



February 27, 2015

Dr. Mary Vanis
Vice President for Accreditation Relations
Higher Learning Commission
230 South La Salle Street, Suite 7-500
Chicago, IL 60604-1411

RE: Adams State University response to January 28, 2015, request for information regarding issues raised in the *Chronicle of Higher Education*.

Dear Dr. Vanis:

This letter and accompanying materials summarize our responses to questions raised in your letter referenced above. I will respond to each issue paragraph by paragraph, with appropriate reference to supporting evidence in the Appendices and report.

Paragraph 1:

Initially, I would say the *Chronicle* articles rely on testimony from Mr. White, who admits he has engaged in nefarious practices for years. I asked whether there were other supporting materials, and you replied the articles are the sum total of the evidence. We did our best to tease out specifics from the articles, but the lack of specificity regarding courses and timeframe for Mr. White's activities makes our response a challenge.

I would partially disagree with your last sentence regarding the statement, "similar types of issues were raised two years ago about Adams State by the same publication." There were no allegations in that instance of lack of student verification and cheating or integrity. Rather, the issue I responded to was the delivery of courses in a compressed time frame, which raised issues of seat time. In response, we ended our Intersession Program and, to Dr. Appleson's satisfaction, proved that on-campus compressed courses met the same criteria in every detail (pass rates, grading patterns) as courses delivered in the 16-week semester format. *See Appendix 1 for our report at that time and Dr. Appleson's response.*

Paragraph 2:

In your first sentence it is unclear to us which courses you are referencing, just as it is unclear exactly which courses Mr. White focused on. For the purposes of this reply, we are assuming they are distance core courses in Math and English that the athletes in question are required to pass by NCAA eligibility rules. These are the courses the NCAA has focused on in investigating specific Division 1 athletes, as I said in my February 5 letter to you. The NCAA has treated Adams State as a partner in this investigation. There has been no allegation that any employee or faculty member at ASU has deliberately engaged in academic fraud. While we do not dispute the need to constantly review and improve our distance education processes as technology improves and as we become aware of possible weaknesses, we do believe we have been in compliance at the policy level.

All of our distance core courses are approved for transfer to any two-year or four-year institution in Colorado. We have repeatedly contacted the officials at Mt. San Antonio College (Mt. SAC) to discuss their issues and to identify which course or courses were in question in the relevant *Chronicle* article. Dr. Novotny has sent several e-mails and received two responses, included in *Appendix 2*. We believe the courses in question and the reputation you mention (based upon the opinions of one official at Mt. SAC and one official at University of Illinois at Urbana-Champaign) are likely Math 155, Integrated Math I, and perhaps Math 106, College Algebra. The latter is a statewide approved Math course through the Colorado gT Pathways Program, which guarantees transfer of general education throughout the state. In reading Dr. Malmgren's explanation, it appears the issue was not rigor, but alignment. The statement by Dr. Malmgren that "numerous topics covered in both our MATH 71 Intermediate Algebra and MATH 130 College Algebra were not covered in your MATH 106 course" is a bit misleading. The primary reason that topics from their MATH 71 are not included in our MATH 106 course is because those topics are covered in our MATH 099 Intermediate Algebra course (a developmental math course at ASU), which is the prerequisite to our College Algebra (MATH 106) -- we don't cover the same material again in MATH 106. Furthermore, while there is not 100% overlap in content between our College Algebra course and the Mt. SAC class, "omission" of material goes both ways: we include some topics (e.g. matrices) in College Algebra that are not covered in any of their courses (based upon their course descriptions). Our curriculum was to some degree influenced historically by a philosophy of using College Algebra and Trigonometry courses as preparation for the Calculus sequence, whereas Mt. SAC has a separate Pre-calculus class. We are not suggesting one version is more rigorous than another, but rather that our respective curricula are developed with different emphases and focus. The Math 155 course, part of a two-course sequence, was designed to assist elementary school teachers in improving elementary Math instruction. This explains the apparent simplicity of the questions provided in the articles (the first problem is certainly easily solved by anyone; the second is more challenging as it is from a test delivered later in the course). We have cancelled Math 155.

It is common practice for institutions to decline transfer credit for courses that do not meet their standards or learning outcomes. I know of no institution in Colorado that does not accept ASU's core courses, but these may not meet the learning outcomes at other institutions in other states. *Appendix 3 includes proctoring policies for Math courses offered through Extended Studies.*

Student verification is an issue we have taken very seriously. It is an issue for every institution for both on-campus and off-campus students. The Federal compliance piece is driven by financial aid qualification issues — these individual distance courses, not part of any degree plan, do not qualify for financial aid eligibility.

In truth, however, it is nearly impossible to verify students who enroll or are enrolled by someone like Mr. White in the print-based correspondence courses and freely give him their identity information, since there are not necessarily face-to-face interactions. If there is proctoring, unfortunately the proctor can be bribed, as explained by Mr. White. Thus, we made the immediate decision to suspend enrollments into our print-based correspondence courses shortly after these issues were raised. We have continued to admit students into our print-based correspondence courses, as we have a well-established proctoring system for incarcerated students.

We are one of the few institutions to continue offering print-based correspondence courses and degrees. The dilemma for ASU is the need to fulfill our role and mission for students in rural areas of Colorado and other states without access to high-speed internet, who may now go unserved because of our policy change. However, as the spreadsheet in *Appendix 4* illustrates, there has been a natural movement away from print-based correspondence toward on-line delivery over the last few years.

Paragraph 3:

Granted, these are important Criteria and obviously core to continuing accreditation, but it is very difficult to determine the extent to which the criteria have been violated by the issues raised in these articles. The evidence standard we are to meet is not stipulated, but we assume that if we address to HLC's satisfaction the questions/issues in Paragraph 5, we will have met the evidence burden. Our current practices and future steps to improve them are addressed in the accompanying report. We have provided ASU policies in reference to the indicated Criterion and Assumed Practice in *Appendix 5*. Policies have been reviewed and re-approved annually by the President's Cabinet. We also assume we will be held to the same standard as any other institution engaged in distance education. Serving the underserved is crucial to our mission, as articulately stated by Dr. Carol Guererro-Murphy, Liaison for Inclusive Excellence. See *Appendix 6*. Many students taking distance courses are underserved — it is not just about revenue — if so, our tuition for correspondence courses would be much higher.

Paragraph 4:

As explained in my letter to you dated February 5, 2015, we have made arrangements with the Colorado Department of Higher Education for a team visit March 3 and 4, 2015. A copy of that letter is attached in *Appendix 7*.

It is certainly HLC's call to determine the necessity of an advisory visit. Please bear in mind that over the next two months, the ASU Board of Trustees will be conducting on-campus interviews for candidates for my successor. As you know, I am retiring effective June 30, 2015. If such a visit is deemed necessary, I request it be coordinated to avoid conflict with the candidates' campus visits. The candidates, who have been announced, are certainly aware of the issues

raised by the *Chronicle*. My job is to resolve these issues before I retire, and I have told our Trustees that I am determined to do so.

Paragraph 5:

The accompanying report describes current practices and steps we are taking to address the issues raised. We have agreed to an external review of our distance education processes and procedures, not only by the Colorado Department of Higher Education on March 3 and 4, 2015, and have held a conference call with team of distance education experts at Excelsior College. We are seeking out options for further external review of our processes and procedures. We are committed to continue to serve students in existing degree programs. While we have suspended new enrollments in our print-based correspondence courses, excluding our prison college program, we are also maintaining print-based correspondence courses as part of a degree plan agreement with a Singapore cohort that will transition to an online program within the next 60 days. We will also enroll ASU on-campus students in their last term who request written correspondence courses to fulfill degree requirements and have the support of their advisor and Vice President of Academic Affairs. We explored the legality of excluding Division I athletes from enrolling in our undergraduate distance courses, but were advised by our legal counsel that such exclusion is not possible for a public institution.

We are confident, with the guidance and advice from these external consultants, that we will be able to resolve any concerns about academic integrity, rigor, and currency of our online and correspondence courses. We are committed to ensuring we meet our role and mission and provide students with a quality education, regardless of delivery method.

Sincerely,



Dr. David P. Svaldi
President

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The following report is to clarify the scope and impact of the issues raised in recent *Chronicle of Higher Education* articles. This report details the steps being taken by Adams State to review and resolve the serious concerns related to these courses. Each section below addresses the specific issues cited in paragraph 5 of the letter dated January 28, 2015, from the Higher Learning Commission's Dr. Mary Vanis, Vice President for Accreditation Relations. The report was written and reviewed by various members of a committee established by President Svaldi. Committee members included the following:

Dr. David Svaldi, President
Dr. Michael Mumper, Senior Vice President for Enrollment Management/Program Development
Dr. Frank Novotny, Vice President for Academic Affairs
Margaret Doell, Assistant Vice President for Academic Affairs
Bill Mansheim, Vice President for Finance and Government Relations
Dr. Matt Nehring, Chair of Chemistry, Computer Science and Mathematics
Judy Phillips, Assistant Vice President for Extended Studies - Operations
Walter Roybal, Assistant Vice President for Extended Studies - Academics
Julie Waechter, Assistant to the President for Communications

“The report should also provide evidence of the institution’s practices related to student verification and security of testing and evaluation protocols, proctor selection and test administration protocol.....”

HLC Policy FDCR.A.10.050-Practices for Verification of Student Identity

HLC Guidelines:

HLC requires that institutions verify the identity of students who participate in courses or programs provided through distance or correspondence education. HLC guidelines state that the institution may use a variety of approaches to verify student identity, which may include (1) secure login and pass code; (2) proctored examinations; and (3) new or other technologies and practices that are effective in verifying the identity of students. Additionally, if the method by which the institution verifies student identity will incur a cost to the student (such as a fee for a proctored exam) the institution must disclose that cost to the student at the time of registration or enrollment. The institution must also demonstrate that it is making reasonable efforts to protect student privacy in verifying student identity.

Adams State University Policy and Practice Related to HLC Policy FDCR.A.10.050:

In order to verify the identity of students, while making reasonable efforts to protect student privacy per FERPA, ASU has developed policy and procedure that students must follow in order to create, or reset, their student username and password. Upon admission or registration, students are provided a communication to set up their original student account. This information instructs them to access an online portal using their student ID and an access code or token number provided to them in the communication. Once the portal is accessed, the student reads and signs electronically an Acceptable Use Policy. See *Appendix 8* for Acceptable Use Policy. Once this is done, the system allows them to create an account and provides a username and password. In order to reset an account in the instance of a forgotten password, students must reset their token number to start the process over

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by contacting authorized personnel at either the campus student One Stop Service Center or ASU's IT help desk.

ASU has established a system wherein students are issued a unique 9-digit student identification number, known as a "900 number," when they are enrolled in classes at Adams State. This number is to be used by the student, and on student records, in order to minimize exposure of a student's social security number.

If the student forgets their username or student ID number, they must provide their date of birth and last four digits of their social security number to obtain their student ID number and reset their account. FERPA regulation stipulates that a student is not required to provide social security number information when registering for classes. Students that have opted out of providing their social security number must provide date of birth and permanent address information as a means of identification verification. ASU Computing Services staff are researching the costs of implementing a "security" or "secret" question system similar to those used on banking sites to further enhance student identity privacy and the security of our system. We are also investigating the use of two-factor authentication, such as texting to a cell phone in our system or emailing to a separate recovery email address to further deter unauthorized access. Only authorized ASU personnel are allowed to reset student accounts. During the password resetting process, ASU logs the activity of authorized personnel to assess how many times certain individuals reset accounts and the dates and times that the reset occurred. Authorized personnel are routinely reviewed to ensure validity of their authorization. Employees leaving ASU employment are purged from the system at the time of their separation of employment.

Given our current protocols and proposed enhancements, it is still important to understand that if the actual student conspires to commit fraud with a third party by willingly and knowingly providing them with their personal information, technical safeguards can only provide a limited level of system integrity. As evidenced through the ASU Extended Studies registration forms, all students are required to adhere to a Statement of Certification when they submit their registration forms. This Statement of Certification addresses consequences for failure to provide current and accurate information, as well as for fraudulently completing the form as someone else. Reference *Appendix 9* for a copy of the content of the online registration form, which includes the Statement of Certification toward the bottom of the page.

Related Appendices:

Appendix 8: ASU Acceptable Use Policy

Appendix 9: ASU Extended Studies Online Registration Form

ASU Testing Security, Evaluation Protocols, Proctor Selection and Test Administration

Protocols:

The Office of Extended Studies takes exam processing and academic integrity very seriously. The department operates with clear exam policies and continuously reviews policies and procedures to maintain the highest possible level of academic integrity. Examinations within the distance learning environment create some unique challenges and at the same time allow for the use of technology to improve test administration. Since the department offers courses in print-based correspondence and online, it is necessary to have specific processes for each delivery mode, as summarized in current policies, procedures, and processes for the two delivery methods below:

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Print-Based Correspondence:

The Office of Extended Studies serves as a processing center for the delivery of examinations which require live proctoring and administration. Exams are stored in a secure location within the department which have, at minimum, four security measures of access. These include outside entryway security, departmental entry security, file room security, and file cabinet security. All of these security measures require access by key assigned to appropriate staff. Exams are secured with limited access to two staff members within the Extended Studies department. These two staff members are continuously monitored to ensure integrity of exams is maintained at a high level. In addition to the file cabinet containing hard copies of exams, the department also maintains a shared directory of the exams in electronic format with limited access to the same staff members who have access to the hard copies of the exams. Access to these files is also secured by password and continuously monitored.

The Office of Extended Studies maintains an exam database to track exam requests from the point of submission through the completion of the exam. The database includes the student's name, the proctor information, request dates, processing dates, certification dates, and any unusual issues within the exam process. This database is used to verify exam certificates completed by the proctor; any abnormalities are presented to the instructor of the course. Recent changes in processing resulted in completed exam request forms and proctor certificate documents being scanned and attached to the student's file in the student information system. The Office of Extended Studies provides support through the process by providing the instructor with information on file related to the exam and exam request. Identified integrity issues with the proctor or proctor certificate result in notification to the instructor for the course. The instructor is responsible for initial penalties, according to the academic integrity statement posted in their course syllabus. Proctor integrity issues are noted in the exam database to prevent the use of these proctors for future exams. See *Appendix 10* for a sample syllabus template reflecting a required academic integrity statement. Penalties can include failure of an assignment and/or possible failure of the course. Students are notified of the examination process through Guidelines for Proctored Exams found in their course. Reference *Appendix 11*. In addition, the Office of Extended Studies website provides information on exam processing in Frequently Asked Questions (FAQ) found in *Appendix 12* and in Course General Instructions found in *Appendix 13*. The flowchart in *Appendix 14* further details the exam request process.

Online Courses Proctoring and Exams:

Exams offered online through the Office of Extended Studies are hosted in Blackboard. Instructors are required to complete an online training course, TEED 589 - From the Classroom to the Web, prior to developing and offering courses. Please reference *Appendix 15* for a copy of TEED 589 course syllabus. The training course provides the potential instructor with useful tools and tips on how to develop exams (assessments) within the online environment. Some of the methods used to curb plagiarism or issues of academic dishonesty are to randomize test questions, utilize the timed exam features, utilize Kryterion Konnect or Kryterion Online Proctoring Solution, and use anti-plagiarism software such as Turnitin.com.

Courses which require proctoring are facilitated in two ways. First, the instructor can opt to utilize the live proctoring process used in print-based correspondence courses. This requires the instructor to provide Guidelines for Proctored Exams within their course and to provide the student with exam request forms to be downloaded, printed, completed, and submitted to the Office of Extended Studies for processing. The second option is to utilize online proctoring through Kryterion Konnect or Kryterion Online Proctoring Solution. Both of these online proctoring tools require the student to meet

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system requirements and to utilize a web camera and microphone. When an instructor utilizes these proctoring programs, the instructor is required to disclose the system requirements and proctoring costs on the first page of the course syllabus. In addition, the Office of Extended Studies identifies courses with this requirement on the website and indicates there are hardware requirements and a fee for the proctoring of exams. This is done to maintain transparency with the student and to allow the student ample time to prepare to meet the requirement. Below is a summary of the key features of each of the online proctoring tools:

Kryterion Konnect:

- Student is required to go through a 4 step set up with Kryterion before taking their first exam.
 - Student is required to test equipment.
 - Student is required to download and install Sentinel Secure, Kryterion's lockdown browser.
 - Student enters their biometric profile. The student will be prompted to type his/her name 5 to 8 times for Keystroke Analysis and will be prompted to take his/her image for Facial Recognition.
 - Student is required to pre-schedule their exam.
- At exam time, the student is required to enter their biometric information.
- Student's browser will be locked down.
- A trained Kryterion proctor will observe the student while testing.
- The exam session is recorded.
- The proctor sends alerts if the student exhibits aberrant behavior.
- Instructor can access the exam session recording through Blackboard.

Kryterion Online Proctoring Solution:

- Student is required to establish online account with Kryterion.
- Kryterion utilizes trained proctors from a central location to observe and administer the online exams. Student is required to show a government issued ID before starting an exam as a primary form of authentication.
- An image of the government issued ID is recorded.
- Student is required to respond to 4 multiple choice, unique, personal questions generated randomly by ACXIAM's national database as a secondary level of authentication.
- Exams are password protected, and only the proctor can provide access to the exam.
- Before exam begins, the proctor takes over the student's desktop to input the password and then hands the desktop back to the student for testing.
- If the proctor notices aberrant behavior during an exam s/he warns the student to stop the behavior, and notes the aberrant behavior in the exam session report.
- If the student opens another browser to search for answers, the proctor will take a screenshot and tell the student to go back to the exam. These screenshots become part of the exam session report.
- Instructor gets a written report 24 hours after the exam session ends.

Next Steps:

As the undergraduate distance learning program at ASU grew over the years, continuous review and change of exam proctoring policies and procedures have taken place to address new ways students exercise academic dishonesty. The list of suitable proctors has been updated to exclude the use of athletic administrators, athletic coaches, and assistant coaches. Both the Mathematic and English

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departments have instituted required proctored assignments and/or exams and the use of anti-plagiarism software such as Turnitin.com in their courses. The requirements of these departments are detailed in *Appendix 16*.

On January 15, 2015, as a result of the recent allegation in the *Chronicle of Higher Education*, Adams State University froze all print-based correspondence courses for all students except those in the prison college program (students in the prison college program are required to provide their prison ID number and are required to utilize correctional education officials for exam proctoring). Students currently enrolled in the courses are allowed to finish them; however, all instructors have been notified of the change and, to make sure they increase their awareness of students enrolled in the courses, to identify issues of academic dishonesty in the courses. Since the freeze in print-based correspondence courses, Adams State has instituted an authorization process to allow for hardship consideration for exceptional individual cases. Students who can demonstrate a barrier to access to higher education and can address how they will maintain academic integrity in the print-based course are reviewed on a case-by-case bases. Students requesting the authorization are required to submit an authorization request form which must be signed by the student and approved by their academic advisor and the designee from the Office of Academic Affairs. Please reference *Appendix 17* for a copy of the press release from January 15, 2015, and a copy of the authorization request form.

In addition to this measure, Adams State will take the next several months to review policies and procedures and to develop academic integrity standards that the print-based courses must meet before they can be offered to the general public again. Some of ideas being considered include:

- Continuing to restrict enrollment to incarcerated student enrollment only.
- Restrict face-to-face proctoring to Adams State University verified testing centers only.
- Establish process of identity verification with profile matching of ASU data for off-site, face-to-face proctoring.
- Institute online or face-to-face proctoring in all general education English and Mathematics courses, along with exam randomization.
- Require added layers of student verification at the point of registration and at various stages of course completion.
- Explore additional online proctoring products which provide added layers of student authentication and verification.
- Consult with experts in distance learning to review processes and to align them with best practices in the industry. This consultation will take place within the next 6 to 9 months. See *Appendix 18* for the consultation proposal.
- Coordinate a site visit from the Colorado Department of Higher Education on March 3-4, 2015, to review policies and procedures related to the *Chronicle of Higher Education* articles. See *Appendix 7*.

Related Appendices:

Appendix 7: Dr. Svaldi Letter dated February 5, 2015

Appendix 10: Print-Based Correspondence Syllabus Template

Appendix 11: Guidelines for Proctored Exams

Appendix 12: ASU Extended Studies FAQ

Appendix 13: Extended Studies Course General Instructions

Appendix 14: Exam Request Flowchart

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Appendix 15: Syllabus: TEED 589 From the Classroom to the Web

Appendix 16: English and Math Department Policy Letters

Appendix 17: Authorization for Print-Based Correspondence Courses through ASU Extended Studies

Appendix 18: Consultation Proposal

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“The report should also provide evidence of the institution’s practices related to.....the academic content and integrity of the courses to ensure currency of the content and appropriateness of the evaluation protocols; the appropriateness of the credit hour assignments related to these courses; and a review of the quality of the on-line and correspondence courses and how they align with the University’s policies related to transfer of credits and articulation with other institutions.”

Overview:

Assuring the rigor of academic content and integrity of all courses at ASU is paramount to provide ASU students and graduates with an academic experience and degree that is current and relevant, as well as to meet ASU’s mission to educate, serve, and inspire our diverse populations in the pursuit of their lifelong dreams and ambitions.

In order to ensure the consistent quality of ASU’s courses and programs, distance courses are modeled after the corresponding on-campus courses. The review processes, described later, includes a review and approval by Extended Studies personnel, a review and approval by Department Chair of the content area who is considered a subject matter expert, and also a review and approval by the Assistant Vice President of Academic Affairs (prior to January 2014, the review as done by the Vice President of Academic Affairs). While labor intensive, the process is in place to ensure to the best of our abilities that distance courses have the same learning outcomes and rigor as our on-campus courses.

On-Campus Course Creation Process:

The courses discussed in the article (along with all other general education and required courses for a degree) are developed for distance courses based on the on-campus course. On-campus courses are developed by the respective department and sent to the Curriculum Review Committee (CRC) for review under Academic Policy 100-08-01 Curriculum: New Course Approval & Course Changes, referenced in *Appendix 19*. If the course meets general education requirements, the department that delivers the general education course is responsible for ensuring that the institutional syllabus aligns with the goals for general education. The department is responsible for ensuring that individual instructor syllabi align with the approved institutional syllabus including type and level of evaluation of students. The institutional syllabi for all general education courses are reviewed and approved by both the CRC and the General Education Coordinating Committee (GECC) to ensure student learning outcomes, course content and align with, and measure goals for, general education at Adams State University.

Current Extended Studies Process:

The Extended Studies review process starts with completion of a course initiation form, *Appendix 20*, which must be completed by a potential instructor who is interested in teaching an ASU online or correspondence course. The Department Chair from the relevant on-campus department reviews the proposed course description, student learning outcomes, and course requirements, as well as the credentials of the interested party.

If approved, the potential instructor is notified of the course and credential approvals and is sent the guidelines for course development, print-based or online course templates, and a copy of the CRC approved institutional syllabi for the course. Reference *Appendix 21* for guidelines for course

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development and templates. Instructors who teach online are required to enroll in and successfully complete the TEED 589 - From the Classroom to the Web training course. Reference *Appendix 15* for a copy of the TEED 589 From the Classroom to the Web course syllabus.

The instructor works with the quality assurance unit of Extended Studies to develop the course. If the course will be offered online, the Academic Instructional Technology Center (AITC) provides Blackboard technical support. Upon completion of course development by the potential instructor, AITC conducts an online course review based on best practices as defined by the WICHE Cooperative for Educational Technologies (WCET). These best practices were developed by the eight regional accrediting commissions in response to the emergence of technologically mediated instruction offered at a distance as an important component of higher education. Reference *Appendix 22* for a copy of the QA Online Checklist. The quality assurance unit works with AITC and the instructor to resolve any issues identified through the checklist process. Once the initial course creation is reviewed and approved by the quality assurance unit of Extended Studies, a hardcopy is sent to the Department Chair of the appropriate academic department to review the course for appropriateness of content, quality, rigor, student learning outcomes, overall course structure, etc. The Chair reviews the course, with the option to send the course back for further revisions, to approve the course through her/his signature, or reject the course. Once the Chair approves the course, it is routed for review and approval to the Director of Quality Assurance in Extended Studies, the Assistant Vice President for Extended Studies-Academics, the Assistant Vice President for Academic Affairs, and finally to the Extended Studies Operations Manager for Distance Learning. After the last signature, the course is approved for three years from the date of approval. After three years, the course will be reviewed and revised by the instructor and put through the process again. Course approvals are tracked on a database managed by the quality assurance unit to ensure the instructor is appropriately notified at the requested time of revision and re-approval. Any major changes to the course prior to the three year renewal date constitutes an early review and re-approval following the same protocols. The complete process from course development to course approval for distance courses is provided in *Appendix 23*.

To ensure that ASU degree offerings are current and relevant, academic programs undergo a five-year program review on a rotating basis in accordance with Academic Policy 100-08-05 Curriculum: Program Reviews (See *Appendix 24*). The program review follows the CRC program review guidelines found in *Appendix 25*.

**HLC Policy FDRC.A.10.020: Assignment of Credits, Program Length, and Tuition:
Federal and HLC Guidelines:**

Federal Credit Hour Definition: A credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally-established equivalency that reasonably approximates not less than:

(1) one hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work each week for approximately 15 weeks for one semester or trimester hour of credit, or 10 to 12 weeks for one quarter-hour of credit, or the equivalent amount of work over a different amount of time; or (2) at least an equivalent amount of work as required in paragraph (1) of this definition for other activities as established by an institution, including laboratory work, internships, practica, studio work, and other academic work leading toward to the award of credit hours. 34CFR 600.2 (11/1/2010)

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Commission Review: The Commission shall review the assignment of credit hours, program length, and tuition in conjunction with a comprehensive evaluation for reaffirmation of accreditation during the Commission's assurance process. The Commission may sample or use other techniques to review specific institutional programs to ensure it has reviewed reliability and accuracy of the institution's assignment of credit. The Commission shall monitor, through its established monitoring processes, the resolution of any concerns identified during that evaluation with regard to the awarding of academic credit, program length, or tuition, and shall require that an institution remedy any deficiency in this regard by a date certain, but not to exceed two years from the date of the action identifying the deficiency.

Adams State University Policy and Practice Related to HLC Policy FDCR.A.10.020:

Pursuant to HLC and Federal requirement FDCR.A.10.020, Adams State University's policy and practice for the assignment and award of credit hours associated with the undergraduate courses referenced in the *Chronicle* article conform to commonly accepted practices in higher education. Adams State's Academic Policy 100-09-02 outlines the number of credit hours required to earn a baccalaureate degree. Reference *Appendix 26*. ASU Academic Policy 100-05-12 details guidelines for credit hour assignment of online and hybrid courses in order to align with Colorado Commission on Higher Education recommendations. Reference *Appendix 27*. Credit awarded for courses delivered in different instructional modes, such as print-based and online courses, are comparable to courses delivered in a traditional, site-based format in course requirements, student learning outcomes expectations, type and level of student evaluation, and time commitments.

The specific number of course credit hours is established as part of the course creation process within a program. Faculty members make credit-hour recommendations based on course requirements, student learning outcomes, and time commitments, to their department Chair. After the Chair approves the course, including the credit-hour recommendations, the ASU Curriculum Review Committee evaluates proposed courses and programs to ensure they meet the credit- and contact-hour requirements, along with other requirements. Reference ASU Academic Policy 100-08-01 in *Appendix 19*.

Courses are evaluated based on the policy and the State requirement of 750 minutes of contact/seat time per credit hour (for labs, studios, field instruction, etc., it is 2-3 times that). Reference *Appendix 28*, starting on page 8 for state requirements. Print-based courses have the same learning outcomes as face-to-face courses or online. In print correspondence courses, content is reviewed to ensure that the students must produce the equivalent amount of assessed work as through online and face-to-face classes.

Next Steps:

In reviewing our processes and procedures designed to ensure currency of the content and appropriateness of the evaluation protocols, there are some definite strengths, but also some areas that could be improved upon. In the next several months ASU will:

- Have a site visit by the Colorado Department of Higher Education and an external consultant on March 3-4 to review current policies and procedures.
- Contract with distance learning experts to review distance policies and procedures (completed in the next 6-9 months). Reference *Appendix 18*

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- Establish an overarching program review process for Extended Studies programs to have an external review of ES policies and procedures every 3 years.

Related Appendices:

Appendix 15: Syllabus: TEED 589 From the Classroom to the Web

Appendix 18: Consultation Proposal

Appendix 19: ASU Policy 100-08-01: New Course Approval and Course Change

Appendix 20: ASU Extended Studies Course Initiation Form

Appendix 21: ASU Extended Studies Course Development Guidelines and Course Templates

Appendix 22: ASU Extended Studies/AITC Quality Assurance Checklist

Appendix 23: ASU Extended Studies Course Approval Flowchart

Appendix 24: ASU Policy 100-08-05: Curriculum: Program Reviews

Appendix 25: ASU Curriculum Review Committee Program Review Guidelines

Appendix 26: ASU Policy 100-09-02: Degree Requirements: Number of Credit Hours BA/BS Degrees

Appendix 27: ASU Policy 100-05-12: Hybrid and Online Course Credit Hour Assignment

Appendix 28: Colorado FTE Reporting Guidelines and Procedures

“The report should also provide evidence of the institution’s practices related to:.....a review of the quality of the on-line and correspondence courses and how they align with the University’s policies related to transfer of credits and articulation with other institutions.”

Transferability of ASU courses to other Institutions

Adams State has no direct way of knowing whether other institutions of higher education accept transfer credit for courses taken at ASU. Each institution makes that determination for itself on a case-by-case basis. However, ASU prides itself on the quality of our courses, and we go to great lengths to ensure they are of appropriate quality and rigor. We know many institutions do accept ASU credit, because we regularly receive good standing letters indicating the student's eligibility at their home institution to accept ASU credit. *Appendix 29* provides specific letters of evidence demonstrating the acceptance of Adams State online and correspondence-based courses to other institutions of higher education. Students often contact ASU for assistance with transferring credit to their home institution. As evident in the ASU Extended Studies FAQ webpage, *Appendix 12*, students are provided guidance on the process to seek transfer approval at their home institution. In addition, ASU clearly states that the final decision on transfer credit is the responsibility of the institution accepting the credit. As a final measure, it is recommended the student seek written approval and permission from their home institution for transfer consideration prior to enrolling in ASU courses. ASU is transparent in providing course descriptions through the website and regularly provides copies of syllabi and course information when requested. This information is regularly communicated to students through phone, email, and in face-to-face settings. ASU staff is regularly trained to provide consistent responses to students who inquire regarding transfer of credit from ASU to their home institution.

gT Pathways & Transferability of Courses.

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One means of ensuring ASU's courses meet the standards necessary to transfer to other institutions is participation in the statewide program that guarantees transfer of general education courses within Colorado. Adams State University participates in the State of Colorado's Guaranteed Transfer program for general education, gT Pathways. This ensures that all approved ASU courses must be accepted at all other Colorado institutions of higher education.

gT pathways includes 31 credits of general education coursework in Communications, Arts & Humanities, Social & Behavioral Sciences, History, Science and Mathematics. Adams State's own general education curriculum includes all the gT Pathways requirements, plus 6 additional credits in Arts & Humanities and Social & Behavioral Sciences or History. All ASU's general education courses have been approved for gT Pathways. Approval first requires approval at the campus level through the General Education Coordinating Committee (GECC), a committee comprised of tenured and tenure track faculty. After campus approval, courses are submitted for state approval, which constitutes review by a statewide committee of faculty from two-year and four-year schools. Courses must meet state-established criteria for general education competencies, as well as content requirements.

Please reference *Appendix 30* and *Appendix 31* for the gT Pathways content criteria and expected competency criteria that the Colorado Department of Higher Education uses to determine if a particular courses qualifies for gT Pathways status.

ASU also participates in Statewide Transfer Articulation Agreements. STAA are agreements among Colorado community colleges and universities. These agreements allow a student to graduate from a community college with a 60-credit Associate of Arts (A.A.) or Associate of Science (A.S.) degree with designation, such as an Associate of Arts in Business; enroll with junior status at a university; and complete the bachelor's degree in no more than an additional 60 credits (for a total of 120 credits). STAA's are comprised primarily of the gT Pathways curriculum, plus a prescribed set of courses that apply to the major. By fall of 2014, ASU had transitioned all of its transfer agreements within the state to Statewide Articulation Agreements. These include STAA's for the following degrees and are referenced in *Appendix 32*:

- Biology
- Business
- Economics
- Early Childhood Education
- Elementary Teacher Education
- English
- Geography
- Geology
- History
- Mathematics
- Music
- Political Science
- Psychology
- Sociology
- Spanish
- Studio Art
- Theatre

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ASU's efforts to align its general education curriculum with state expectations, and its participation in the STAA's, ensures that ASU general education courses, including the general education Math and English courses questioned in the articles, are equivalent to those of other institutions. The specific content and learning outcomes in the courses are probably not identical to the content and learning outcomes of courses at other institutions, but the rigor and expectations of the course are appropriate for the course level and discipline.

Related Appendices:

Appendix 12: ASU Extended Studies FAQ

Appendix 29: Good Standing Transfer Letters

Appendix 30: gT Pathways Content Criteria

Appendix 31: gT Pathways Competency Criteria

Appendix 32: Statewide Articulation Agreements Specific to Adams State University

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“Finally, include in the report information about any other inquiries or investigations being conducted by the state or any entity related to these particular courses, handling of student athletes or related matters.”

Appendix 7 details the status of inquiries or investigations being conducted by the state or any entity related to these particular courses. As a point of clarification, ASU is not currently under investigation by the NCAA, but rather, is cooperating with the NCAA as they identify specific information needed for their investigation of NCAA student-athletes. Reference an email exchange with an NCAA representative in *Appendix 33*.

Related Appendices:

Appendix 7: Dr. Svaldi Letter Dated February 5, 2015

Appendix 33: NCAA Email Exchange