There is no specialized program accrediting agency for medical office administration. Practitioner licensure or certification is not required for employment.

According to the U.S. Department of Labor, Bureau of Labor Statistics, *Occupational Outlook Handbook,* this occupation is expected to be among those with the highest growth. Employment opportunities should be best for applicants with extensive knowledge of software applications and for experienced administrative assistants. Opportunities also should be very good for those with advanced communication and computer skills.

ECPI College of Technology at Charleston, Columbia, and Greenville; Forrest Junior College at Anderson; and Virginia College at Charleston and Greenville offer programs leading to an associate degree in medical office administration or management.

Recommendation

The Committee on Academic Affairs and Licensing commends favorably to the Commission initial licensure for five years to Education Affiliates/Fortis College to establish a branch campus in Columbia, South Carolina, to offer programs leading to the Associate of Occupational Science in (1) Dental Assistant, (2) Medical Assistant, and (3) Medical Office Administration. Advertising will begin immediately upon approval by the Commission and by the Accrediting Bureau of Health Education Schools (ABHES), and implementation of the programs will occur after facilities are renovated and as soon as enrollments justify. The Committee further recommends that the Commission grant authority to the staff to license the Columbia site when the facility has been developed.