REPORT OF AN

ADVISORY VISIT

TO

ADAMS STATE UNIVERSITY
Alamosa, CO

September 14-15, 2015

The Higher Learning Commission

A Commission of the North Central Association of Colleges and Schools

EVALUATION TEAM

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CONTENTS

I.   CONTEXT AND NATURE OF VISIT

A.   Purpose of Visit

The visiting Team conducted an Advisory Visit at the request of the President of the Higher Learning Commission. The visit was prompted by concerns related to the conduct of Adams State University (ASU) online education. As specified in correspondence from the Commission to the institution, concerns related the University's compliance with HLC's Criterion Two Integrity: Ethical and Responsible Conduct, particularly Core Components 2.A., The institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows policies and processes for fair and ethical behavior on the part of the governing board, administration, faculty, and staff; 2.B.,The institution presents itself clearly and completely to its students and to the public with regard to its program, requirements, faculty and staff, costs to students, control, and accreditation relationships; and 2.E., The institution's policies and procedures call for responsible acquisition, discovery and application of knowledge by its faculty, students, and staff. In addition, the institution's conformity with Assumed Practice B, Teaching and Learning is also in question as well as the institution's compliance with Commission Policy FDCR.A. 10.020 Assignment of Credits, Program Length, and Tuition, and Commission Policy FDCR.S.10.050 Practices For Verification of Student Identity, which are policies that outline some of the Commission's requirements to ensure that its affiliated institutions comply with federal regulations.

B.   Accreditation Status

Adams State University is an accredited institution.

C.   Organizational Context

Subsequent to the publication of an article in the Chronicle of Higher Education in December 2014 suggesting possible lax processes in the conduct of online instruction and operations at Adams State University, coupled with a previous concern in online instruction cited in 2012, and an institutional response sent to the HLC in February 2015 that was deemed insufficient information for a determination on the status of issues, HLC's president determined that a campus visit should be conducted. The 2012 concern related to a compressed timeframe/seat time for course offerings. The matter was reviewed and the institutional response was determined to be sufficient. The nature of the comments in the December 2014 article suggested that HLC Criteria, an Assumed Practice and HLC Policies might be compromised. Accordingly, it was determined that special monitoring through an Advisory Visit would be scheduled in September 2015.

In response to the article, the university itself hosted two external reviews of their online instruction: the first was conducted by the Director of Programs and Membership for the WICHE Cooperative for Educational Technologies (WCET) and the Academic Policy Officer of the Colorado Department of Higher Education (CDHE); this visit took place in March of 2015. The second visit was conducted by a distance education consultant at the request of

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the Colorado Department of Higher Education. The reports submitted by these individuals noted both academic and operation policies and processes that appeared to work well and were consistent with convention and practice in online offerings. Both reports also identified issues that called for institutional attention citing features that could be strengthened; the reviewers offered advice and suggestions for improvement.

It is important for the reader to note that Adams State University offers three types of "remote" course offerings: an online semester-based format (OSB); online/open enrollment (OE) defined as "correspondence" that may be completed by the student over a period of up to one year and print-based (PB) instruction that is available to the public as well as a prison population that the university has served for some years.

The institution's last Comprehensive Visit took place in 2006-2007 and the next scheduled Comprehensive visit is scheduled for 2016-2017.

D.   Unique Aspects of Visit

The Team was accompanied by ASU's HLC institutional liaison and Vice President for Accreditation Relations.

E.   Interactions with Organizational Constituencies

President
Vice President
Assistant VP for Academic Affairs
Assistant Vice President Academics Extended Studies
Assistant Vice President Operations Extended Studies
VP for Finance and Governmental Relations
Operations Manager for Distance Learning
Director of Financial Aid
Project Manager-Enrollment Management
Chief Information Officer
Manager of Systems Information and Networking
Director of Advisement and Recruitment
Student Advisor/Recruiter
Interim Director of AITC
Instructional Trainer and Designer
Advisor/Coordinator of AITC
Director Human Resources
Department Chairs: Chemistry, Computer Science and Mathematics; History, Anthropology, Philosophy, Political Science and Spanish; English, Communications
Director of Academic Quality Assurance
Operations Manager for Distance Learning
Special Projects Director for Extended Studies
Administrative Assistant for Extended Studies
Extended Studies (2) Students

(6) Faculty in Extended Studies [one attended through Skype]

F.   Principal Documents, Materials, and Web Pages Reviewed

HLC correspondence files with Adams State University
2015 Higher Education Security Report – report by Security Scorecard
MIT, Cambridge, Other Universities Get D's in Internet Security – article In Risk
Modules 3, 5, 8, 12, 13, & 14 of the TEED 598 instructor training course
Online Course General Instructions
Unauthorized Activity Description from Kryterion for a math course
Extended Studies Instructor Agreement Final Distributed
DistanceEdBlankPmtOrdr
Online Transcript Requests Sept.-14 to Sept.-15
Transcript Request Report Sept.-14 to Sept.-15
08-28-015 Student Verification Meeting Minutes
ES Syllabus template-Student Identity Verification Statement
Undergrad Admitted Student Checklist
Faculty Handbook
Student Handbook
OLC-OSB Continuing Student Notification
OLC-OSB New Student Notification
PBC Student Notification
Audit of faculty resumes
Courses_5yrs_compiled-9-14-15
Enrollment Breakdown with revenue by delivery type: Summer 2010-2014
OSB Course Checklist
OSB Course Reviews
Online Course Checklist
    https://www.adams.edu/academics/ https://www.adams.edu/admissions/
    http://www.adams.edu/pubs/media/fac-handbook-current.pdf
    https://www.adams.edu/extended_studies/undergrad/how_to_apply.php
    https://www.adams.edu/admissions/undergraduate/admit_transfers.php
    https://www.adams.edu/extended_studies/undergrad/index.php
    https://www.adams.edu/extended_studies/undergrad/international_student_admission.p
    hp https://www.adams.edu/extended_studies/undergrad/military_policies.php
    https://www.adams.edu/extended_studies/professional-development/index.php
    https://www.adams.edu/collegehs/index.php https://www.adams.edu/extended_studies/
    https://www.adams.edu/extended_studies/undergrad/
    https://www.adams.edu/extended_studies/undergrad/transferring-credits.php
    https://www.adams.edu/extended_studies/undergrad/academic-integrity.php
    https://bannerweb.adams.edu/perl/xsreg_prod.pl?page_id=distlrng_fall
    http://www.adams.edu/extended_studies/undergrad/advising-staff.php
    http://www.adams.edu/about/fast_facts.php http://www.adams.edu/finaid/esfaq.php
    https://www.adams.edu/finaid/costs-to-attend.php
    https://bannerweb.adams.edu/perl/catalog.pl
    http://www.adams.edu/pubs/media/personnel-handbook-09-2-08.pdf
    http://www.adams.edu/trustees/trusteepolicymanual.pdf

http://www.adams.edu/pubs/mission.php
http://www.adams.edu/academics/psych/index.php
http://www.adams.edu/academics/business/index.php
http://www.adams.edu/academics/ba-is.php
http://www.adams.edu/academics/hppe/undergraduate/index.php
http://www.adams.edu/academics/hgp/index.php
http://www.adams.edu/academics/english/index.php
http://www.adams.edu/academics/music/index.php
http://www.adams.edu/academics/soc/index.php
https://www.youtube.com/playlist?list=PLM1XIDdQr4T6oM_7G6CvJ3mYw7-jhLok2
(Onestop video site) http://www.adams.edu/irb/index.php
http://www.adams.edu/irb/researchaspartofacourse.php
http://www.adams.edu/library/resources/research_guides.ph**p**
http://www.adams.edu/library/services/distance.php https://www.adams.edu/library/how-to/plagiarism.php http://www.adams.edu/library/how-to/copyright.php
http://www.adams.edu/academics/transfer/index.php
http://www.adams.edu/extended_studies/undergrad/transferring-credits.php
http://www.adams.edu/academics/ait/ http://www.adams.edu/academics/ait/aitc.php

ASU catalog: review of degree offerings
February 2015 ASU correspondence with HLC
August 2015 report prepared for Advisory Visit
Courses Reviewed in Blackboard:
OE-AR103-2
OSB-SP15-BUS103
OE-BUS103
OSB-SP15-BUS120
OSB-SP15-BUS211
OSB-SP15-BUS320
OSB-SP15-BUS345
OE-BUS345
OSB-SU15-MUS100
OE-MUS100
OE-HPPE120-2
OSB-FA13-HPPE120
OSB-SU15-HIST202
OSB-SP15-HIST202
OE-HIST202-2
OE-GOVT436
OE-HGP471
OE-HIST202
OE-HIST202-2
OE-HIST203
OE-HIST203-2
OE-HIST316
OE-HIST342
OE-HIST357
OE-HIST363

OE-HIST433
OE-HIST435
OE-HIST436
OE-PHIL436
OE-POLS436
OSB-SP14-GOVT291
OE-GOVT291
OSB-SU13-GOVT436
OE-HIST436
OSB-SP14-SOC245
OE-SOC245
OSB-SU14-SOC245
OE-SOC320
OE-SOC395
OE-SOC419
OE-SOC419-2
OE-SOC455
OE-SOC455-2
OSB-SP15-PSYC245
OE-PSYC245-2
OE-PSYC204
OSB-FA14-ENG101
OE-ENG101
OE-ENG101
OE-ENG102
OE-ENG101
OSB-FA13-ENG101
OSB-FA14-ENG102
OE-ENG101
OE-ENG101
OSB-SP15-ENG363
OE-MATH104JC-2
OE-MATH104JHG
OSB-FA14-MATH104
OE-MATH104
OSB-SP15-MATH104
OE-MATH106
OSB-FA13-Math106
OSB-MATH106
OSB-SU13-Math097
TEED598 SP15-2 From the Classroom to the Web
Fall 2015 online offerings: SOC 318, ART 103, ENG 259, MATH 099,ENG 101, BUS 418, MATH 155 &156, Math 104, ENG 203, GOVT 436, HPPE,410, HPPE 120, ENG 311, MUS 379

October 20, 2015

II.   AREA(S) OF FOCUS

A-1. Criterion Two. Integrity: Ethical and Responsible Conduct. The institution acts with integrity; its conduct is ethical and responsible.

Core Component 2.A: The institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows policies and procedures for fair and ethical behavior on the part of its governing board, administration, faculty, and staff.

B-1. Statements of Evidence

•   **Evidence that demonstrates adequate progress in the area of focus.**

Adams State University (ASU) actively pursues its stated mission and vision, "To educate, serve, and inspire our diverse populations in the pursuit of their lifelong dreams and ambitions," and "…to become the university community of choice for diverse, historically underserved groups, and all who value quality education and inclusivity." In pursuit of the mission and vision, ASU values several areas, including but not limited to "…innovation, integrity, and ethical leadership" as well as "responsible stewardship." Through numerous on-site interviews with personnel at all levels it is clear that the offering of Extended Studies courses is viewed as an integral component to the fulfillment of the mission and vision. Accordingly, ASU has incorporated numerous policies and procedures to ensure distance learning activities are in accord with the institution's stated values. Administration, faculty, and staff work diligently to protect the integrity of the institution and firmly believe that Extended Studies activities are in accord with the values of the institution.

Adams State University's online operations have come under intense scrutiny and the integrity of some practices have been called into question by outside entities. In partial response to these concerns the university conducted its own internal review of Extended Studies operations and academics. Additionally, ASU hosted two external independent reviews from members of the Colorado Department of Higher Education and WCET organizations. Conclusions made in these reviews/reports parallel those of this Team, i.e., that ASU has used the intensified focus on the institution as an opportunity to analyze existing policies and procedures and work toward improving itself as a fair and ethical institution.

As an example of actions ASU has taken to protect its integrity, the institution has halted the offering of all print-based courses for students other than those in the prison college program until it can effectively update policies and procedures that will safeguard the integrity of these courses. During the visit, personnel confirmed that the adoption of a new policy requiring the use of verified testing centers or national testing sites was forthcoming, as recommended in the WCET report. ASU staff also confirmed that only after a new student identification policy was in place would the institution be prepared to reopen print-based courses to all students. The policy means an improved security assuring student identity since all testing must be scheduled at a verified testing center. The reopening of PB courses is scheduled for January of 2016.

Another key action that ASU has taken in an effort to better coordinate financial, academic, personnel, and auxiliary functions is the reorganization of administrative appointments that directly connect Extended Studies to the Vice Provost for Academic Affairs. Prior to this organizational change the Director of Extended Studies did not directly report to academic administration which contributed to a view that Extended Studies was a stand-alone or distinct entity from other academic units at the university. However, the restructuring process resulted in the position of Assistant Vice President for Academics within Extended Studies, which reports directly to the Vice President for Academic Affairs. Staff who discussed this change during the site visit overwhelmingly report that the change has helped integrate and coordinate Extended Studies and on-campus academic interests.

The Team's review of ASU's Extended Studies Action Plan confirms that ASU has recently reviewed and/or updated many of its policies and procedures related to fair and ethical behaviors. Some that stand out as particularly notable in demonstrating the institution's efforts in maintaining the integrity of its Extended Studies offerings include becoming a NC-SARA approved institution, updates to the Academic Integrity Policy, and the passing of a regulation specifying that students cannot complete a 3-credit online course in less than 6 weeks or in some cases not less than 8 weeks. These policy updates along with many others directly reflect the ongoing efforts being undertaken to safeguard institutional integrity. The Plan also identifies many additional areas for review during the 2015-16 academic year that are expected to culminate in changes and improvement in management, security and operation of online education.

- **Evidence that demonstrates that further organizational attention is required in the area of focus.**

In exploring instructor workload and compensation the Team learned that all faculty teaching in Extended Studies are compensated at the rate of $75 per cr. hr. per student, i.e., $225 per student for a 3 cr. hr. course. [With some course enrollments ranging from 450-600 students in Open Enrollment/correspondence sections, compensation can reach $100,000 or more per year.] These large enrollments are peculiar to the freshman sequence of English and math instruction. Give these workloads, the Team explored adherence to the ACA regulations and Fair Labor laws relative to available benefits. The institution's Director of HR confirmed that the institution is currently in compliance with this regulation due to extended federal deadlines but a solution is needed by January 2017 to maintain that compliance. THE HR Director further stated that determining full-time and part-time equivalencies for Extended Studies adjunct faculty at Adams State University is complicated because Extended Studies faculty are compensated on a per student basis, whereas campus faculty workloads are calculated based on credit hours taught.

Given this information, the Team attempted to contrast full-time and adjunct on-campus vs. Extended Studies adjunct teaching workloads. A regular FT campus-based faculty teaching load is 12 cr. hrs. for the fall and spring semesters. Review of Fall 2015 courses listed in the Banner enrollment system showed enrollment caps of 24 students in all lower level English courses and caps of 36 for Math 104 and 42 for Math 106. Thus, full-time on-campus English faculty could teach approximately 192 students per year, and math faculty could teach a maximum of either 288 (Math 104) or 336 (Math106) students per year in these

lower level courses. These numbers contrast sharply with the much larger volumes seen in Extended Studies open enrollment sections.

The Team interviewed Extended Studies adjunct faculty asking how they manage the workload associated with such large course enrollments. The majority responded that they were able to handle the volume of work because teaching for Extended Studies at ASU is their "full-time job" and that all students are simply not active at all times. (Approximately 10% of the enrolled students never become active in the course.) The Team acknowledges that the institution is aware of the issue and is working to meet the January 2017 deadline. This matter is a high priority for the institution and the Human Resources office has sought the advice and insight of a benefits consultant as this matter is explored in depth. This issue needs to stay at the forefront of the institution's HR work allowing the university to establish fair and ethical policies for benefit eligibility related to workload and compensation.

- **Evidence that demonstrates that further organizational attention and Commission follow-up are required.**

The Team believes that ASU may be in violation of the US Department of Education's section 600.2 of the Electronic Code of Federal Regulations.

USDOE regulation 600.2 specifically addresses the distinction between "correspondence courses" and courses classified as "distance education" and has implications for both Title IV disbursement and transfer/application of credits toward degree attainment. For online courses to be classified as distance education courses---known as semester-based online (OSB) courses at ASU---this USDOE regulation requires "regular and substantive interaction between the students and the instructor." The Team's remote reviews of online semester-based (OSB) courses, comments by instructors during the site visit, and observations noted by ASU course reviewers on quality control documents indicate that several OSB courses rely on only one discussion post to meet this requirement, while some OSB courses have no visible interaction between the instructor and students. This is concerning, as previous audits from the USDOE to higher education institutions have set the precedent that the incorporation of one discussion post into an online course does not constitute substantive interaction, and little or no interaction within an online course firmly aligns that course with the federal definition of a correspondence course which reads, "Interaction between the instructor and student is limited, is not regular and substantive, and is primarily initiated by the student." Furthermore, the issue is compounded by the tuition differential that exists between semester-based and correspondence courses at ASU. The Team notes that the institution charges a total of $1064.40 for a (3) credit semester-based online course and substantially less---$600---for the same course taught as a correspondence course. When asked about the tuition difference, administrators responded that the different rates relate to the difference in the amount of instruction, i.e., interaction provided within the two courses and also as an offset to the limits placed on Title IV funds available for correspondence courses. Thus, administrators are aware of the expected varying levels of instruction and funding associated with these two course classifications, yet several courses do not appear to be in alignment with federal classifications.

Review of online courses and quality assurance documents revealed that many online courses do not reflect the University's Hybrid and Online Course Credit Hour Assignment for Undergraduate Courses policy 100-05-12 which was last reviewed in March, 2015. Specifically, this ASU credit hour policy states that "online courses" are semester based, while "electronic correspondence courses" allow students to work independently in a self-paced format with a one-year completion deadline. The policy states, "…instructor-to-student and student-to-student interaction are an important characteristic of online and hybrid courses. This is, partly, what distinguishes them from electronic correspondence courses." Given the descriptions found within the current policy and based on the federal definition of distance and correspondence courses, the Team asserts that several of the currently classified semester-based online (OSB) courses could be reclassified as correspondence courses due to the lack of interaction or set due dates for coursework.

Team reviews of over 60 Extended Studies courses found that some OSB courses had no set due dates for assignments and allowed or encouraged students to treat the semester-based courses as self-paced courses. This finding was substantiated by instructors and students during on-site interviews, and Team members found instructor comments to this effect within the reviewed courses including but not limited to the quote below in which an instructor explicitly states the self-paced nature of the semester-based course in the syllabus: "Essentially, though, this is a self-paced course which you may complete in as few as six weeks from your date of registration."

Coupled with the above observations, the Team noted no visible student-instructor interaction in numerous semester-based courses. This finding calls the classification of these courses into question in relation to the ASU and federal policy definitions. Similarly, the lack of any noticeable instructional or interactional differences between several courses taught both as OE and OSB courses suggests that instructors are likely using the same instructional methods and materials for both courses with no discernable modifications evident that allow for interaction in the semester-based course sections.

Again, given that this federal regulation impacts the integrity of both Title IV disbursement and transfer/application of credits toward degree attainment, it is of the upmost importance that this issue receive aggressive institutional attention. Similarly, ensuring the institution is accurately charging for its academic offerings is also critical to the integrity of the university. Attention to the classification of Extended Studies courses is imperative since the university must be able to ensure the integrity of its financial and academic responsibilities as they relate to the appropriate classification of online courses.

- **Evidence is insufficient and demonstrates that Commission sanction is warranted.**

 C-1. Team Determination on Criterion Two, Core Component 2.A:

    ___Core Component is met
    ___Core Component is met with concerns
    <u>X</u> Core Component is not met

Summary Statement on Criterion Two, Core Component 2.A:

ASU has implemented numerous policies and procedures geared toward the demonstration and maintenance of the integrity of its Extended Studies offerings. Specifically, changes related to financial, academic, and organizational matters have been addressed and Extended Studies operations have become more integrated into the everyday academic workings of the institution. As indicated in the WCET report, Extended Studies at ASU "…is not a stand-alone program and is well integrated into the fabric of the academic units."

While the institution is incorporating a multitude of changes, subsequent to a comprehensive internal review and recommendations from two external reviews, there are some areas where specific attention is needed in the coming year. ASU must remain diligent in addressing compliance issues regarding the Affordable Care Act and Fair Labor laws to ensure that the institution meets the necessary compliance by the January, 2017 deadline.

Additionally, to remain eligible for Title IV disbursements the university must review online coursework confirming that it complies with federal regulations regarding the classification of correspondence and distance education courses.

A-2. Criterion Two. Integrity: Ethical and Responsible Conduct. Core Component 2.B:
The institution presents itself clearly and completely to its students and to the public with regard to its programs, requirements, faculty and staff, costs to students, control, and accreditation relationships.

B-2. Statements of Evidence

- **Evidence that demonstrates adequate progress in the area of focus.**

  The Team notes that ASU has been working diligently to update and streamline information distributed via their website. As noted in the Extended Studies Action Plan, many web pages on the ASU site have been recently updated or created to increase transparency and improve communications. Though a few discrepancies/broken links were noted, on the whole the institution does present itself clearly and completely to students and the public through its web presence.

  Both undergraduate and graduate academic program information including specific program offerings, degree requirements, faculty contact information and qualifications, and tuition costs can be easily accessed via links on the ASU "Academics" website. Links to tuition/fee schedules and an undergraduate cost estimator appear on the Cost/Tuition page. For distance students, the aforementioned information is found under the Distance Learning menu tab on the primary landing page for the university. Courses and programs that are offered at a distance can be easily accessed by clicking on the Graduate or Undergraduate Distance Degrees and Courses link, which leads to a page where students can then explore courses and programs including specific degree requirements. Tuition costs are provided in the description of the course, and in

instances where the course is offered as open enrollment, print-based, and semester based, the different tuition costs are provided for each delivery option.

For those individuals who do not have access to the internet or cannot explore ASU's website, (e.g., the prison-based population and others without regular internet access) or are considering print-based correspondence courses, printed materials including Print-Based Study Guides and the ASU Extended Studies Prison College Program Catalog are readily available and have been recently updated.

Because of some external scrutiny surrounding the transfer of ASU credits, the Team specifically reviewed information presented to students and the public in this area. The Team found information regarding the transfer of credits both to and from ASU to be easily accessible, understandable, and forthcoming on the "Transfer to Adams State!" web page and the "Transferring Credit from Adams State University" page. Specific information and links to the state website on Colorado's Guaranteed Transfer programs (gtPathways) and Guided Degree Pathways was also readily available. Additionally, the Team reviewed a script detailing transfer policies and responsibilities that is provided to prospective students considering online courses at ASU for transfer and also to all non-degree seeking online students during the registration process.

Accreditation affiliation is displayed on the *About ASU* web page with a link to an ASU Higher Learning Commission Re-accreditation website that displays the HLC mark. This page links to both a brief overview of the re-accreditation process and a more in-depth description of the process via narrative and links to the HLC website. Official accreditation documents, committees involved in the re-accreditation process and numerous additional HLC accreditation resources are linked from this page. Regarding program level accreditation, only the RN to BSN program provided this information directly from the distance learning program site; accreditation information is provided for all business programs when the "Business" link is accessed via the university's main web site.

- **Evidence that demonstrates that further organizational attention is required in the area of focus.**

- **Evidence that demonstrates that further organizational attention and Commission follow-up are required.**

- **Evidence is insufficient and demonstrates that Commission sanction is warranted.**

C-2. Team Determination on Criterion Two, Core Component 2.B:

    <u>X</u> Core Component is met
    __ Core Component is met with concerns
    __ Core Component is not met

Summary Statement on Criterion Two, Core Component 2.B:

The Team found that institutional information was readily accessible and understandable. Institutional literature along with online information gave specifics on program requirements, expectations and costs. Both the college's institutional and programmatic accreditation information is available to consumers along with appropriate policy statements and institutional forms to further inform the student/consumer. The university's recent efforts in updating policy and public information contribute to improved public understanding of university information and expectations.

A-3.Criterion Two, Core Component 2.E: The institution's policies and procedures call for responsible acquisition, discovery, and application of knowledge by its faculty, staff, and students.

Subcomponent 1. The institution provides effective oversight and support services to ensure the integrity of research and scholarly practice conducted by its faculty, staff, and students.

Subcomponent 2. Students are offered guidance in the ethical use of information resources.

Subcomponent 3. The institution has and enforces policies on academic honesty and integrity.

B-3. Statements of Evidence

● **Evidence that demonstrates adequate progress in the area of focus.**

Subcomponent 1: The institution provides effective oversight and support services to ensure the integrity of research and scholarly practice conducted by its faculty, staff, and students.

ASU employs reasonable and appropriate oversight and support services for research and scholarly endeavors undertaken by its faculty, staff, and students. Oversight is managed via an Institutional Review Board (IRB) with all necessary forms and guidelines readily accessible via the IRB web page. Rules and expectations concerning appropriate scholarly behaviors are located in both the Student and Faculty Handbooks under the Code of Conduct and Standards of Professional Conduct and Scholarly Activity sections, and distance students can also find a similar Code of Conduct statement in the Extended Studies Policies guide. Support services that facilitate responsible scholarly conduct include traditional library resources and personnel at the Nielsen Library who assist faculty and students. Distance students are provided research support via links to the Library that include direct access to licensed databases; instructions and contact information for receiving help in accessing the library from off-campus; and tutorials on how to search databases, request resources, and appropriately write and cite using citation guides. Students and faculty are also reminded of copyright

regulations every time they sign in to Blackboard by a disclaimer that is posted on the sign-in page. Faculty are also provided additional support from the AITC which offers guides and resources to faculty on copyright policies, including the legal application of the TEACH Act, on their Policies and Procedures web page. Lastly, Module 13 within the TEED 598 course taken by all online faculty addresses responsible research and scholarly practice, including the avoidance of copyright infringement and promotion of academic integrity.

Subcomponent 2: Students are offered guidance in the ethical use of information resources.

Through the ASU *Ask a Librarian* service distance students are given specific contact for research help. Research guides that are specific to online courses are posted and accessible on the library resources website and sorted by assignment guides, course guides, and subject guides. The Library hosts a page dedicated to avoiding plagiarism and another to understanding and adhering to copyright rules and regulations.

In addition to the information provided in the student Code of Conduct outlining appropriate and ethical research behaviors, distance students at ASU are provided several resources to help inform and support them in the ethical use of information. As with on-campus students, learners taking online courses have direct electronic access to a librarian via the *Ask a Librarian* service in addition to resources found on the Nielsen Library "Writing and Citing" web page which includes links to resources that help students use citation guides, understand copyright, and avoid plagiarism. Moreover, distance students are given specific contact information for a staff member who can provide targeted research assistance to students who cannot come to campus. Lastly, students obtain support from research guides that are specific to online courses and are posted and accessible on the library resources website. These guides offer course and even assignment-specific support, and are easy to navigate.

Subcomponent 3: The institution has and enforces policies on academic honesty and integrity.

ASU has adopted and revised an institutional Academic Integrity and Academic Dishonesty policy (100-03-01); this policy is listed in the Student Handbook and practicing academic honesty is listed as the first item in the Code of Conduct in the Student Handbook. Links to the academic integrity policy appear repeatedly throughout web material.

ASU has gone to great lengths to update and communicate its academic integrity policy. At the time of the site visit the ASU Cabinet and Office of Academic Affairs was collecting feedback on a revised integrity policy and planning for a second reading in which action could be taken to approve the update. When passed, (assumed by all notwithstanding potential edits) Extended Studies personnel, the Academic Council, Graduate Council, and the Curriculum Review Committee plan to focus on creating a campus-wide initiative to demonstrate commitment and encourage adherence to the new policy. In the meantime, the current institutional Academic Integrity (100-03-02) and

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Academic Dishonesty policies (100-03-01) have been made more visible through the creation of the "Academic Integrity at Adams State University" web page which went live in July, 2015. Definitions and descriptions of what constitutes violations, and repercussions of violations of academic integrity are provided on this new page as well as links to the policies themselves including the "President's Statement on Academic Integrity" page in which ASU's President stresses the importance of academic integrity to the institution. In addition to these websites, the Academic Integrity policy can be found in numerous publications and locations such as the ASU General Catalog, Student Handbook, Faculty Handbook, print-based study guide, online course template, and within the institutional syllabus template that is required for use within all ASU courses

- **Evidence that demonstrates that further organizational attention is required in the area of focus.**

Subcomponent 3

In efforts to ensure the academic integrity of online courses in relation to quality as well as honesty, ASU has incorporated an online course quality review process that is coordinated and performed by the AITC staff and the Director of Academic Quality Assurance. The Adams State Online Course Quality Assurance Form, which is based on best practices in online learning, is used during this process to assess the adequacy of a quality instructional environment which promotes academic honesty. In addition, the institution has adopted as policy a set of standardized common course design elements (templates). These standardized elements include the overt presentation of academic policies and procedures (i.e., academic integrity policy, Extended Studies policies, proctoring guidelines, etc.,), and the listing of easily accessible links to essential student resources supporting these policies e.g., online proctoring directions and technology support.

Team members found that while these standardized practices were evidenced within the majority of the OSB and OE courses they reviewed, over 25% of the reviewed courses deviated substantially from the adopted standards and a few were reviewed that ignored the standard elements altogether. Additionally, course review documentation provided by the institution indicated that of the 114 semester-based online courses reviewed during 2015, 93 (81%) did not use the required standard syllabus template, contained broken links to critical student information and resources that would be provided if the standard template was utilized, e.g., academic integrity policy, technical support, ADA policy, student handbook, etc., or was missing key instructional elements required within the Online Course Quality Assurance Form, i.e. proctoring information, instructor information, instructions for students with disabilities, etc. The Team acknowledges that the course reviews performed by AITC were meticulous and the majority of courses violated only a few of the aforementioned policy elements. However, a handful of courses were egregiously out of compliance, and the sheer number of documented non-compliant courses evidences a pervasive lack of policy communication, understanding, or enforcement.

The Team recognizes that some standardization and policy adoption has occurred within the past year, allowing little time for implementation. However, when adherence to course quality policies aimed at improving academic integrity was explored during on-site interviews, Extended Studies and instructional technology personnel, i.e. those responsible for overseeing and performing course reviews and incorporating these adopted practices, indicated that they can only recommend change/implementation of the policies not enforce compliance with policy even when courses were blatantly out of compliance. Department Chairs who are also tasked with academic oversight of policy implementation also acknowledged that there is a struggle between adherence to policy and expressions of academic freedom among faculty.

While new policies and procedures provide evidence that the institution is working to safeguard the integrity of online academic offerings by promoting academic quality and honesty, there appears to be a gap between the adoption and actual implementation of these quality assurance policies and practices. Given the intense scrutiny the institution has come under regarding this specific issue, the Team recommends that the institution give this area additional organizational attention and devise a method by which all non-compliant online courses will be moved into compliance regarding the implementation of ASU quality assurance and academic integrity policies.

- **Evidence that demonstrates that further organizational attention and Commission follow-up are required.**

The Team also identified a similar yet more specific concern related to departmental policies. To attend to concerns over cheating allegations regarding lower-level online math and English courses at ASU, the Team independently met with a select group of online instructors and the department heads from both areas. With regard to the academic integrity measures that have been incorporated, the Team found discrepancies in the information provided during these interviews with information encountered when examining select online courses. More specifically, during the on-site visit both the instructors and department chairs clearly and consistently indicated that the departments had adopted minimum standards regarding the number of proctored assessments required within math and English courses. They indicated this was done to protect academic integrity within online courses. Per the Department Chairs, each online course is required to have a minimum of two proctored assessments that account for at least 20% of a student's overall grade as of Sept. 15, 2015. However, Team members examined select courses within BlackBoard and found multiple instances where this was not the case in currently active English courses, i.e., courses showing student activity as of Sept. 30, 2015.

The English Department Chair indicated there had been mixed and sporadic use of proctoring in the past but this practice was currently being rectified. Team reviews of online English courses---upper and lower level division OSB and OE courses---confirmed sporadic use to be the case, with none of the courses requiring 2 proctored assessments and at least one requiring no proctoring. The majority of reviewed courses listed 1 proctored assignment consisting of a final exam, and this proctored assignment

accounted for between 5% - 10% of the overall course grade in most instances. Additionally, the Team found numerous instances where the proctored final exam submission consisted of three paragraphs or less of student writing. These findings are inconsistent with the departmental requirement of multiple proctored assessments that would account for at least 20% of an online student's grade. Thus, although departmental policies now exist that mandate the use of 2 proctored assessments accounting for 20% or more of the grade as an academic integrity measure, Team members were not able to find evidence of the implementation of this policy within the reviewed online English courses.

Due to the serious nature of the cheating allegations that have been levied against these specific departments and the lack of current evidence to demonstrate incorporation of the new integrity measures, faculty and Department Chair involvement is needed to effectively demonstrate that the relatively new integrity policies are being implemented.

- **Evidence is insufficient and demonstrates that Commission sanction is warranted.**

C-3. Team Determination on Criterion Two, Core Component 2.E:

__ Core Component is met
X Core Component is met with concerns
__ Core Component is not met

Summary Statement on Criterion Two, Core Component 2.E:

ASU employs adequate oversight and support services for research and scholarly endeavors, and distance students are afforded the resources necessary to help inform and support them in the ethical use of information. Recently, the institution has gone to great lengths to update and communicate its academic integrity policy and ensure the integrity of its academic offerings, including the use of standardized syllabi and online course templates, departmental proctoring requirements, and formal course reviews. While these policies and practices are appropriate and commendable, implementation of the policies and practices has yet to be consistently carried out throughout all Extended Studies course offerings. With quality assurance as a shared responsibility between academic departments and Extended Studies personnel, the university is addressing the management of academic operations more closely. That said, the issues cited above will continue to require diligent institutional attention and action as ASU seeks to fulfill its own stated expectations and policy adherence.

A-4. Assumed Practices within the Criteria for Accreditation, Part B. See Appendix A.

B-4. Statements of Evidence. See Appendix A.

B 1 (a)   ASU policies specifically govern matters of minimum program length. Associate degrees require a minimum of 60 credit hours and baccalaureate degrees require a minimum of 120 credit hours; both requirements conform to common standards in higher education.

B 1 (b) ASU observes the common minimum number of credits in residence for its degree programs; 15 for the associate and 30 for the baccalaureate. This information is available to students in the academic catalogue.

B 1 (c) By policy, students may complete a maximum of 9 credit hours of upper-division credit toward a graduate degree program with special permission from the department chair.

B 1 (d) The ASU catalog identifies the normal credit hour load per semester that a student would carry as 15-17 credit hours. Students may register for as many as 20 credit hours but must have special permission for a load greater than 20 credit hrs.

B 1 (e) As stated in Criterion 2 (a) and (e), the team review of Extended Studies courses found that there is a question of rigor as it relates to the expectations for semester-based online courses vs. online "correspondence" courses. Some distance education courses (OSB) do not regularly or sufficiently engage students raising the issue of their similarity to correspondence courses which are not required to have significant student- faculty exchange. An additional issue of concern is that a significant number of online offerings did not follow college expectations for proctored testing and a minimum course grade value of 20% for a final exam/assessment as specified by the institution.

B 1 (f)   ASU has multiple policies relating to the acceptance of transfer credit into the institution and explaining the transfer of its own credit to "home" institutions for students. Policy statements also specify the process for evaluating credit that is received as transfer credit applicable to degree programs.

B 1 (g)   ASU has a breadth of policies to address the variety of prior learning experiences students may bring to their programs. Individual policies speak to establishing credit through: military experience, ACT/SAT scores, Advanced Placement scores, credit by examination, credit by portfolio and vocational credits. This information is available to students through catalogue and web materials.

B 1 (h)   ASU Policy (100-09-11) specifies the General Education requirements for associate and baccalaureate degree-bound students. The requirements are distributed among 5 liberal arts areas with specific hours designated in each.

B 2 (a)   An audit of faculty files confirmed that ASU observes the higher education conventions for teaching faculty credentials throughout its programs whether face-to-face or online. Faculty are expected to hold the degree either in the field or a closely

related field, or appropriate graduate coursework that would qualify them for their assigned teaching. ASU documents all exceptions or variations on this convention and practice at the point of hiring/teaching assignment.

B 2 (b)   Graduate faculty are required to hold a terminal degree and conduct appropriate scholarship/research to achieve rank.

B 2 (c)   Doctoral faculty are expected to be contributors to the academy of knowledge in higher education research and practice. Extended Studies faculty are not specifically monitored for this feature; academic disciplines/departments manage this expectation.

B 3 (a)   Financial Aid information and advisement is designed to inform students about their choices from in-state support to federal aid/grant and loan programs. Services and information are comprehensive.

B 3 (b) The Adams State University Records Office provides appropriate services to students seeking records information and transcripts. Grades are posted timely and transcript requests are secured through the National Student Clearinghouse transcript request website.

C-4. Team Determination on Assumed Practices, Part B.

The University meets Assumed Practices Part B.

The Team notes that Assumed Practices B 1.(e) is <u>met with concerns</u> and requires attention as cited in Criterion 2 a and 2 e Evidence Statements in the Advisory Report. Attention to the quality of student-faculty engagement in OSB courses and the requirements for at least 2 proctored exams and grading approach must be reviewed.

A-5. Assignment of Credit Hours, Program Length, and Tuition (HLC Policy FDCR.A.10.020). An institution shall be able to equate its learning experiences with semester or quarter credit hours using practices common to institutions of higher (e) is Met with Concerns.education, to justify the lengths of its programs in comparison to similar programs found in accredited institutions of higher education, and to justify any program-specific tuition in terms of program costs, program length, and program objectives. Affiliated institutions shall notify the Commission of any significant changes in the relationships among credits, program length, and tuition.

Assignment of Credit Hours. The institution's assignment and award of credit hours shall conform to commonly accepted practices in higher education. Those institutions seeking, or participating in, Title IV federal financial aid, shall demonstrate that they have policies determining the credit hours awarded to courses and programs in keeping with commonly-accepted practices and with the federal definition of the credit hour, as reproduced herein for reference only, and that institutions also have procedures that

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result in an appropriate awarding of institutional credit in conformity with the policies established by the institution.

B-5. Statements of Evidence

• **Evidence that demonstrates adequate progress in the area of focus.**

The Team determined that Adams State University conforms to the conventions and practices associated with the assignment of credit hours both for courses and degree programs. ASU observes the conventional credit hour assignment as seen in other higher education institutions and adheres to this convention not only as a matter of compliance with federal regulation but also in compliance with the State of Colorado higher education policy via the Colorado Commission of Higher Education (CCHE) and the Colorado Department of Higher Education (CDHE).

Adams State policy (100-09-02) identifies the number of credit hours required to earn a baccalaureate degree and a companion Policy (100-05-12) provides specific institutional guidelines for credit hour assignment of online and hybrid coursework. Reasonably, the university requires online or print-based courses to adopt the same credit hour value as the site-based course.

Initial determination of credit hour value for a new course is made at the department level then reviewed by the Department Chair and the ASU Curriculum Committee for adherence to credit hour/contact hour requirements along with other requirements per Policy (100-08- 01). When a site-based course is offered either online or as print-based, internal processes require confirmation of both credit hours awarded and the learning outcomes stated in the syllabus. Online and print-based courses are reviewed to ensure that course assessments and student work (in volume) are equivalent to a counterpart face-to-face course.

Tuition charges and program length fit the norms seen at other accredited institutions. Consumer information in this area is readily available in both digital and print form.

• **Evidence that demonstrates that further organizational attention is required in the area of focus.**

• **Evidence that demonstrates that further organizational attention and Commission follow-up are required.**

• **Evidence is insufficient and demonstrates that Commission sanction is warranted.**

C-5. Team Determination on Assignment of Credit Hours, Program Length, and Tuition:

X   The institution meets this requirement.

__   The institution does not meet this requirement.

Summary Statement on Assignment of Credit Hours, Program Length, and Tuition

ASU follows expected norms in the assignment of credit hours, program length and tuition costs and follows its own policy in determining credit hour course value. ASU complies with federal expectations as well as state regulations/recommendations put forward by the CCHE. In review of individual courses viz-a-viz credit hour value, whether lecture, lab, online or print-based, the Team found that ASU consistently follows its various curriculum policies. Program length and tuition costs are well within norms.

A-6. Practices for the Verification of Student Identity. (HLC Policy FDCR.A.10.050)
An institution offering distance education or correspondence education, as specified in the federal definitions .shall have processes through which the institution establishes that the student who registers in the distance education or correspondence education courses or programs is the same student who participates in and completes and receives the academic credit.

Institutional Practices. In verifying the identify of students who participate in class or coursework the institution may make use of a variety of methods at the option of the institution, including but not limited to: (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. Such methods must have reasonable and appropriate safeguards to protect student privacy. Institutions must notify students at the time of registration or enrollment of any projected additional student charges associated with the verification of student identity such as separate fees charged by proctoring services, etc.

B-6. Statements of Evidence

• **Evidence that demonstrates adequate progress in the area of focus.**

ASU has worked diligently in the recent past---and most specifically in response to external reviews that it requested---to address and remediate concerns relating to student identification issues suggested as being lax in the December 2014 Chronicle article. At the point of admission/registration, students are referred to an online portal to establish their student account using their ASU student ID number. As the student sets an account with the university, he/she is issued a "token" which allows them to proceed to the site requiring their signature of the ASU Acceptable Use Policy. The student is then allowed to create an account and password. In the event that a password is forgotten and reset is necessary students must start the process over by contacting campus personnel who are authorized to assist. These personnel are limited to the One Stop Service Center on campus or the IT Help Desk For a password reset students must provide answers to multiple prompts regarding their personal information. The university maintains a log of authorized personnel and the details account reset and reviews same

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for frequency and validity. The Team determined that the process in place is substantial and conventional.

IT staff at the university confirmed that as a part of their ongoing review of security of student information/identification they are investigating the use of either/both the use of a "secret" question and a "two-factor authentication" such as texting to a cell phone or sending a separate recovery email. These additional security considerations recognize the importance of the vigilance required in the student identification process. IT is working with Extended Studies to achieve the highest level of reliability in administering a process for secure student identification

Students are specifically informed of additional costs beyond tuition charges that relate to proctoring fees in online instruction. This information is available to students with usual course information at the time of registration.

The Extended Studies registration form requires that students adhere to a Statement of Certification at the time that registration materials are submitted. This document states the consequences for failure to provide current and accurate information. Extended Studies is also investigating a potential requirement of added layers of student verification both at the point of registration and at various stages of course completion. Additionally, updated ASU policies on honesty and integrity are cited throughout the web pages hosting online course information and expected student behavior.

ASU Strategic Planning documentation identifies intended enhancement and enforcement of academic integrity standards as well as objectives to improve and enhance Extended Studies processes.

In February 2015, the university began a review of its online examination/proctoring approach with an interest in confirming integrity and identifying any weaknesses. Proctoring of exams---live or online---was managed at that time by Kriterion Konnect; the university has subsequently moved to Examity. Faculty interviewed affirmed their use of the online proctoring service and cited incidents where cheating was caught and reported to them and students were immediately given a grade of F. Faculty conveyed their interest in this new proctoring service and their expectation that they would use the service regularly. Live proctoring is expected to require the student to present a photo ID before the exam process could begin. English and Math courses are in the process of requiring online or face-to-face testing.

- **Evidence that demonstrates that further organizational attention is required in the area of focus.**

- **Evidence that demonstrates that further organizational attention and Commission follow-up are required.**

- **Evidence is insufficient and demonstrates that Commission sanction is warranted.**

C-6. Team Determination on Verification of Student Identity:

    <u>X</u> The institution meets this requirement.
    __ The institution does not meet this requirement.

Summary Statement on Verification of Student Identity

Recent strengthened processes for student identification assure the Team that the university recognizes the need for enhanced attention on this topic. Over the past 7 months and with insight and recommendations from various sources, the university has addressed concerns related to student identification. The establishment of new policy statements, internal reviews of Extended Studies and IT processes and topics scheduled for additional review during this academic year indicates how seriously ASU is responding to concerns of integrity in this area. The university has taken appropriate steps to improve its management of student identification issues and the Extended Studies Action Plan and institutional Strategic Plan identify topics that will continue to be discussed and considered for improvement.

A-7 Criterion Three. Teaching and Learning: Quality, Resources, and Support
    The institution provides high quality education, wherever and however its offerings are delivered

    Core Component 3.C. The institution has the faculty and staff needed for effective, high-quality programs and student services.

B-7. Statements of Evidence

- **Evidence that demonstrates adequate progress in the area of focus.**

- **Evidence that demonstrates that further organizational attention is required in the area of focus.**

    On reviewing faculty workload in Extended Studies, the Team saw that numerous faculty were teaching a large number of online courses (in some cases >5 per semester). As many as 7 full-time faculty/chairs taught between 5 and 9 semester-based online (OSB) courses (15 – 27 cr. hrs. per person) in the Spring 2015 semester; previous semesters revealed similar numbers. All but one of these individuals was also simultaneously teaching between 1 – 7 open enrollment (OE) courses (3 – 21 credit hours per person). Calculations indicated that in the Spring 2015 semester, each of these 7 full-time faculty members was assigned to teach between 18 and 39 credit hours of online courses. It is unknown if the online courses were in addition to or part of regular teaching loads but the number of teaching credit hours for each of these individuals far exceeds the teaching load ASU documented workload states as acceptable and appropriate for full-time faculty/chairs, i.e., 12 credit hours per semester.

The Spring 2015 OSB course offerings identified above did show low enrollments---in many of the assigned courses the average enrollment was 3 students, which somewhat mitigates the   concern that these faculty had an excessive number of students. However, after ascertaining that most of the courses were distinct and not duplicate sections, the Team was concerned that these faculty had the responsibility to prepare for and teach anywhere from 6 to 10 different just for Extended Studies. These data suggest a possible lack of workload planning or system for course rotation that recognizes student needs and human resource efficiencies. The practice of offering a large number of OSB courses every semester may be the very cause of low enrollments which by itself minimizes opportunities for effective student-student interaction in the academic material.

The institution needs to give additional attention to this area and devise measures to ensure that oversight of scheduled offerings and teaching load are conducted in a manner that promotes the stated ASU values of "excellence in teaching and learning", and the "responsible stewardship" of resources.

- **Evidence that demonstrates that further organizational attention and Commission follow-up are required.**

- **Evidence is insufficient and demonstrates that Commission sanction is warranted.**

C-7. Team Determination on Criterion 3, Core Component C

X Core Component is met
__ Core Component is met with concerns
__ Core Component is not met

Summary Statement on Criterion 3, Core Component C

ASU appropriately takes great pride in its mission fulfillment through the availability of online instruction to a very diverse audience of students. In fulfilling its mission and vision objectives the university is cautioned to look at its system approach to scheduling and course loading for both part-time and full-time faculty. Many online OSB courses with low enrollments suggests a possible inefficiency in the use of institutional resources just as overloaded faculty suggests a compromise of the "excellence in teaching" value that ASU affirms. Though policies are in place to define regular full-time faculty load there is no specified maximum for full-time faculty *overload* teaching. The Team believes that a review of this area as part of the next scheduled Extended Studies "program review" would serve university interests.

Assumed Practices within the Criteria for Accreditation

Worksheet A

Foundational to the Criteria and Core Components is a set of practices shared by institutions of higher education in the United States. Unlike Criteria and Core Components, these Assumed Practices are (1) generally matters to be determined as facts, rather than matters requiring professional judgment and (2) unlikely to vary by institutional mission or context.

The Assumed Practices are organized by four areas: (A) Integrity: Ethical and Responsible Conduct; (B) Teaching and Learning: Quality, Resources, and Support; (C) Teaching and Learning: Evaluation and Improvement; and (D) Resources, Planning, and Institutional Effectiveness. These areas link the Assumed Practices to their respective Criteria.

Institutions seeking candidacy will be required to meet all of the Practices prior to admission to candidacy. Institutions in candidacy that do not maintain these Assumed Practices during the candidacy period may have that status withdrawn. Institutions seeking initial accreditation will be granted that status only when all Assumed Practices and all Criteria for Accreditation are in place at the level expected of accredited institutions. In addition, accredited institutions on Show-Cause will be required to demonstrate that they meet all of the Practices prior to being removed from Show-Cause.

A. Integrity: Ethical and Responsible Conduct	Met	Not Met[1]
1. The institution has a conflict of interest policy that ensures that the governing board and the senior administrative personnel act in the best interest of the institution.		
2. The institution has ethics policies for faculty and staff regarding conflict of interest, nepotism, recruitment and admissions, financial aid, privacy of personal information, and contracting.		
3. The institution provides its students, administrators, faculty, and staff with policies and procedures informing them of their rights and responsibilities within the institution.		
4. The institution provides clear information regarding its procedures for receiving complaints and grievances from students and other constituencies, responds to them in a timely manner, and analyzes them to improve its processes.		
5. The institution makes readily available to students and to the general public clear and complete information including:		

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[1] **Documenting the Unmet Assumed Practices**
In addition to documenting the specific reason the Assumed Practice is not met on this form, the team should also reference any unmet Assumed Practice in the appropriate area of the main team report; i.e., the related eligibility requirement, Federal Compliance requirement, or Core Component(s).

a. statements of mission, vision, and values		
b. full descriptions of the requirements for its programs, including all pre-requisite courses		
c. requirements for admission both to the institution and to particular programs or majors		
d. policies on acceptance of transfer credit, including how credit is applied to degree requirements. (Except for courses articulated through transfer policies or institutional agreements, the institution makes no promises to prospective students regarding the acceptance of credit awarded by examination, credit for prior learning, or credit for transfer until an evaluation has been conducted.)		
e. all student costs, including tuition, fees, training, and incidentals; its financial aid policies, practices, and requirements; and its policy on refund		
f. policies regarding academic good standing, probation, and dismissal; residency or enrollment requirements (if any)		
g. a full list of its instructors and their academic credentials		
h. its relationship with any parent organization (corporation, hospital, church, or other entity that owns the institution) and any external providers of its instruction.		
6. The institution assures that all data it makes public are accurate and complete, including those reporting on student achievement of learning and student persistence, retention, and completion.		
7. The institution portrays clearly and accurately to the public its current status with the Higher Learning Commission and with specialized, national, and professional accreditation agencies.		
a. An institution offering programs that require specialized accreditation or recognition in order for its students to be certified or to sit for licensing examinations either has the appropriate accreditation or discloses publicly and clearly the consequences to the students of the lack thereof. The institution makes clear to students the distinction between regional and specialized or program accreditation and the relationships between licensure and the various types of accreditation.		
b. An institution offering programs eligible for specialized accreditation at multiple locations discloses the accreditation status of the program at each location.		
c. An institution that advertises a program as preparation for a licensure examination publicly discloses its licensure pass rate on that examination, unless such information is not available to the institution.		

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8. The governing board and its executive committee, if it has one, include some "public" members. Public members have no significant administrative position or any ownership interest in any of the following: the institution itself; a company that does substantial business with the institution; a company or organization with which the institution has a substantial partnership; a parent, ultimate parent, affiliate, or subsidiary corporation; an investment group or firm substantially involved with one of the above organizations. All publicly-elected members or members appointed by publicly-elected individuals or bodies (governors, elected legislative bodies) are public members. * *Institutions operating under federal control and authorized by Congress are exempt from these requirements. These institutions must have a public board that includes representation by individuals who do not have a current or previous employment or other relationship with the federal government or any military entity. This public board has a significant role in setting policy, reviewing the institution's finances, reviewing and approving major institutional priorities, and overseeing the academic programs of the institution.*		
9. The governing board has the authority to approve the annual budget and to engage and dismiss the chief executive officer.* *Institutions operating under federal control and authorized by Congress are exempt from these requirements. These institutions must have a public board that includes representation by individuals who do not have a current or previous employment or other relationship with the federal government or any military entity. This public board has a significant role in setting policy, reviewing the institution's finances, reviewing and approving major institutional priorities, and overseeing the academic programs of the institution.*		
10. The institution documents outsourcing of all services in written agreements, including agreements with parent or affiliated organizations.		
11. The institution takes responsibility for the ethical and responsible behavior of its contractual partners in relation to actions taken on its behalf.		

`Rationale for Assumed Practices indicated as unmet:`

	Met	Not Met[1]
B. Teaching and Learning: Quality, Resources, and Support		

[1] **Documenting the Unmet Assumed Practices**

In addition to documenting the specific reason the Assumed Practice is not met on this form, the team should also reference any unmet Assumed Practice in the appropriate area of the main team report; i.e., the related eligibility requirement, Federal Compliance requirement, or Core Component(s).

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1. Programs, Courses, and Credits		
a. The institution conforms to commonly accept minimum program length: 60 semester credits for associate's degrees, 120 semester credits for bachelor's degrees, and 30 semester credits beyond the bachelor's for master's degrees. Any variation from these minima must be explained and justified.		
b. The institution requires that 30 of the last 60 credits earned for a bachelor's degree that the institution awards and 15 of the final 30 for an associate's degree it awards be credits earned at the institution.* Institutions that do not maintain such a requirement, or have programs that do not, are able to demonstrate structures or practices that ensure coherence and quality to the degree. (Consortial arrangements are considered to be such structures. In addition, an institution that complies with the criteria for academic residency requirements of the Service members Opportunity Colleges (SOC) will not be deemed out of conformity with this Assumed Practice provided that its policy is an exception for active-duty service members and not for students in general.) *For example, for a bachelor's degree requiring 120 credits, the institution accepts no more than 90 credits in total through transfer or other assessment of prior learning, and the remaining 30 must fall within the last 60 credits awarded the student.*	X	
c. The institution's policy and practice assure that at least 50% of courses applied to a graduate program are courses designed for graduate work, rather than undergraduate courses credited toward a graduate degree. (An institution may allow well-prepared advanced students to substitute its graduate courses for required or elective courses in an undergraduate degree program and then subsequently count those same courses as fulfilling graduate requirements in a related graduate program that the institution offers. In "4+1" or "2+3" programs, at least 50% of the credits allocated for the master's degree – usually 15 of 30 – must be for courses designed for graduate work.)		
d. The institution adheres to policies on student academic load per term that reflect reasonable expectations for successful learning and course completion.		
e. Courses that carry academic credit toward college-level credentials have content and rigor appropriate to higher education.		
f. The institution has a process for ensuring that all courses transferred and applied toward degree requirements demonstrate equivalence with its own courses required for that degree or are of equivalent rigor.		

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g.	The institution has a clear policy on the maximum allowable credit for prior learning as a reasonable proportion of the credits required to complete the student's program. Credit awarded for prior learning is documented, evaluated, and appropriate for the level of degree awarded. (Note that this requirement does not apply to courses transferred from other institutions.)		
h.	The institution maintains a minimum requirement for general education for all of its undergraduate programs whether through a traditional practice of distributed curricula (15 semester credits for AAS degrees, 24 for AS or AA degrees, and 30 for bachelor's degrees) or through integrated, embedded, interdisciplinary, or other accepted models that demonstrate a minimum requirement equivalent to the distributed model. Any variation is explained and justified.		
2. Faculty Roles and Qualifications			
a.	Instructors (excluding for this requirement teaching assistants enrolled in a graduate program and supervised by faculty) possess an academic degree relevant to what they are teaching and at least one level above the level at which they teach, except in programs for terminal degrees or when equivalent experience is established. In terminal degree programs, faculty members possess the same level of degree. When faculty members are employed based on equivalent experience, the institution defines a minimum threshold of experience and an evaluation process that is used in the appointment process.	X	
b.	Instructors teaching at the doctoral level have a record of recognized scholarship, creative endeavor, or achievement in practice commensurate with doctoral expectations.	X	
c.	Faculty participate substantially in:	X	
	1) oversight of the curriculum—its development and implementation, academic substance, currency, and relevance for internal and external constituencies;		
	2) assurance of consistency in the level and quality of instruction and in the expectations of student performance;		
	3) establishment of the academic qualifications for instructional personnel;		
	4) analysis of data and appropriate action of assessment of student learning and program completion.		
3. Support Services			
a.	Financial aid advising clearly and comprehensively reviews students' eligibility for financial assistance and assists students in a full understanding of their debt and its consequences.	X	
b.	The institution maintains timely and accurate transcript and records services.	X	

`Rationale for Assumed Practices indicated as unmet:`

C. Teaching and Learning: Evaluation and Improvement	`Met`	`Not Met`[1]
1. Instructors (excluding for this requirement teaching assistants enrolled in a graduate program and supervised by faculty) have the authority for the assignment of grades. (This requirement allows for collective responsibility, as when a faculty committee has the authority to override a grade on appeal.)		
2. The institution refrains from the transcription of credit from other institutions or providers that it will not apply to its own programs.		
3. The institution has formal and current written agreements for managing any internships and clinical placements included in its programs.		
4. A predominantly or solely single-purpose institution in fields that require licensure for practice is also accredited by or is actively in the process of applying to a recognized specialized accrediting agency for each field, if such agency exists.		
5. Instructors communicate course requirements to students through syllabi.		
6. Institutional data on assessment of student learning are accurate and address the full range of students who enroll.		
7. Institutional data on student retention, persistence, and completion are accurate and address the full range of students who enroll.		

`Rationale for Assumed Practices indicated as unmet:`

D. Resources, Planning, and Institutional Effectiveness	`Met`	`Not Met`[2]

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[1] **Documenting the Unmet Assumed Practices**

In addition to documenting the specific reason the Assumed Practice is not met on this form, the team should also reference any unmet Assumed Practice in the appropriate area of the main team report; i.e., the related eligibility requirement, Federal Compliance requirement, or Core Component(s).

[2] **Documenting the Unmet Assumed Practices**

In addition to documenting the specific reason the Assumed Practice is not met on this form, the team should also reference any unmet Assumed Practice in the appropriate area of the main team report; i.e., the related eligibility requirement, Federal Compliance requirement, or Core Component(s).

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1. The institution is able to meet its current financial obligations.		
2. The institution has a prepared budget for the current year and the capacity to compare it with budgets and actual results of previous years.		
3. The institution has future financial projections addressing its long-term financial sustainability.		
4. The institution maintains effective systems for collecting, analyzing, and using institutional information.		
5. The institution undergoes an external audit by a certified public accountant or a public audit agency of its own financial and educational activities and maintains audited financial statements. For private institutions the audit is annual; for public institutions it is at least every two years.* *Institutions under federal control are exempted provided that they have other reliable information to document the institution's fiscal resources and management.*		
6. The institution's administrative structure includes a chief executive officer, chief financial officer, and chief academic officer (titles may vary) with appropriate credentials and experience and sufficient focus on the institution to ensure appropriate leadership and oversight.		

`Rationale for Assumed Practices indicated as unmet:`

Team Determination: *(Insert one of the following statements.)*

The team has reviewed all Assumed Practices within the Criteria for Accreditation and the institution meets all expectations.

The team has reviewed all Assumed Practices with the Criteria for Accreditation and has determined that the institution does not meet the Assumed Practice(s) (listed below):

Team Recommendation Related to the Assumed Practices:
(If the institution does not meet every Assumed Practice, the institution cannot be granted Candidacy or Initial Accreditation. If the institution is currently in Candidacy and fails to meet one or more Assumed Practices, then the team may determine if the Candidacy should be terminated or another course of action The Team finds that ASU does indeed meet the expectations of the Assumed Practices and notes that B 1.)

The Team finds that ASU does meet the expectations of the Assumed Practices, Section B noting that B 1 (e) is met with concerns and requires attention as cited in Criterion 2 a and 2 e Evidence Statements in the Advisory

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Published: January 2014
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Report. Attention to the quality of student-faculty engagement in OSB courses and the requirements for at least 2 proctored exams and grading approach must be reviewed.