



05/24/16

Members of the Board of Trustees for the Higher Learning Commission:

As you know Adams State University was placed on probation at your February 25, 2016 meeting. After conferring with the Director of the Colorado Department of Higher Education (CDHE), Lt. Governor Joe Garcia and his team, we believe that this sanction is an excessive reaction to the relevant facts. We respectfully request that the sanction be reduced to 'Notice' and that the scheduled April 2017 comprehensive visit be reinstated as a Reaffirmation visit. The rationale for this request follows.

In January 2015 after a series of articles appeared in *The Chronicle of Higher Education*, HLC mandated Special Monitoring requiring a response report from Adams State, and an Advisory visit to address “the specific Core Components, Assumed Practices, and Federal Compliance Requirements ... as they relate to the online and correspondence courses discussed in the article.” Specific items identified in HLC’s [January 2015 letter](#), and addressed by ASU, include: academic integrity, rigor and currency of online and correspondence classes, type and evaluation of students in [these] courses, student identity verification, oversight of proctors and exam monitoring, and credit hour assignment. The [Advisory Team report](#) resulting from the September 2015 Advisory visit did not find any concerns specifically related to these items identified in the January letter.

The sanction of probation instead is based on concerns that had previously not been identified and communicated to ASU, nor was the HLC process transparent.

- Concerns with enrollment numbers and the extent of faculty/student interaction were never identified in the *Chronicle* articles
- The Advisory Team Report was not sent to ASU until after the Public Disclosure Notice (PDN) was issued – 4 months after the Advisory visit; the report was sent then only at the request of ASU.
- The PDN was issued when the sanction of probation was disclosed on February 26, 2016; ASU was notified via email on March 3, 2016, at which time the notification via certified mail had not yet arrived; CDHE and the US Department of Education were also notified without giving the ASU President any time to inform the board, faculty, staff or students.

While the items identified as areas for concern in the team report are valid and were immediately addressed, they do not accurately depict how Adams State University meets the Criteria for Accreditation and over-emphasize a single aspect of the institution’s educational offerings. When all courses and delivery methods are considered one finds that:

- ASU offered 1368 courses in all delivery methods in the fall 2015 semester; the 23 online courses with findings represent 1.7% of all courses. Basing a sanction such as probation on such a small percentage of courses is an overstatement similar to placing a student on academic probation for failing one quiz in a single class.
- The [Advisory Team Report](#) cites “some” and “numerous” instances of inadequate faculty/student interaction; however in reality fewer than 9% of all online courses were reviewed and only “some of those did not meet the requirements.”
- [Grade distribution reports](#) show that students in the online correspondence (open enrollment) courses complete at the same rate as print-based correspondence (70%), and only slightly higher than students in online semester-based courses (66%). Given that students in the correspondence courses have a full year to

complete, this outcome is not surprising. Students in the same Face-to-Face classes complete at a 75% passing rate.

- Concern with enrollment numbers had already been addressed when the Advisory Team visited. The average class size in Fall 2015 was reduced by almost 50% as compared to Fall 2014, which were the numbers cited in the Advisory Team report. The [ASU Response](#) indicated that the average class size was 10.38 for mathematics and 12.54 for English.

A finding of 'Met with Concerns' and a sanction of 'Notice' are far more appropriate when the scope of degrees, course offerings and delivery methods of the entire institution is considered.

ASU believes it meets the Criteria for Accreditation and immediately addressed the areas of concern identified by the Advisory visit team:

- All online semester based courses have been reviewed for adequate faculty/student interaction - 21 online semester based courses were closed prior to classes starting in January 2016 because they did not meet standards for quality and interaction; an additional 26 courses were closed at the end of spring semester because they had not been revised on the required timeline; Closed courses are re-opened only when they have been revised to meet expectation for faculty/student interaction.
- The [Quality Assurance checklist](#) for review and approval of courses has been revised to clearly address the requirement for faculty/student interaction.
- [Academic Council](#) and [Graduate Council](#) have adopted the [Quality Assurance checklist](#) for initial review of all online courses.
- Academic Council and Graduate Council have adopted the [Department Chair Faculty Checklist for Online Courses](#). Department Chairs are reviewing online courses to ensure quality and faculty/student interaction in the spring 2016 semester.
- An [Overload Policy](#) was approved and implemented that restricts the total number of students and credit hours taught by full-time and part-time faculty. Transition will take place over summer 2016 and be fully implemented by fall 2016.
- At the time of the Advisory visit ASU was already in the process of implementing policies to ensure compliance with the Affordable Care Act by the January 2017 deadline. ([Teaching Load Policy](#), [ACA Instructor Credit Hour Assignment](#))

It's crucial that the HLC be aware that the administration overseeing the University and Extended Studies is entirely new; the President and VP for Finance started after June 2015 and the VPAA in July 2016. They have been tightly focused on correcting issues such as those identified by the HLC. The highest priority has been placed on academic integrity, quality and adherence to policies.

The current ASU culture emphasizes access to high quality education and excellence in student learning regardless of delivery method. The University values use of multiple delivery methods to achieve its mission of providing quality education to underserved students. The following actions demonstrate institutional support for this culture shift:

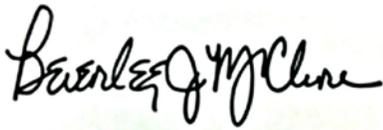
- [Academic Council](#) and [Graduate Council](#) both endorsed the use of the [Quality Assurance checklist](#) developed by Extended Studies for all online courses, including those offered outside of Extended Studies.
- Academic Council members initiated and adopted the [Department Chair Faculty Checklist for Online Courses](#) and implemented it in the spring 2016 semester.
- Academic Council members initiated and developed the [Overload Policy](#) that restricts the enrollment and number of sections taught for all faculty.
- ASU administrators have kept students, faculty, staff and the Board apprised of efforts related to addressing probationary status and the concerns raised by the Advisory visit review team through regular updates and meetings with constituent groups.

The extreme sanction of probation, based solely on deficiencies in a very limited number of course offerings and which have been already been corrected, negatively impacts the access role and mission of an Hispanic Serving Institution such as ASU:

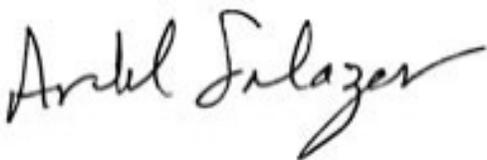
- 95% of ASU students qualify for some kind of Financial Aid; 56% are PELL eligible. Any threat to Federal Financial Aid discourages students from attending college.
- First generation students are unlikely to attend institutions of higher education that are far from their families. For many ASU is the only higher education option. These students are scared by punitive actions such as probation and are thus unlikely to attend college at all, increasing the attainment gap between white and minority students.
- ASU Extended Studies served the institutional mission by supporting 63 undergraduate students through graduation in the Spring 2016 term. Twenty-one of these students were incarcerated students completing print-based correspondence courses. Print-based correspondence courses were not identified with concerns in the Advisory visit team report; however, the negative association of the status of Probation discourages enrollment eliminating access to any other educational options for these students.
- Probationary status has restricted ASU's ability to seek program, location, and contractual approvals through the Substantive Change process which negatively impacts the ability for ASU to fulfill its statutory mission to deliver teacher education programs in rural Colorado and as a regional education provider in the State of Colorado. The institutional value of opportunity and access for all are also compromised.

Given that the sanction of Probation was based on review of 1.7% of all classes, and that the concerns identified by the reviewers have been addressed by the new administration and improvements are under implementation, ASU petitions the HLC board to change the sanction to 'Notice' and reinstate the April 2017 visit as a Reaffirmation visit.

Sincerely,



Dr. Beverlee J. McClure
President



Arnold Salazar
Chair of the Board of Trustees

cc: ASU Board of Trustees
U.S. Senator Michael Bennet
CDHE