

# RICKETTS GREAT BOOKS COLLEGE

APPLICATION FOR A RECURRENT AUTHORIZATION TO  
OPERATE A POSTSECONDARY INSTITUTION IN NEBRASKA

MAIN APPLICATION

FEBRUARY 9, 2024

STATE OF NEBRASKA  
COORDINATING COMMISSION FOR POSTSECONDARY EDUCATION

**APPLICATION FOR A RECURRENT AUTHORIZATION TO OPERATE A  
POSTSECONDARY INSTITUTION IN NEBRASKA**

**For Institutions Applying to Establish an Administrative Office**

**Date:** February 9, 2024

**Name of Institution:** Ricketts Great Books College

**Street Address:** 9140 W. Dodge Rd

**City/State/Zip Code:** Omaha Nebraska, 68114

**Name of Owner of Institution:** Great Books College LLC

**Owner's Mailing Address (if  
different from above):** \_\_\_\_\_

**Name of Contact person:** Raymond Ravaglia

**Title:** Chief Academic Officer / Chief Operating Officer

**Telephone Number:** 616 730 2030

**Fax Number:** \_\_\_\_\_

**E-mail Address:** rravaglia@rickettsgreatbookscollege.org

**Web Site for Institution:** www.rickettsgreatbookscollege.org

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**Proposed location in Nebraska:** 9140 W. Dodge Rd,  
Omaha, Nebraska, 68114

**Proposed offerings:**  Course/s only (list courses below)  Program/s  
(please provide a copy of the institutional catalog)

**Course/s:**  
(if not offering a program)

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40 courses will be offered.

**Programs to be offered and Awards to be conferred:**

An 8-course sequence will lead to a certificate in the History of Ideas.

An Associate of Arts degree in Liberal Arts will be offered and will a Bachelor of Arts degree in Liberal Arts.

Descriptions of the programs and the courses are included in **Appendix 1**.

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**Legal Status of the Institution:** Great Books College LLC is a limited liability corporation registered in Nebraska.

- a.  Nonprofit (please provide documents of incorporation, and if available §501(c)(3) status documentation, that provide business name and address; names, titles, and business addresses of all principals in the business)
- b.  For-profit (please provide documents of incorporation or other legal documents that provide business name and address; names, titles, and business addresses of all principals in the business)

**SEE APPENDIX 2**

Is ownership:  proprietorship,  partnership,  corporation?

Has the business, a principal officer in the business, or a shareholder with 25% or more ownership interest in the business filed for bankruptcy during the preceding five years?  yes  no

Please provide the following information in a narrative format. Include copies of pertinent documents where appropriate.

Each numbered, italicized item is a standard identified in state statute. Statutes charge the institution to “demonstrate that it can be maintained and operated in accordance with such standards.” (Neb. Rev. Stat. §85-2406) Each bulleted item should be addressed. Additional information under each numbered item may be included as appropriate to the application.

Institutions applying to offer courses only (not a complete degree program) need only respond to starred (\*) items.

1. *The financial soundness of the institution and its capability to fulfill its proposed commitments and sustain its operations*

- The most recent audited financial statements and a copy of the management letter\* If available, financial statements for the past three years
- Tuition and fees for the most recent academic year or term\*
- Proposed annual budget identifying all sources of income and all categories of educational and general expenditures for the programs
- Explanation of how the interests of students will be protected if the institution were to discontinue its offerings
- Student loan default rate and financial responsibility composite score from the U.S. Department of Education (if applicable)

1a) We are unable to provide an audited copy of our financial statement because we do not have it externally audited. Copies of our internal financial statements for the past three years are attached as [Appendix 3](#). Please note that the expenses incurred over the past three years have been mainly for startup costs associated with the development of the documentary films that exist to support the courses offered by Ricketts Great Books College and the curriculum itself. These financial statements do not reflect the operational budget that will be in place once students begin taking courses.

1b) Tuition for 2024 will be \$390.63 per credit hour or \$6,250 for full-time enrollment (16 credit hours). The Ricketts “Harder You Work Scholarship” Program will refund up to 80% of this tuition to students each semester upon their successful completion of that semester’s courses. This unique scholarship program will ultimately allow students to complete a bachelor’s degree for under \$10,000, exclusive of outside grant or scholarship support.

1c) A proposed annual budget identifying all sources of income and all categories of educational and general expenditures for the programs is attached as [Appendix 4](#).

The following table shows our enrollment targets for the first five years. Students are classified as full-time (16 credit hours per semester), half-time (8 credit hours per semester), or single course (4 credit hours per semester).

<b>Enrollment</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
Full-time	0	0	50	200	350
Half-time	30	60	150	300	500
Single Course	30	100	200	300	400
<i>Total (all types)</i>	60	160	400	800	1,250
<i>Full-time Equivalents</i>	22	55	175	425	700

These numbers assume that we will become fully accredited in 2026, at which point we will join SARA and offer our courses to students outside of Nebraska.

1d) In the event that the institution discontinues its offerings, several steps will be taken to safeguard the interests of the students.

- i) Arrangements will be made with the National Student Clearinghouse to record formal transcripts showing all credits earned and grades received by students while enrolled at the Ricketts Great Books College.
- ii) Arrangements will be made with a third-party company such as Parchment or Green Light Credentials to provide students with a simple online means for requesting copies of their academic records when needed.
- iii) Arrangements will be made with existing colleges or universities with which Ricketts Great Books College has entered into collaborative agreements to provide opportunities for existing students to transfer to those institutions so that they can continue to pursue a degree program centered on a great books curriculum. An example of such an institution is New College Florida.

1e) Student loan default rate. Not applicable.

## 2. *The quality and adequacy of teaching faculty, library services, and support services*

- Number of faculty teaching in the program/s (course/s\*)
- Qualifications of each faculty member (vitae, resume, or other biographical information)\*
- Agreements with online libraries or data sources
- Support services for students such as academic or career advising\*

2a) The number of faculty teaching in the program will be adjusted to reflect student enrollment. Dr Jeffrey Scarborough, Dean of Faculty for Ricketts Great Books College, will teach the initial cohorts of students. Because of the sequential nature of the course of study, he will be able to handle the initial cohorts of students during the first year. As enrollment

increases, we will draw from the 200 faculty members of other institutions who have contributed to the development of the curriculum.

2b) The following individuals are presently engaged as consulting faculty for curriculum development. Their CVs are attached as **Appendix 5**.

- Jeffrey Scarborough – Dean of Faculty
- Erica Brenner – Consulting Faculty
- Chloe Edmondson – Consulting Faculty
- Eric Hagedorn – Consulting Faculty
- Richard Martin – Consulting Faculty
- Gary Rendsburg – Consulting Faculty
- Ian Stewart – Consulting Faculty
- Riccardo Strobino – Consulting Faculty

As we will not begin offering courses to students until after this application has been approved, we are not listing faculty currently instructing at this time. Dr Jeffrey Scarborough will be the instructor for the first cohorts of students who enroll. The nature of our course of study, with its highly prescriptive sequence of courses, means that we will not need to add teaching faculty until we have multiple cohorts of students actively enrolled. Because the goal of providing a low-cost, distance-learning great books college degree is very appealing to many established faculty and scholars, we have no doubts about being able to find faculty as needed.

2c) Agreements with online libraries or data sources. Ricketts Great Books College follows a great-books approach, meaning that students predominately read primary source material. As most books being read are widely available in the public domain, we do not foresee the need to enter into elaborate agreements with online libraries or data sources.

All required books are readily available through online booksellers. Students can also find most texts we will read through Project Gutenberg or similar free archives. Students can also access most books through Libby or other free online library resources. Beyond this, students can secure access to the required texts through online subscription libraries such as the Perlego Online Library for \$15 per month. For students who are enrolled full-time, this approach may have cost advantages; for students who are taking fewer courses, it may be cheaper for them to purchase individual books.

3. *The quality of the programs offered, including courses, programs of instruction, degrees, any necessary clinical placements, and the institution's ability to generate and sustain enrollment*

- Curriculum description/s, including a list of required and optional courses
- Any licensure or certification requirements for the field/s and the way in which the institution will meet them
- Assurance that the institution will be able to secure clinical placements for students in programs that require them
- Assurance that the institution will be able to secure clinical placements for students in programs that require them
- Relationship between the hours of instruction and the credits awarded\*

3a) Descriptions of the courses are attached as [Appendix 6](#).

3b) No licensure or certification is required.

3c) Not applicable.

3d) Not applicable.

3e) Students will have 16 hours of live seminar instruction per credit hour earned.

*4. The specific locations or planned locations for the administrative office*

- Description of the facility\*
- Copies of leases or facility use agreements\*

4a) The administrative office for Ricketts Great Books College will be located at 9140 W Dodge Rd, Omaha, NE, 68114.

The building is a multi-story office building with dedicated parking. Within the building is a suite of offices under a long-term lease to Hugo Enterprises LLC, the holding company of J. Joe Ricketts, the President of Ricketts Great Books College.

Ricketts Great Books College will have a designated set of offices for personnel within this space and access to shared spaces, such as conference rooms and private meeting rooms, and to shared facilities and equipment. As this is purely an administrative office for Ricketts Great Books College, and as all instructional staff will work remotely, we expect this space to be adequate for our needs into the foreseeable future.

4b) A copy of the lease and facility use agreement is attached in [Appendix 7](#), together with the amendment to the lease and a copy of an email clarifying an ambiguous date in the lease. The current space is leased through November 1, 2024, and we expect that the lease will be extended by three additional years at that time.

5. *Assurances regarding transfer of credits earned in the program to the main campus of such institution [if applicable] and clear and accurate representations about the transferability of credits to other institutions located in Nebraska and elsewhere*
- Any articulation agreements with Nebraska postsecondary institutions\*
  - Any other affiliations with Nebraska postsecondary institutions regarding the transfer of credits, joint use of faculty or facilities, or other supportive relationships\*

5) As we are not yet eligible to pursue accreditation, we have not yet entered into any articulation agreements with other colleges or universities regarding the transferability of our credits. We intend to do this as soon as we become accredited.

To prevent any confusion, we will place the following statement, or a statement principally similar in meaning, on our website and all student course enrollment forms once we are approved to offer courses in the State of Nebraska:

All courses at Ricketts Great Books College are offered by distance learning, using a combination of high-quality documentary-style videos and live video-conference seminars that bring students together with each other and with college faculty.

While courses are offered for credit, we make no guarantees of the transferability of the credit. All determinations regarding the acceptance of transfer credits are made by the receiving institution.

Ricketts Great Books College, as a new institution, will not be eligible to seek accreditation until we have been in operation for one year. We intend to pursue formal accreditation at the first possible opportunity.

6. *Whether such institution and, when appropriate, the programs are fully accredited or seeking accreditation by an accrediting body recognized by the U.S. Department of Education*
- Name of the body that accredits the institution\*
  - Status of institutional accreditation, including the date of the most recent accreditation and any required reports or actions\*
  - List of all programmatic accreditations related to the proposed program or courses\*
  - Status of all programmatic accreditations, including the date of the most recent accreditation and any required reports or actions\*

6) As of the time of this application, Ricketts Great Books College has not yet begun the accreditation process because we have not yet satisfied the requirements of having been

approved and licensed within our state and of enrolling students for a full calendar year. We plan to pursue accreditation through the Distance Education Accrediting Commission (DEAC) during the calendar year 2025 once we have been in operation as a college for the required 1-year period.

See **Appendix 8** for the policy statement of eligibility from DEAC.

*7. The institution's policies and procedures related to students, including, but not limited to, recruiting and admissions practices*

- Admission requirements for the institution and programs (if different)\*
- Anticipated methods of recruiting students in Nebraska\*
- Loan procedures

7a) Admissions are open to all qualified students.

Students wishing to join Ricketts Great Books College, whether to take a single course or to pursue a certificate or degree, will undergo a qualification process to determine if they will be a good fit for the program. The qualification process will typically consist of three parts:

- Proof of a high school diploma or its recognized equivalent,
- A Reading Comprehension Test, followed by
- An optional one-weekend Course Experience

Exceptions to this will be made for students enrolling in the History of Ideas course through an arrangement with a collaborating institution, such as for high school dual enrollment. In this case, students will still be expected to pass the reading comprehension test, but they will not be required to provide proof of a high school diploma. In such cases, however, permission to enroll in the course must be granted by a responsible caregiver.

Students who cannot pass the reading comprehension test will be able to take a reading comprehension boot camp, after which they will be allowed to retake the test. The goal of the reading comprehension test and the qualifying process is not to set a high bar to exclude students but to ensure that students come to the course fully understanding what is expected.

### **The Reading Comprehension Test**

The reading test consists of five passages drawn from representative samples of texts that students will encounter in the Ricketts Great Books College. Each passage is between 300 and 700 words and provides an example of the types of text students will be expected to read in the course.

Accompanying each passage are 3-5 questions that students will answer with long-form responses. Requiring students to write answers rather than just select from multiple-choice options gives students a chance to explain the thinking behind their answers. This process will provide significantly more useful information for evaluating students. Completing the exam will also give the students a better sense of what will be expected from them if they take the course.

The following are the authors and texts used on the Reading Comprehension Test.

- Plato, *Crito*, 711 words
- Aristotle, *Nicomachean Ethics I.7*, 456 words
- James Madison, *Federalist 10*, 348 words
- Frederick Douglass, “To My Old Master, Thomas Auld”, 557 words
- John Stuart Mill, *On Liberty*, 491 words

7b) We anticipate recruiting students in Nebraska through a variety of means, including:

- Dual enrollment of high school students interested in taking challenging courses. Such students will be recruited through high school counselors and general outreach efforts to high schools.
- Recent high school graduates looking for a low-cost, high-quality alternative to traditional colleges or universities will be recruited through conventional means such as working through high school counselors.
- Employees at companies who have entered into a cooperative agreement with Ricketts Great Books College to offer free or reduced-price enrollment to employees and their families will be recruited through their HR departments.
- Life-long learners who are interested in the subject matter of the courses being offered and who are driven by intellectual curiosity.
- Social media marketing and other forms of digital marketing.

7c) We are not presently participating in Title IV or supporting students wishing to take loans.

8. *The tuition refund policy for an institution that does not participate in federal financial aid programs described in Title IV of the federal Higher Education Act of 1965 as such act existed on January 1, 2011*

- Copy of the Title IV Program Participation Agreement with the US Department of Education (for institutions participating in federal financial aid programs) or a copy of the tuition refund policy if not participating in Title IV\*

8) We are not presently participating in Title IV.

Our Tuition Refund Policy is provided below. It follows the model policy provided by the Distance Education Accreditation Commission.

### TUITION REFUND POLICY

Students canceling their enrollment within five days of signing the enrollment agreement will be entitled to a full refund of all monies paid to Ricketts Great Books College.

Students canceling their enrollment after five days of signing the enrollment agreement but before the start of the term will receive all their money back, less a one-time registration fee of \$200.

Students registering for a course during a term who subsequently withdraw from that course before the completion of the term will be entitled to a refund of a pro-rata share of the tuition paid for that course, less a one-time registration fee of \$200, together with the pro-rata share of the library service fee. This amount will be further reduced according to when during the term the student withdraws, as shown by the following refund schedule:

A week after which the student withdraws from a course.	Percentage of Tuition Returned to Student Minus Registration and Library Fees
1 <sup>st</sup> week	80%
2 <sup>nd</sup> week	70%
3 <sup>rd</sup> week	60%
4 <sup>th</sup> week	50%
5 <sup>th</sup> week	40%
6 <sup>th</sup> week	30%
7 <sup>th</sup> week	20%
8 <sup>th</sup> week	10%
9 <sup>th</sup> week	0%

No refunds will be available to students who withdraw after the 9<sup>th</sup> week of term.

*This guidance document is advisory in nature but is binding on an agency until amended by such agency. A guidance document does not include internal procedural documents that only affect the internal operations of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules and regulations made in accordance with the Administrative Procedure Act. If you believe that this guidance document imposes additional requirements or penalties on regulated parties, you may request a review of the document.*