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 I 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 corrections 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,

[Signature]

Dr. David P. Svaldi
President