Final Report of Visit to Adams State University by Dr. David J. Mathieu, Consultant, August 8 to August 11, 2016, Evaluating Distance Education Programs

Introduction and Rationale for Campus Visit and Independent Investigation

The visit of the consultant was predicated on the need for an independent investigation and program review of the Office of Extended Studies (OES), an important academic unit of Adams State University (ASU) providing online and in-print correspondence course administration, student recruitment and advising, and quality assurance for ASU’s distance education students.

This investigation and review follows a series of campus events and media coverage of possible questionable policies and practices in the area of distance education at ASU. The sequence of events and rationale for the actions of the Higher Learning Commission (HLC) of the North Central Association, ASU’s regional accreditor, is summarized in their report containing the context and rationale for HLC involvement in reviewing ASU’s distance education offerings and subsequent decision of the HLC to place ASU on probation.

Setting for the Independent Investigation

The consultant was contacted by the Vice President of Academic Affairs (VPAA) in late July, 2016, about the possibility of a visit to review the OES, and more broadly, the campus partners contributing to distance education at ASU. The consultant was known to the VPAA as experienced in academic leadership and online education. The vitae of the consultant is available from ASU.

Arrangements were made for the visit and materials requested by the consultant were reviewed in advance of the visit. These materials were helpful in understanding some aspects of the issues in ASU distance education, but it was clear that an on-site investigation was indeed necessary for deeper and more complete understanding of the issues. Also of great importance were the reports and other documents from the HLC, ASU, and the Colorado Department of Higher Education which were reviewed prior to the on-site visit.

The consultant met initially on-campus with the ASU President, the VPAA, and the Vice President for Administration and Finance to gain their overall perspectives on the investigation, its importance to the institution, and to compile a schedule of needed initial interviews to be conducted and additional documents necessary to support the investigation. Both the range of interviews and requested documents evolved during the visit as additional issues were identified.

Although the majority of the individual and group interviews were conducted alone by the consultant, nearly all were introduced by the VPAA who stressed the intentions of the investigation, the transparency of the investigation, and that the senior administrative officers were entering the investigation with an open mind regarding the leadership of OES, personnel, or practices of OES. These statements accomplished a great deal in opening opportunities for dialogue with staff members of OES and other related University staff during the visit.
It should be noted that two members of the leadership of OES as well as the former VPAA were placed on administrative leave with pay for the week of the visit in order to facilitate dialogue with relevant staff and to remove any possible appearance of undue influence over the independent investigation. This assisted in the conduct of the investigation greatly. The consultant, however, was able to interview the two members of OES leadership during the course of the week. All interviews were conducted in private meeting rooms on campus. It should also be noted that the current President, VPAA, and Vice President for Administration and Finance made it clear to the consultant that they wanted a fair and unbiased findings report completely free of their own influence.

The following individuals and groups, by position at the University, were interviewed by the consultant.

- ASU President
- Vice President for Academic Affairs
- Vice President for Administration and Finance
- Vice President for Student Services
- Associate Vice President (academics) for Extended Studies
- Assistant Vice President (operations) for Extended Studies
- The staff of the Center for Extended Studies (large group)
- Quality Assurance Team for the Office of Extended Studies
- Director of the Academic Instructional Technology Center (AITC) (online technology-related course design and technology support)
- Director of Institutional Research
- Director of Human Resources
- Director of Financial Aid
- University Registrar
- Academic Advisor/Recruiter for the Center for Extended Studies
- Coordinator of Professional Education and Dual (high school) Enrollment for the Office of Extended Studies

The following documents, publications, and reports were reviewed during the investigation.

- ASU Catalog
- ASU Faculty Handbook
- Center for Extended Studies staff positions
- Center for Extended Studies budget request materials and the current operational budget
- Several online course syllabi
- Several examples of ASU student transcripts
- Several examples of ASU student evaluations of faculty in online courses
- Reports of faculty credit loads
- Campus and online faculty total compensation for FY15-16, 14-15, and 13-14 (by individual)
- Differential program tuition and fees schedule
- Human resources employment announcements
- Extended Studies promotional materials
Institutional Research Office-generated reports regarding incomplete grades, course completion, and grade distribution, on-campus and online.

Several online faculty vitae

Findings and Relevant Recommendations

The Office of Extended Studies at Adams State University is a very large and personnel-dependent academic unit. The fundamental responsibilities of OES lie in correspondence and online learning modalities largely duplicating on-campus, face-to-face programs. It appears that the OES was initiated many years ago to manage the flow of print-based correspondence courses to distant students as well as to several prison populations in the central western states. As online technologies developed in higher education and were considered by ASU, OES added this additional modality to the college’s offerings. Thus, the span of control over largely distant instructional modalities grew steadily as departments and the university’s interest expanded and the University’s realization of the OES providing additional revenues drove the development of the current structure and the development of a quasi-independent unit of the University was set in motion. These actions occurred well before the tenure of the current President and VPAA.

It appears that several aspects of the OES’s responsibilities, however, became outmoded or no longer reflecting best practices in a period of greater regulatory and quality-assessed higher education nationwide. As the University attempted to maintain alignment with such changes, the OES became increasingly independent and rooted in older structural and reporting models. This appears to have contributed to a culture of separation from the university. This culture appears to have been maintained largely by the OES’s leadership and the Office of the former VPAA until the HLC Advisory Team began its investigation in late 2015.

The following findings summarize the state of the current OES:

Finding: Organizational Dysfunction

- From this investigation, it appears that OES has become a largely dysfunctional unit and, organizationally, is out of date Vis a Vis the University as a whole. This dysfunctionality is further compromised by OES in its relationship with other offices of the University and what should be mutually dependent access to information and activities.

- It should be noted that the dysfunctionality of the OES lies with its leadership and former university leadership, not with the OES or other office staff who are competently doing the work that has been assigned. The leadership of the OES and the Office of the former VPAA did little to correct what should have been obvious issues and problems that would soon seriously impact the University’s reputation and led to an HLC sanction of probation that threatens the accreditation of the University by the regional accreditor.
Recommendations:

- Close OES as an administrative unit of the University.

- Replace with an Office of Continuing Education with responsibility for customized training opportunities, workforce development, non-credit and credit professional education and development, community development opportunities, and ASU service contributing to the development of the San Luis Valley university service area. Such an Office is existent on virtually all 2-year and many 4-year college campuses. Thus, many models for such efforts exist.

- Reassign a number of existing staff from the OES to the Office of Continuing Education as well as other support offices such as business office, registrar, admissions, etc. as deemed appropriate and cognizant of relevant skills. Such reassignment should appeal widely to OES staff who will see the Office of Continuing Education as in better alignment with their interests and aspirations for the University.

Finding: Open Enrollment

- Open enrollment is the term used to describe student access to enrollment in credit and non-credit courses that do not require adherence to particular academic term start dates. At ASU’s OES, the concept of open enrollment has been applied to credit-bearing, degree program eligible courses in addition to the more common use in non-credit and non-degree credit-bearing courses.

- It is understandable in the history of distance offerings when the only available modality was the use of printed/written for-credit correspondence courses. However, since the introduction of online courses and the regulatory changes to financial aid-relevant fixed-term starts and endings as well as the need to track and report federal Satisfactory Academic Progress criteria has occurred. Additionally, fixed term starts are necessary to report Last Day of Attendance of aid-receiving students in order for the institution to avoid having to pay back distributed federal grant aid awarded to students who did not complete one or more courses where aid has been applied. At ASU, the continued use of Open Enrollment courses has frustrated attempts to remain in compliance with federal financial aid regulations.

- The continued use of Open Enrollment courses has additionally encouraged abuse of academic integrity, student engagement, and the maintenance of academic standards. OES staff and the Registrar frequently noted the ability of students to enroll in an independent study course very close to the end of the semester in order to meet athletic eligibility requirements and other needs. ASU staff reported that ASU’s open enrollment policies have attracted students from other institutions who need the open enrollment access to credit-bearing, degree program eligible courses for similar reasons, but academic policy at their own home institution prevented such abuse. It is clear that the
academic reputation of ASU among peer institutions has been compromised via open enrollment.

Recommendations:

• End the existence of and access to open enrollment, credit-bearing, degree program-eligible courses as soon as possible. The academic integrity and reputation of the University should not be compromised further.

• Caveat: Open Enrollment has appropriate and necessary application in Continuing Education and related non-degree courses such as CEU offerings, certifications, needed professional education opportunities (as in teacher continuing education toward recertification, etc.). Maintenance of open enrollment in these areas is meant to be unaffected by the recommendation regarding credit-bearing, degree program-eligible courses. Additionally, specific open enrollment courses serving the incarcerated population serve the mission of the university and a need that few other institutions are currently filling.

Finding: Lack of Limitations on Faculty Course Loads and Enrollment Caps/Consequent Inequalities in Faculty Compensation

• Until very recently, limitations on faculty course loads did not exist outside of the four course/12 credit basic contract load. Largely through the teaching of online classes via OES, many faculty course loads exceeded the four-course standard by twice or more each semester. Multiple methods for calculating faculty compensation were in place with some faculty being paid by the course and others being paid by student enrollment in the courses. Although this was not done randomly and certain situations dictated the method of compensation, the question of why these differences existed was not clear to this investigator.

• In examining institutional payroll for year-end total compensation over a 4-year period of time, it was found that many members of the faculty and some members of the staff received in excess of $100,000 in total compensation with several individuals in the $150,000 range in total compensation and some faculty members, including adjuncts, even higher. This compares to the average new assistant professor initial academic year (9 months) contract averaging under $50,000. The ability of individual faculty to take advantage of additional compensation activities through OES appears egregious and to have been facilitated by “rolling over” course teaching and other activities to the same individuals year after year within OES as the list of names of faculty at the top of the highest levels of compensation appears to be relatively stable year to year.

• The implementation of course load limits for faculty at institutions nationally was to protect faculty from administrative capriciousness regarding the workload of faculty as well as the consequent impact on the quality of teaching as faculty workload increases beyond the 12-15 credits per academic term. It is not understood how these almost universally-observed standards could have been ignored or authorized by the academic and institutional leadership of OES and Adams State University to permit many faculty to
teach up to double the normal course load each academic term, sometimes in addition to other paid non-teaching duties. These violations of normally accepted protocols predate the current senior administration of the university.

- Evidence of the negative impact of extreme course load to the quality of online teaching was found through random investigator access to “live” and recently completed online courses of faculty with the largest course load and consequent compensation. In the majority of observations, there was virtually no evidence of student engagement by the faculty in terms of student discussions, regular course announcements, assignment feedback, or answering student email. The majority of courses appeared to be virtually self-taught although this was not the intention when the courses were designed and likely did not match the expectations of students given the information they received in OES promotional materials. Some random checks on student evaluations of faculty in this category confirmed these observations in many cases as they noted the lack of access or availability of their instructor. They also often noted the low degree of difficulty in the course.

- The conclusion drawn from these observations is that there was often greater interest in remuneration rather than quality teaching and the maintenance of academic standards among many of the faculty teaching online courses for OES.

Recommendations:

- The recently implemented policy of limiting the number of courses faculty may teach above the normal load should be continued. The University may, however, wish to implement limitations on individual faculty earnings from all campus sources as a percentage above contract in addition to the course limitations.

- Continue the requirement of the TEED (new online faculty orientation course). There is general agreement that it has quality content and is very well taught by the current AITC staff.

Finding: Lack of Quality Control and Monitoring of Faculty Online Teaching

- Quality Assurance, as described by the Associate VP (academic) of the Center for Extended Studies, was primarily accomplished by the Academic Instructional Technology Center prior to the online course going “live” and was confined to the technical capabilities of the course and initial course content approval by the Office of Academic Affairs of the University.

- Monitoring of the actual teaching of online courses is not undertaken by OES staff and is not viewed as their responsibility. It is instead viewed as the responsibility of the relevant academic department chairs. However, until recently, the department chairs had little access to the online courses as they were being taught in order to exercise quality control. The chairs now have access, but no evidence of training on using the online course access
or agreement on what aspects of the teaching to be evaluated were identified in the review. This investigator understands that such training is now being provided to the Academic Council (council of chairs) and began during the fall 2016 semester.

• There is only a small percentage of students who complete course/faculty evaluations in the online courses of the OES. No encouragement of students to complete evaluations was evident in the courses nor via announcements from the OES despite the small numbers of evaluations as well as their importance to the maintenance of quality student experiences. There is also apparent confusion regarding where the evaluations “go” following online submission by the students in terms of what individual or what office actually reviews the evaluations. The evaluations are logged by the staff of the OES, but no further evidence of actual review could be determined. Evidence of the evaluations being made available to the online faculty for their review also could not be determined by this review.

Recommendations:

• Establish clear departmental responsibilities for the monitoring of online faculty teaching via the department chair and/or “lead faculty” responsibilities.

• Initiate broad faculty discussion of the criteria identifying quality online teaching and learning and how these are to be assessed.

• Develop a new curriculum approval process for new courses and new course modalities that relies on departmental rather than individual faculty initiation. Such an approval process would emphasize intra-departmental collaboration/review/approval and responsibility as well as inter-departmental communication/review/approval and coordination. To be clear, this is necessary for both online as well as face-to-face courses and programs.

Finding: Misuse of Incomplete Grades

• The Office of Institutional Effectiveness found that the percentage of Incomplete grades assigned from distance courses offered through the OES was 72.2% of all grades submitted. This compares to < 1.0% during the same period for on-campus, face-to-face classes. The prevalence of Incomplete grades compromises university efforts to assess Satisfactory Academic Progress as Incompletes are considered in the same category as grades of F and U (or equivalent Pass/No Pass designation). Such high numbers of Incompletes also suggest the lack of judicious use of the Incomplete grade and the implied ability of the student to actually turn in assignments to complete the course.

• It was additionally reported that when the teaching faculty failed to enter an Incomplete grade into the grade submission form, staff in the OES were instructed to enter the Incomplete for the instructor. If true, this is a violation of the normal procedure of only faculty-submitted final grades received by the Registrar. This reviewer also could not be
certain of the rationale of submitting course grades via the OES as there appears to be no need to do so.

Recommendations:

- Assume that an Incomplete grade is only permitted when approximately 80%, in the view of the faculty member of record, of course requirements have been completed in the course.

- Students should understand that the assignment of an Incomplete is to be thought of in terms of a request, not a right, to receive the grade.

- Faculty and students should agree in writing to what will be required for the student to complete the course, receive credit, and have a letter grade assigned.

- Incomplete grades (as with all grades) are to be only assigned and entered in grade reports by the faculty-of-record for the course.

- Faculty continuing to assign abnormal numbers of Incomplete grades assigned should be reviewed by the relevant department chair and the VPAA/designee.

Finding: Irregularities in Records Submitted to the Registrar

- A number of irregularities in the recording and transcripting of academic outcomes originating in the OES were reported during the review.

- The University has what is called an Interdisciplinary Studies major which is supervised by the Associate VP (academics) of the OES. Although available to all students, it appears that it is used nearly exclusively by students pursuing their degree from a distance and brings into the university a large number of transfer credits in areas not offered by ASU. The requirements of this degree include 42 credits of elective credit. There is no indication of the upper division credit requirement for the major. The student-proposed degree program is to be “demonstrated” as being academically “coherent”, but the catalog does not explain how this is to be done. The catalog also lists Interdisciplinary Studies as a department with no faculty which would seem to be unusual. The Associate VP Academics is listed as the Chairperson.

- It was reported and documented that Interdisciplinary Studies majors have been officially transcripted with emphasis in areas in which the University has no offerings such as “Interdisciplinary Studies in Construction Management”, “Interdisciplinary Studies in Child Development”, and “Interdisciplinary Studies in Public Safety”. Such notations on the ASU official transcript are misleading, inaccurate, and in violation of institutional integrity as seen by regional accreditors.

- Transcripts were produced that contained no synthesis of academic courses during the same term. Thus, on-campus courses taken during a particular semester are listed as
enrolled in by the student as per usual, but directly underneath are OES courses listed as taken during the same semester. This reviewer has not previously seen such a transcript format.

Recommendation:

• As Academic Records represent certification of student achievement in the view of colleague higher education institutions, policy is required that standardizes transcript format and prevents transcripting of non-standard and non-approved academic program titles in accordance with AACRO standards.

Finding: The Graduate programs of the University appear to be semi-autonomous entities with regard to course approval processes, graduate admissions, and degree authority.

• The ASU Academic Catalog inappropriately states that the Department of History, Anthropology, Philosophy, Political Science, Spanish (HAPPSS) offers a master's degree in humanities. As the HAPPSS Department cannot have degree-granting authority, the catalog is in error. Only the institution has degree-granting authority. (As an aside, it was noted that the name of this department does not include Spanish in the Catalog header, but does include Spanish in the departmental description immediately below on the same page. It appears that there may be a number of errors throughout the catalog.)

• Although several of the contract providers such as the Center for Justice and others appear to be implemented in accordance with best practices in their teaching and use in meeting program requirements, there appear to be anomalies in the graduate offerings.

Recommendations:

• Create the position of Chief Graduate and Research Officer/Office of Graduate Studies and Research.

• This important office would replace the OES with regard to graduate student policies, graduate student admissions review and acceptance, graduate professional development opportunities for in-service teachers and other professions, Institutional Review/Human Subjects Review Board (IRB) administration, advocacy for further development of graduate offerings and accreditations, as well as quality assurance for all graduate programs of the University in collaboration with the relevant home department.
Finding: Incomplete Integration of Administrative Computing Platform (Banner) Among All Administrative Offices of the University with Extended Studies.

- The reluctance of the OES to integrate with the remainder of the ASU administrative offices with the computing platform, Banner, as well as the reluctance of previous University administration to force the integration has created a situation where consistency of information being entered is not uniform and data integrity is compromised.

- The lack of full administrative computing integration compromises the ability of the University to obtain uniform reports regarding financial records, student progress tracking, policy implementation, accounts receivable, and a host of other University operations. The lack of integration also lowers the level of confidence in the required reporting of University operations when OES information is included.

- Staff knowledge of particular areas of Banner processes as well as their place in the structure of administrative computing functions is not well understood. Training in Banner functionality is reportedly not uniform across the campus.

Recommendation:

- Complete integration of administrative computing across campus must be accomplished as soon as possible. All administrative unit staff must receive comparable as well as functionally relevant training in the existing Banner system and additional training as system upgrades are implemented.

Finding: Complete and timely information regarding staff and faculty recruitment, position announcements, and the availability of employment information on the Human Resources/Employment area of the University website appears to be incomplete and inconsistent.

- Review of the Human Resources area of the University website appears to reveal a lack of complete information regarding faculty and staff positions available at the University, particularly regarding adjunct faculty openings.

- Solicitation of candidate information contributing to a perpetually robust pool of available adjunct faculty has apparently not been done in recent memory. Human Resources and the OES reported a dwindling pool of adjunct faculty as a partial explanation for faculty course overloads.
**Recommendations:**

- Through announcements on the employment area of the University website and other media outlets, post continuing solicitations for current and future openings for part-time faculty adjuncts so that a ready pool of candidates can be maintained at all times.

- All position announcements for faculty and staff positions must be listed in a timely manner on the University website in order to ensure proper implementation of affirmative and EEO-compliant hiring practices campus-wide.

**Final Thoughts on the Investigation**

The investigation revealed a great deal of information, practices, and anomalies in the administration of the OES that, together, indicated very serious deficiencies and behaviors that more than verified the findings of the HLC Advisory Team visit in 2015. The egregious, diverse, and arguably unethical nature of many of the findings run counter to HLC criteria for reaffirmation of accreditation to the degree that the accreditor felt it was necessary to move directly to an institutional status of probation. Due to the seriousness of the original findings, particularly in a state higher education institution that is part of a state higher education system, it was apparently felt by HLC that violations warranted a very stern warning. From what was learned in the current investigation, the sanction imposed seems justified.

Although the locus of concern was the OES and its leadership, it is clear that the questionable practices of the OES were directly and indirectly supported by the former senior University administration as well as a variety of organizationally questionable practices of many kinds in other academic areas of the campus. There is, indeed, a culture of questionable academic practice that appears to have been in place for many years; a culture that further compounded the actions of the OES such that, for many, it became standard operating procedure that was rarely questioned.

The recommendations presented in this report are many and most amount to huge tasks that are much easier to suggest than they are to accomplish. This is understood and the size and nature of the tasks is appreciated. The recommendations themselves do not remedy all of the campus issues, but their launch will necessarily bring about changes in these other areas. It is strongly felt that the institutional and service area aspirations of the new executive, academic, and financial administration clearly require attention to the matters listed in the findings. Having met the new senior administration as well as experiencing the sincerity of their supporting staff, the institution is in very capable hands and prepared to bring about rapid positive change to the University, a situation that will also be appreciated by the HLC 2017 site visit team as well as the HLC leadership.