Reviewed for the State of Colorado
Department of Higher Education

Huntington College of Health Sciences
1204 Kenesaw Avenue
Suite D
Knoxville, TN 37919

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Sources of Information

Regulation Determination Questionnaire for Private Colleges and Universities, State of Colorado
Degree Authorization Act, State of Colorado
Initial Authorization Checklist, Huntington College of Health Sciences
Letter from DETC Accrediting Commission, April 2009
Transferability of Credit Disclosure Statement
Ownership of School memo, June 09
E-mail from the Academic Dean, June 09
State of Tennessee graduation and placement data
Correspondence and reports related to DETC accreditation site visit
HCHS catalog

Institutional Summary

Huntington College of Health Sciences (HCHS), founded in 1985, is authorized by the State of Tennessee and is fully accredited by the Distance Education and Training Council (DETC). Accreditation was first awarded by the council in 1989. The college's most recent accreditation was in 2005. Citations were responded to by the institution and deemed satisfactory to the accrediting body.

Under new ownership in 2005, the name of the college was changed from the American Academy of Nutrition to the Huntington College of Health Sciences. Nutrition is the only major offered at the college at this time.

Subject matter experts have approved programs for DETC. The programs of Huntington College of Health Sciences are also recognized by the U.S. Department of Education, CHEA, and the U. S. military.

The college offers the following programs:

- Associate of Science Degree in Nutrition
- Bachelor of Science Degree in Nutrition
- Master of Science Degree in Nutrition
- Diploma programs in:
  - Comprehensive Nutrition Diploma
  - Women's Nutrition Diploma
  - Sports Nutrition Diploma
  - Natural Sciences Diploma
  - Business Management Diploma
  - Dietary Supplement Science Diploma
- Individual Courses
- Certificates in Non-Credit Short Courses offered at the California location are not identified, nor is there an explanation about how these will be treated by the State of Colorado.

1. **Documentation demonstrating familiarity with accreditation and state authorization, policies and procedures**

Huntington College of Health Sciences is authorized by the State of Tennessee and participates in an annual reauthorization process. The college is fully accredited by the Distance Education and Training Council.

The most recent DETC accreditation was conducted in 2005. Proof of accreditation is offered in the form of a letter dated April 20, 2009. It is unclear how often institutions are required to be reauthorized. Two members of the board of governors and the registrar successfully completed the DETC Evaluator Training program in 2005 and 2006, designed to insure that the participants are familiar with all aspects of accreditation.

In correspondence with the institution, Huntington is "actively developing a Doctorate Degree in Nutrition, and other plans include programs in nursing (BSN), MSN for existing RNS), programs in pharmacy (Pharm. D. for existing pharmacists, and pharmacy technician), and Complementary and Integrative Medicine degree programs, as well as degree programs in business and education." The reviewers assume that Huntington is not seeking authorization at this time for these degrees.

Evidence is lacking that the applicant specifically addressed issues related to being prohibited from doing business in another state, or if substantially the same ownership or principal officers have operated as a private college or university that has had its accreditation suspended or withdrawn or has been prohibited from doing business in another state. These issues should be clarified to determine compliance with the statutes of the State of Colorado.

Articles of Incorporation

The college is presently incorporated in the State of Tennessee. Since the college is a 'correspondence school' (a times described as 'distance education in published materials), the location of the administrative services could be in any state. Colorado may have been selected as a state which would be receptive to the programs offered.

2.03.01 No location has been identified and may not occur until Colorado authorization has been granted. The college has not met this requirement.

Consequently, the accrediting body has not conducted a site visit, also required in the statute of the State of Colorado.

Board of Trustees/Governors/Owners

HCHS' Governing Board has four members. Three of those members reside in California. The fourth, who is also the Academic Dean, resides in New York.

The names listed as owners appear to be relatives of the Chairman, President, and Academic Dean.

Except as an ex-officio representative, governing boards do not typically include academic members. However, Arthur M. Presser and Gene Bruno as listed both as members of the faculty and as members of the Governing Board.

Resumes for the board members were not included with the materials.

(Issues related to the fiduciary responsibilities of the Governors are addressed in the section on Finances.)

3.02.02

C.3 The board does not appear to include among its members someone who represents the public interest, as required by the statutes of the State of Colorado. Three of the four members of the Governing Board appear closely related to owners of the HCHS.

Governance structure:

It is unclear whether there is a faculty organization responsible for curriculum development and review. At most distance education institutions which employ faculty members at many locations, opportunities are provided for those in the same departments, or those who teach like courses, to confer about and evaluate course content and materials in a systematic manner. This process is necessary to verify course/programs' effectiveness. The interaction among faculty members necessary to insure course/program effectiveness may be lacking at HCHS.

2. Statement of Mission

The HCHS catalog states: "The mission of the college is to develop accessible, convenient and comprehensive distance education in nutrition and the health sciences…. The integration of conventional health sciences and scientifically sound alternative approaches to the health sciences is one of Huntington's special strengths.

Huntington attains its objectives by maintaining the highest academic standards…. Our faculty is comprised of respected scholars in their field. We use the latest, most comprehensive textbooks, videos and other learning aids."

Inclusion of *health sciences* in both the college name and in the mission is not consistent with the programs offered, all of which (except business management) are in nutrition.

Maintenance of the highest academic standards cannot be verified from the information, as there is no evidence of assessment or evaluation of the programs. Comprehensive lists of faculty scholarship and publications are also missing. Given the academic standards are unclear and HCHS does not state "respected" by whom, such statements may be misleading to the public.

The statement "We use the latest, most comprehensive textbooks, videos and other learning aids" is significant in what it does not include. In today's highly sophisticated higher education environment, it is remarkable that the use of the Internet for

communications and research is not primary to delivering the most up-to-date curriculum.

3. Institutional Organization

The Institutional Organization section lists the names of the Governing Board and members of the faculty. Missing is a typical academic organizational chart, e.g., the dean, departmental organization, student services, administrative staff, etc.

There are 18 faculty names in the application for authorization; 21 are profiled in the catalog. It is unclear which of these numbers is correct.

The sheet on Faculty and Qualifications does not include degree information or the subjects/programs in which the faculty members teach, thereby permitting evaluators to determine whether the faculty members present appropriate credentials.

Regarding the faculty names and credentials listed in the catalog and other published materials, two observations are noteworthy: The credentials of some faculty members may not be from accredited colleges or universities, which brings into question the quality and rigor of their courses and the 'highest standards' aspired to, as stated. In addition, a number of the faculty members have their degrees from HCHS, which suggests they have not adequately tested their knowledge and skills against criteria outside HCHS.

C. 4 Nowhere is there a matrix listing faculty name, degrees, and academic publications and teaching assignments. Therefore, it is impossible to determine that the instruction is delivered by appropriate, qualified faculty.

The auditor's report includes a line for salaries and wages in 2008 at @$73,000. It is unclear how many faculty members actually teach on a regular basis, the amount of salaries paid to them, and how such relatively few individuals (based on these salaries) can provide adequate instruction to 237 students.

4. Degree and Academic Programs

Huntington College Health Science claims to offer the first accredited complete distance education nutrition program. The application did not offer evidence of similar programs in already-accredited institutions.

The institution did report they had submitted "various academic curricula" to three professional associations that offer national board exams and certifications for nutrition professionals. The institution reported, "In each case, the curriculum for the academic program submitted was approved as having met the academic requirements for taking that organizations board exam." Names of the three certification organizations that HCHS is affiliated with are provided in a memo dated July 2, 2009 from the Academic Dean. However, HCHS did not provide any further information, such as letters from these professional associations regarding the approval of the curriculum.

While the organizations may all be quite creditable, upon further investigation, the reviewers found there are reasons for caution in accepting their credentials without further investigation.

For example, the National Association of Nutrition Professionals site promotes the tapes and writings of a member with a doctorate that is from an online institution that does not offer a degree in nutrition. At the site of the American Clinical Board of Nutrition (ACBN), a chiropractor is listed as the president. This individual has a website where he sells his services and dietary products (see http://www.biodefender.net/id2.html). Fifty-one percent of the member of ACBN, according to its by-laws, must be chiropractors, and one has to wonder about their qualifications regarding nutrition.

HCHS offers two undergraduate degrees (Associate and Bachelor), a Master's degree, and six diploma programs. All majors are in nutrition, except for the diploma in Business Management,

The latest enrollment figure of an active headcount is 237, distributed by degree/program:

Associate's Degree	22
Bachelor's Degree	21
Master's Degree	44
Comprehensive Nutrition Diploma	66
Women's Nutrition Diploma	1
Sports Nutrition Diploma	6
Natural Science Diploma	1
Business Management Diploma	0

Dietary Supplement Science Diploma	2
Individual Courses	48
Non-Credit Certificate Short Courses (California Office)**	26

(The appropriateness of a diploma in Small Business Management in these offerings is questionable. It does not clearly relate to the health sciences.)

The above totals include courses offered only from the California office. Presumably, these represent a portion of the college revenue, yet they are not described in authorization materials or in their relationship to the overall college mission. The State of Colorado may have an interest in exploring this separation further.

The catalog describes more than 60 undergraduate and graduate courses. The college catalog briefly describes course requirements for program completion. Textbook titles follow each course description, but it is impossible to determine their appropriateness to the content or their currency. Students who wish to purchase texts on their own must request ordering information from the registrar. Typically, students order their study materials from the college. An estimate of the additional costs is just that, and the actual costs could be higher.

With few exceptions, the only pre-requisite for enrollment in the diploma/associate/bachelor programs is either a high school diploma or the GED.

HCHS states in their application that students received counseling prior to enrollment by enrollment specialists. These specialists and their qualifications are not identified. With the above imbalance in diploma enrollments, there is a question about how much assistance is provided or if, indeed, the array of program offerings is appropriate.

It is unclear whether there are comparable programs which have been authorized in Colorado, other than the American Health Sciences University.

If a college finds that it becomes necessary to close a program, provisions must be made for 'teaching out' students in that program or providing assistance to them in transferring to another institution. DETC reports that Huntington College of Health Sciences has already engaged in teaching out a program for

another institution which closed precipitately, yet the institution does not appear to have made a similar plan for itself.

The college reports, "No student has been dismissed for academic failure." This calls into question the academic standards of the institution, particularly when no additional tutoring is offered.

Evidence regarding student success is confusing. For example, more placements are reported than completions. These statistics are reported for Huntington College of Health Sciences on the Tennessee Commission on Higher Education website (2008) (http://tn.gov/thec/Divisions/LRA/PostsecondaryAuth/segpr.html)

Total Completions/Placements:

	Completions	Placements
Associate degree	10	2
Bachelor's degree	0	3
Comprehensive Nutrition	21	27
Individual Courses	0	3
Master's degree	6	8
Natural Sciences	0	NA
Sports Nutrition	0	NA

C. 7 A coherent statement as to the general education component is not provided. General education course requirements contain fewer credits in the curriculum than that in most approved undergraduate and graduate degree programs. A few problematic issues at the bachelor's level are: ENG 130, Reading Enhancement, Natural Sciences without laboratory experiences (simulated only?); General Education coursework in BUS 140 (Contemporary Marketing), BUS 142 (Managing a Small Business), CDV 144 (Child Development) and MAT101 (Business Math).

At the master's level, students are expected to evaluate results of laboratory tests in assessing nutritional needs. It is difficult to determine from the materials how and when laboratory courses are offered.

The reviewers believe there is a strong probability that an under-informed student could be confused about the relationship between certified degrees in DIETETICS and NUTRITION. The first is highly academic and regulated, often with state licensure requirements for practice as a dietitian.

C.6 These state guidelines require that programs be appropriately named and based on fields of study recognized as appropriate as demonstrated by professional literature in the field, the offering of similar programs and other accredited colleges, and by the existence of professional organizations.

Programs in nutrition cannot be compared with those in dietetics. Programs and degrees offered at similar institutions in nutrition appear to be self-regulated and duly considered alternative to traditional higher education.

There are professional organizations with high standards that deal with nutrition. For example, the American Society of Nutrition, the parent organization to the American Society of Clinical Nutrition, is open to any individual with a doctoral-level degree (i.e., PhD, MD, DDS, DVM, DPharm, etc.) in nutrition or a related field from an accredited institution with notable accomplishments as a lead, senior, or other author of a nutrition publication in a peer-reviewed journal Members of the American Society of Clinical Nutrition have published research in peer-reviewed journals. The journals of the American Society for Nutrition have a long history. The *Journal of Nutrition* has been published since 1928. The *American Journal of Clinical Nutrition* has been published since 1952. Graduates with appropriate degrees in nutrition may earn a CNS (Clinical Nutrition Specialist) designation by passing a board-certified exam.

Students may begin courses 'at any time and study at their own pace.' The college states that it takes four months to complete a course, 15 months to complete one segment of the degree program. There are established time limits for degree completion: Associate: 48 months; Bachelor: 72 months; Masters: 36, which appear to be reasonable. It is expected that students will be continuously enrolled, but they may take one—only one—furlough.

3.02.01. C.l Student services
Appropriate students services are undefined by Colorado statutes, rules, and regulations. Nevertheless, in traditional settings, student services include, but are not limited to, academic counseling, financial counseling, psychological

counseling, career placement, computer services, and library and information services.

Degree Completion Rates and Career Placement

HCHS does not offer placement services nor guarantee placement of its graduates which it clearly states. No surveys of employment, employer surveys, or student satisfaction were presented for review.

In reviewing the job placement rate and graduation information on the website of the Tennessee Higher Education Commission, the graduation rates and placement rates are relatively high. The average completion time for the Associates of Sciences in Applied Nutrition is 1,257 days for the two individuals who completed this program. This is almost three and a half years and seems excessive, but since only two individuals were reported as completing the program, the average may be skewed

In some cases, the institution engages in a bit of misleading hyperbole. For example, in the catalog, readers are advised that the completion of the Diploma in Dietary Supplement Science (Dip.D.S.S.) earns one a *globally respected* (emphasis added) Diploma in Dietary Supplement Science (Dip.D.S.S.), a statement difficult to verify and may mislead prospective students to overestimate the usefulness of the diploma.

Several of the diploma programs probably have little recognition and credentialing value. It is doubtful that the general public understands the level of credentials offered by a Dip.S.B.M. (Diploma in Small Business Management), Dip.D.S.S. (Diploma in Dietary Supplement Science), or a Dip.W.N. (Diploma in Women's Nutrition**).** Students completing one of these (and possibly other) programs at HCHS with the expectation of a better position, more pay, etc., may be disappointed. What is a Dip.S.B.M. (Diploma in Small Business Management), Dip.D.S.S. (Diploma in Dietary Supplement Science), or a Dip.W.N. (Diploma in Women's Nutrition**).** If students complete one of these or other programs at HCHS with the expectation of a better position, more pay, etc., one may assume that many will be disappointed.

The first page of the catalog describes a wide arena in which graduates may choose to practice their nutritionist skills. However, it is impossible to determine how realistic these opportunities may be without supporting information.

Financial Counseling

Students are counseled regarding options for tuition payments. They are informed that they must use their own

funds or employer scholarships since state and federal funds are not available. No information has been provided by the institution regarding the level of debts the students incur. The institution's catalog appears reasonably explicit about costs and completion times.

The median completion age for the programs suggest the participants are mid-career individuals with probably less need for some student services than students of traditional age enrolled in traditionally delivered programs.

Computer Services

While the Huntington College of College of Health Sciences offers its courses entirely through distance education, there is no reference in the college's catalog of students' access to any type of computers or the Internet or how the college might support that access.

C 8 Library and Information Resources

According to the State of Colorado requirements, "all (programs) require some use of library resources." There is no mention in the college's catalog library and information resources or any expectations of their use. When queried, the institution supplied a list of free online resources. Some have value. Others have questionable relevance to the course and program offerings. And, any case, the unstated assumption that these free online databases provide all the information resources needed by the students is incorrect. The following is a brief review the databases listed by the college:

HighWire Press is adequately described by the applicants. It does provide some access to nutrition journals, such as the *Journal of Nutrition* and the *Journal of the American College of Nutrition*. However, there is a 12 month embargo for the first and a 24 month embargo for the second, although in checking, the embargo sometimes is less limited. It does not appear to provide access to other mainline nutrition publications such as the *Annual Review of Nutrition*, *Journal of Parenteral and Enternal Nutrition*, *Nutrition in Clinical Practice* (indexed by PubMed), *Journal of the American Dietetic Association*, and the the *American Journal of Clinical Nutrition*, and possibly the *Journal of*

Agricultural and Food Science, although it might less relevant to dietitian/nutrition practitioners.

PubMed is a good source, but again it is a medical database with less relevance to nutrition students at the undergraduate level.

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Project Bartleby is largely a collection of old classics and of very modest use as a source of scientific information, unless one includes the 1918 edition of Gray's Anatomy of the Human Body.

Project Gutenberg is a collection of some 28,000 texts that are mostly works of Western literature and all in the public domain, which they are dated and limited use for most academic programs, and particularly one in nutrition.

Anneberg Media is as the applicants described it, but students would have to be very persistent to find online videos to supplement their course work offered by this institution.

Linus Pauling Institute's Micronutrient Information Center is associated with Oregon State University has some decent links and some good information, but far from exhaustive.

National Institutes of Health: Office of Dietary Supplements appears a bit of a convoluted way to get to *The Dietary Supplements Labels Database*, which offers information about label ingredients in more than three thousand selected brands of dietary supplements. It enables users to compare label ingredients in different brands. Information is also provided on the "structure/function" claims made by manufacturers. *These claims by manufacturers have not been evaluated by the Food and Drug Administration. Companies may not market as dietary supplements any products that are intended to diagnose, treat, cure or prevent any disease.*
Ingredients of dietary supplements in this database are linked to other National Library of Medicine databases such as MedlinePlus® and PubMed® to allow users to understand the characteristics of ingredients and view the results of research pertaining to them, including the following characteristics:

- Uses in humans

- Adverse effects
- Mechanism of action

The website is:
http://dietarysupplements.nlm.nih.gov/dietary/index.jsp
and it should be quite useful to the Huntington students.

MyPyramid is an update released in 2005 of the American food guide pyramid. While nutrition students should be familiar with it, the site is intended for the general public, as opposed to an academic audience.

National Library of Medicine's Bibliographic Citation just provides guidance on how to adequate cite resources

Vocational Information Center: Online Tutorial Resources is of marginal value. It would take a very persistent student to find something of significant value related to the curriculum of this institution.

There are several omissions from the databases listed. Probably the most significant database in the field is FSTA - Food Science and Technology Abstracts®, which describes itself as the world's leading database of information on food science, food technology and nutrition.

In addition, the National Center for Complementary & Alternative Medicine (NCCAM) provides a website relating to herbs at: *http://nccam.nih.gov/* The National Center for Complementary & Alternative Medicine (NCCAM) is an institute of the National Institutes of Health which is "dedicated to exploring complementary and alternative healing practices in the context of rigorous science, training complementary and alternative medicine (CAM) researchers, and disseminating authoritative information to the public and professionals." This site includes links to information on alternative medicine and consumer health, research, clinical trials, news and events, and training.

There are some standard print references not mentioned, such as

CRC desk reference for nutrition

Benders' dictionary of nutrition and food technology

In addition, there are probably hundreds of relevant works only available in print. A cursory review of the Drexel University Library using the subject heading "nutrition" revealed they have 168 books with that subject heading with a copyright from the 2000 to the 2009. Drexel University Library has 42 journals (with some duplication) with the word "Nutrition" in their titles.

While it is not necessary for the Huntington College of Health Sciences to have all these monographs or journals, the college makes no mention in the application of funds to purchase such materials either in print or electronic formats. Nor does it mention various venues, such as online databases, portals, scanning services, or mail services, to make library and information resources available to its students. In addition, this not any indication of an expectation of the faculty members to teach students how to remain current in the discipline through learning how access, read, and understand the literature of the field. These all add up to a severe deficiency in the institution's program.

5. Admission and Academic Policies

The office and administrative staff consists of a Director/ Registrar, a CAP (Central Assignment Processing) Department Director, Enrollment Specialist, Office Manager, and part time/special needs employees. This is modest staff to offer any extensive student services.

> The CAP Department Director is an unusual position in this reviewer's experience in that part of his/her job description is to "distribute assignments to instructors vie email or post." It is not clear why students to not send assignments directly to their professors. Also, this individual "grade all multiple choice assignments and return graded and corrected multiple choice assignments to students."

HCHS has delineated in the Academic Policies how faculty members and students are to communicate via phone and e-mail. The financial information suggests that the faculty members are part-time, but there is no information as to teaching responsibilities either as to teaching particular courses or how many students for which they are responsible to at any given time.

Admissions

The College has an Open Admissions policy. Application may be made by mail or fax. Prospective students are expected to present official documentation of high school graduation or GED.

Advanced standing is available through typical methods:

*Transfer of credits
*Credit by examination
*Prior learning assessment

However, the methods of testing/instruments used are not provided in the documentation.

There is no evidence that students are tested prior to enrollment to determine placement in classes. In addition, there are no provisions for students requiring special assistance or developmental classes. The catalog states that the college does not offer tutoring. Yet, an e-mail from the Academic Dean refers to a website which students may consult.

Referring students to a website is more than a little unusual in that there is no evidence that students actively use internet resources in their studies.

Transfer of Credits
The college clearly states that transfer of credits TO or FROM Huntington College is not guaranteed. Students must verify that they understand and accept this policy when signing the enrollment agreement.

6. Financial Resources

C. 10 Authorized colleges are expected to have sufficient resources to 'sustain itself' once students have been admitted.

The cover letter to the financial report is dated August 5, 2008 and is unsigned. The writer states that the information was compiled in 2006 by another accountant and did not express an opinion or provide any other form of assurance about the statements, all factors which raise concerns. These are:

1. *The college has not tested goodwill or other intangible assets (valued at $147,500) for impairment*
2. *The report presented to management omitted substantially all disclosures*

As noted in the report, actual amounts of revenues and expenses could be different from those reported. The reviewers recommend that the college should be requested to submit the appropriate materials.

Between January and December 2008, HCHS expended 0 dollars on computer and Internet expenses and course development and a modest $2,703 on "dues and subscriptions," which may—or may not—mean library resources. These amounts seem hardly adequate to support the programs offered.

The reviewers could not determine the adequacy of salaries paid to faculty, administrators and support personnel. Wages in 2008 are stated as $73,600. The question of professional leadership and support must be raised with respect to appropriate compensation. Completely absent are salary lines for the registrar, dean, enrollment specialist, and other administrative staff.

Net income in 2007 was $26,622. The following year, 2008, it was ($22,289), trending in the wrong direction and leading to serious questions about the institution's viability in the future.

7. Statement of Accreditation Proof

The college provided a letter, dated April 20, 2009, from the DETC Accrediting Commission. The Executive Director states that the institution was reaccredited most recently in June 2005. DETC is recognized by the Council for Higher Education Accreditation (CHEA) and the U. S. Department of Education. The letter of April 20, 2009 states regarding the accreditation of HCHS:

"What this means is that all programs of instruction offered by the institution have been examined by independent objective subject matter experts and have been found to meet or exceed the Accrediting Commission of the Distance Education and Training Council's published academic and ethical standards. These standards require the institution's courses and programs to be equal to or better than a comparable course or degree program offered by a residential college or university accredited by an agency recognized by the U.S. Secretary of Education."

This standard would appear to be minimal and not necessarily in line with the State of Colorado requirements (Degree Authorization Act) or higher education practices recognized by regional or discipline-related governing bodies. Three private colleges accredited by DETC are listed in the Colorado Higher Education website: American Sentinel University, Aspen University, and William Howard Taft. Note 1: American Health

Sciences University is not listed. Note 2: The DETC website also lists American Sentinel University, Aspen University, Weston Distance Learning—McKinley College and U. S. Career Institute, and Yorktown. Taft is not on the DETC list.

8. Application Fee

No information provided.

Huntington College of Health Sciences

STRENGTHS

Authorization:

1. Three HCHS representatives (two members of the board of governors and the registrar) have completed DETC evaluator training.

Mission:

1. The mission statement is consistent as described in published materials.

Institutional Organization

1. Names of the governing board, advisory board, owners and faculty were provided.

Degree and Academic Programs

1. The master's program appears to attract student, with the highest number of students in any degree program.
2. The HCHS catalog is detailed in several areas, including the costs that will be incurred for instruction. Students are informed about diploma and degree requirements.
3. Enrollments may occur at any time, rather than on a semester basis. An estimate is given in the catalog concerning how long it will take to earn the diploma or degree.

Admission and Academic Policies

1. Applicants must present minimum qualifications of a high school diploma or passing GED score. Master's students must hold an accredited bachelor's degree. Provisions are made for accepting international students.
2. Students may receive advanced standing through a number of approved methods.
3. Transfer of credit policies is explicit. On enrollment at HCHS, students must sign a form that they have read and agree with the policy.

Financial Resources

1. None noted

Statement of Accreditation Proof

1. The materials are adequate.

WEAKNESSES

Authorization:

1. HCHS does not have a physical presence in Colorado.
2. The latest accreditation by DETC was conducted in 2005; it is unclear how frequently these reviews are conducted.
3. Evidence is not provided regarding whether the institution has been prohibited from doing business in another state.
4. The Board of Governors did not include a member representing the public interest.
5. The Academic Dean is a member of the Board of Governors.
6. There does not appear to be an organization for faculty governance or opportunities for faculty to regularly meet to evaluate curriculum for currency and content.

Mission

1. Although the mission includes "health sciences," it is unclear what is meant by that term, since the only degrees are in nutrition (except business management, cited elsewhere). Note: Nutrition programs are considered part of the 'science' curricula rather than the 'health sciences.'
2. The college does not explain how its programs relate to the higher education community in Colorado.
3. Information on faculty qualifications is limited and does not include resumes, publications, professional activities, etc.
4. Textbook lists are generally undated and lack specifics about edition #s and relationship to the courses offered.
5. HCHS materials refer only to the use of videos, faxes and traditional mail. There is no mention of utilizing advances in technology that have been exploited to a high degree by non-traditional, e-learning programs, i.e. WebCT and Blackboard. Students in academic programs should be expected to use appropriate technology for assignments and research. Advances in technology have been exploited to a high degree by non-traditional, e-learning programs, i.e. WebCT and Blackboard. Students in academic programs should be expected to use appropriate technology for assignments and research.

Institutional Organization

1. The materials lacked a traditional academic organizational chart (dean, departmental organization, student services, administrative staff, etc.)
2. Information regarding the number of faculty members is inconsistent.

3. There is no faculty matrix which includes degree information and subjects/programs that faculty teach.
4. Some faculty members' credentials may not be from accredited colleges or universities; several are graduates of HCHS.
5. Approximately $60,000 was paid in contracted services in 2008, as listed in the auditor's report, leading to questions about such limited payment and how it can provide the high quality professional services HCHS states it provides.

Degree and Academic Programs

1. If Colorado is expected to authorize courses offered only in California, insufficient information has been provided about them.
2. Applicants to HCHS must present only a high school diploma or GED (except for the master's degree). The college does not offer preadmission testing, tutoring, or developmental coursework.
3. Students are expected to be enrolled on a continuous basis. Only one 'furlough' is granted or they will be dismissed.
4. The college reports that "No student has been dismissed for academic failure." Given the lack of tutorial services and the relatively generous admissions standards, this suggests relatively low academic standards.
5. Basic student services such as academic advising, counseling (personal and career), and support for underprepared students are not available on a regular, dependable basis.
6. Completion and placement rates for graduates are extremely low.
7. The number of credits and scope of the general education requirement are lower than in traditional academic programs; it is impossible to assess their rigor.
8. The college does not offer placement services nor guarantee placement of its graduates. No satisfaction surveys of either employee or employer have been conducted.
9. The differences between a registered Dietician and a certified Nutritionist could be confusing to many students.

Financial Resources

1. Financial information provided for review is unsigned, contains many disclaimers of regarding its scope, and no opinion is expressed regarding the financial statement as a whole.
2. Management of finances has been a problem.
3. Given the number of students, resources for salaries and operations are a fraction of what would be expected.
4. It would appear that expenditures for course development, investment in learning resources and equipment, and adequate support staff are highly inadequate in meeting either the

standards claimed by the institution or generally accepted academic standards.

Statement of Accreditation Proof

1. The DETC list of accredited institutions in Colorado does not match that of the official Colorado Higher Education approved list.