

27 August, 2009

Ms. Heather DeLange
Degree Authorization Act Officer
Colorado Department of Higher Education
1560 Broadway, Suite 1600
Denver, CO 80202

Dear Ms. DeLange,

Needless to say I am very disappointed with the outcome of your Committee's evaluation, and subsequent denial of our Institution's authorization in Colorado. I strongly believe that you have chosen to take an antagonistic position against us because you told me that a representative of an inquiring institution, shortly after you assumed your position, revealed that he was interested in Colorado because you were known to be "easy." Your response was "never again." Then, first out of the chute, we became the sacrificial lamb. It almost seems that you had a preconceived outcome in mind and that your Committee fulfilled it. Why else would they review a school without regard to all the information they needed. They had only to ask and we would have gladly answered. We meet every Standard to be accredited by the Distance Education and Training Council (DETC.) For those of your reviewers that are not familiar with this organization, they are granted the privilege to accredit worthy learning institutions by the United States Department of Education. They have reviewed more institutions than one. Their process is fair, but extremely rigorous, a fact also apparently unfamiliar with some of your reviewers.

I am saddened that Huntington College of Health Sciences (HCHS) had to be the first school to go through your process. I am sure that as time goes on your office will become more efficient and inherently fairer. We thoroughly filled out every document you provided us with and answered every question you asked us. However, your reviewers appeared still to have many important questions unanswered. Had we the opportunity to respond to the lack of clarity there may have been a more favorable outcome.

We at HCHS do not understand why Colorado has chosen to take this negative position against HCHS and DETC, when just a short time ago we were heroes that averted an educational scandal. We were certainly good enough to fulfill the "teach-out" agreement for 95% of American Health Science University's student body when that institution in Aurora, Colorado lost its accreditation in January of 2008. As a matter of fact, officials at the State of Colorado Department of Higher Education expressed their thanks to us for doing so. For some reason, it now seems that HCHS and DETC no longer meet Colorado standards.

Nonetheless, with every evaluation comes some good. There were a few points raised and opinions stated that made sense, and moving forward, may be incorporated into our practices. In the meantime I felt it only fair that my reviewers review yours and I would like to share their responses.

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

An additional source of information should have come from face to face discussions with our Department heads to clarify misinformation or misconceptions. DETC does this in the form of a site visit. We, however, would have been happy to come to you.

Institutional Summary

This was completely accurate.

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.

HCHS would have been happy to present these Non-Credit Short Courses to the review committee had we been asked. These courses are excellent sources of information in nutrition and are usually taken for personal edification in that discipline.

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.

If this was important, the State of Colorado Department of Higher Education should have looked it up, or inquired of HCHS or DETC to determine the answer.

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.

HCHS has never been prohibited from doing business in any state. We were never made aware of any documentation that the committee required regarding this issue.

Articles of Incorporation

The college is presently incorporated in the State of Tennessee.

This is incorrect. We are a California corporation.

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.

Why is the word college underlined? Is this intended to be some kind of an insult? And, why do you refer to us as a ‘correspondence school’? HCHS does not educate through traditional correspondence methods, but rather by a hybrid method in which assignments are typically delivered via e-mail and students return completed assignments in the same way. Furthermore, various courses involve the use of research and even the viewing of streaming video via the internet. Consequently, distance education more aptly describes HCHS method for delivering education. Nevertheless, as a backup we also provide a correspondence format for each course since the American Council on Education requires institutions to have both available in order to become affiliated.

As admitted in personal communiqué, one of the reasons HCHS chose Colorado was because it was a forward thinking State in the area of Integrative Health Care.

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.

When an accredited institution contemplates a move to a new location, the institution must notify the Executive Director of DETC in writing, which we did. Before accreditation can be affirmed for the new institution location, the institution must prepare a *Change of Location Report* and undergo an on-site visit. An on-site visit must take place within six

months of the change of location. HCCHS invited Colorado to perform a site visit anytime after we opened the office. We were told that Colorado would defer to DETC.

Board of Trustees/Governors/Owners

HCCHS' 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.

Does being atypical violate a Colorado law or regulation?

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.)

The State of Colorado Department of Higher Education did not ask for resumes.

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 HCCHS.

In fact, one of the members of the Board is completely autonomous from HCCHS and is present to solely protect the public interest. Does it violate a Colorado law or regulation if three of the four members of the Governing Board are closely related to owners of the HCCHS?

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 HCCHS.

There is an extensive process for course and program development and review, outlined in a document called *Program & Course Development Guide*. It was submitted to and approved by our accrediting agency, the Distance Education and Training Council (DETC) in 2005. Had we been asked, we would have been happy to forward this lengthy publication.

In addition, our courses must be accredited by DETC. As part of the accrediting process, DETC submits each course to a subject specialist. After a course is approved and made a part of a program the instructor of that course typically updates it in accordance with *Program & Course Development Guide*. We are always contacted by the publishers of the

texts we use when an updated version is available. The instructor will evaluate the newer version of a text to determine if significant changes have been made or if tables have been updated. If significant changes have not been made to the text and it is more cost effective for the students to continue in the older edition then edits are delayed until the older edition is no longer available.

Our study guides are exclusive to the course and are authored by the instructors and/or other subject specialists. The study guides for each course is edited at the time of any change in a text. This system has worked for us for over 24 years. HCHS would have been happy to provide more detailed information about our process for course and program development had the committee asked us for such information in the first instance.

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.

Just for the record, nutrition is, in fact, a health science. Furthermore, in 2005 our institution was renamed from “American Academy of Nutrition – College of Nutrition” to “Huntington College of Health Sciences” to reflect our plans to introduce new programs in the health sciences. Although, the development of quality academic programs in the health sciences takes time, HCHS has already received accreditation for, and is immediately prepared to launch a Diploma Program in Herbal Science. We have plans to follow with other Herbal programs and degrees. In addition, we have recently affiliated ourselves with a medical doctor who practices homeopathic medicine in addition to conventional medicine. He is eager to develop programs in Homeopathy. There also are plans in the future to develop programs in Pharmacy and Nursing. HCHS’s is not just to be a school of nutrition and our immediate plans are consistent with that.

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.

Was any attempt made to learn more about our faculty before suggesting that HCHS may be misleading 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.

What is actually remarkable is the incorrect assumption being made by the reviewer(s). In fact, HCHS utilizes online streaming video and other internet resources for many of our courses. Furthermore, e-mail via the internet is used primarily for communications between administration/faculty and students. This includes the delivery of assignments in both directions. Furthermore, for two years HCHS has been undergoing an extensive, long-term project of building our courses into Moodle, an online learning platform similar to Blackboard and Web CT.

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.

The State of Colorado Department of Higher Education did not ask for this information.

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.

Three faculty members were added after the application was completed for Colorado.

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.

Tennessee Higher Education Commission requires that HCHS have a School Personnel Report form on file for each faculty member. These forms list all post-high-school education, experience prior to their position at HCHS and their current Educational Responsibilities. The forms are readily available and we would have been happy to provide them to the committee if we had been asked for more information. We also require transcripts from each faculty member. These too would have been easy to provide for the committee to review, had a request been made.

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.

Our instructors are required to submit transcripts from each institution from which they have earned credits. We are currently unaware of a faculty member not having graduated

from an accredited institution. We would have preferred the committee to be more specific in its critique.

Our faculty members are offered the opportunity to take any courses or programs at HCHS without having to pay for tuition. This serves as an opportunity for the faculty members to gain knowledge in the nutrition field and to also earn Continuing Education hours required by the college.

Furthermore, simply because some of our instructors hold degrees from HCHS, this should in no way call into question the quality and rigor of the courses. Remember, each and every course must be reviewed by a DETC Subject Specialist before receiving accreditation. Is the committee suggesting that DETC is in the practice of accrediting courses that lack quality and rigor? Or, does the reviewer take issue with an instructor teaching at an Institution of which he or she is an alumnus. The University of Southern California School of Pharmacy did not have a problem asking me back home to teach. Is there a law or regulation in Colorado that prohibits this activity?

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.

This is redundant to a point made a few paragraphs back. Nevertheless, since you have seen fit to repeat it, we will respond accordingly:

Tennessee Higher Education Commission requires that HCHS have a School Personnel Report form on file for each faculty member. These forms list all post-high-school education, experience prior to their position at HCHS and their current Educational Responsibilities. The forms are readily available and we would have been happy to provide them to the committee if we had been asked for more information. We also require transcripts from each faculty member. These too would have been easy to provide for the committee to review, had a request been made.

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.

\$73,570.88 represents 30% of the schools income. The instructors are contractors and are paid a percentage of the tuition paid by the students for their courses. Each instructor submits a compensation sheet upon receiving the first assignment to be graded and is paid for grading the entire course at once. Although semester hours are earned for the completion of a course we are not on a semester system, therefore, an instructor will have only a few students at a time. The students are at different points of progression in the course.

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 State of Colorado Department of Higher Education did not request this information.

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.

The State of Colorado Department of Higher Education did not request this information.

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.

The objections here truly appear to be petty, biased and ill-considered. For example, it may be the NANP member in question has a Master’s degree in nutrition, or holds a Doctorate in a closely related field. Without investigation you should not be so ready and willing to assume that the member is unqualified for producing continuing education materials. Do you think the NANP doesn’t check the qualifications of individuals that develop these materials? In addition, your comments about ACBN and chiropractors are most telling. Why should it be an issue that the president of the organization is a chiropractor (a licensed healthcare professional)? Furthermore, why should it be a problem that on his own website he markets his products and services? Are you suggesting that doing so is in some way unethical? If so, you are mistaken. Furthermore, you should know that many healthcare professionals often recommend and sell dietary supplements. Physicians often sell pharmaceuticals that they prescribe. Finally, why in the world should it be an issue that fifty-one percent of ACBN’s membership must be chiropractors? After all, the organization was founded by chiropractors. In addition, according to the Association of Chiropractic Colleges (http://www.chirocolleges.org/prospective_students.html) the typical chiropractic college

curriculum includes coursework in nutrition/dietetics. Consequently, you no longer need 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 Degree 22

Bachelors Degree 21

Master Degree 44

Comprehensive Nutrition Diploma 66

Women 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 26 (California Office)***

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

Many HCHS students are planning their own practice in clinical nutrition upon graduation. This program is offered to help them better manage their business. Other HCHS students work or are planning to work in natural food stores. Again, this program can help them manage that business.

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 California courses are certificate courses. They are not college credit courses. Had we been asked, we would have provided them for review in Colorado.

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.

Each student is advised that they may order the texts used for the courses through Huntington College of Health Sciences. They are further advised that we sell only new books which can be expensive. We sell our books at our cost. We are not in the book selling business. We recommend to students that they purchase their books used which is much

more cost effective. We provide them with a booklist and several websites from which many students have had considerable savings in ordering used material. Had you asked, I would have been happy to send you the list and website.

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

This is correct. HCHS believes in removing obstacles to higher education rather than setting up roadblocks. We like to give students a chance to demonstrate that they are capable of doing the work. Furthermore, our student demographics indicate that our “average student” is not fresh out of high school, but rather a working adult with some college coursework already completed, and looking to continue his/her college education. These are not individuals attending a community or state college and still trying to figure out what they want to do with their life. Our students know exactly the subject matter in which they want to receive an education (which is why they came to HCHS in the first instance), and they are generally paying for that education out of their own pockets and/or through loans since they are typically one or more decades past when their parents would tend to pay for it.

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.

Each student is called prior to enrollment to let them know their application has been received. During that call they are asked what their goal is for their nutrition education to ensure that Huntington is a right fit for them. As we have stated before our student demographics indicate that our “average student” is older not fresh out of high school. These students are sure that a nutrition education is what they want and that our course offerings will help them in meeting their goals.

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

Is it a prerequisite for acceptance into Colorado that comparable programs were previously authorized? If not, why do you ask? If so, you’ve already named one program. In addition, see the response to C. 7 below.

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.

This observation is a red herring. Of course HCHS has not made teach-out plan for itself. It is difficult to imagine any post-secondary institution developing such a plan for itself

until such time it was evident that the institution would be unable to continue delivering accredited education to its students.

However, since HCHS recently performed a “teach out” as a courtesy to the State of Colorado Higher Education and DETC, we have such an agreement, which we were required to draft, in our files. We have also identified several Institutions we could go to should the unlikely situation come to fruition.

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.

To reiterate, our students are typically working adults with strong, fixed educational goals. They find the time in their busy lives to focus and do the work (often after their children are asleep), and do not tend to require the hand-holding or support of a tutor. This is consistent with a recently published meta-analysis by the U.S. Department of Education which found that, on average, students in online/distance learning conditions performed better than those receiving face-to-face instruction.¹ As such, they are serious in their goals and tend to apply themselves diligently. The fact that no student has been dismissed for academic failure is a testament to the dedication and hard work of our student population, and should not call into question our academic standards.

This is a perfect example of bias. Could it not be equally possible that the coursework is so clear, the study guide so comprehensive, and the instructors guidance so superior that students do not need to be dismissed for academic failure? Shouldn't a non-bias review have suggested both possibilities?

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:

	<i>Completions</i>	<i>Placements</i>
<i>Associate degree</i>	10	2
<i>Bachelor degree</i>	0	3
<i>Comprehensive Nutrition</i>	21	27
<i>Individual Courses</i>	0	3
<i>Master degree</i>	6	8
<i>Natural Sciences</i>	0	NA
<i>Sports Nutrition</i>	0	NA

¹ Means B, Toyama Y, Murphy R, Bakia M, Jones K. Evaluation of Evidence-Based Practices in Online Learning: A Meta-Analysis and Review of Online Learning Studies. U.S. Department of Education. Office of Planning, Evaluation, and Policy Development Policy and Program Studies Service. Center for Technology in Learning; 2009.

The statistics for placements include students who completed courses but did not graduate from a degree or diploma program. These students are working in the nutrition field and are considered by the Tennessee Higher Education Commission to be placed.

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.

According to convention, the number of credits required to earn certain degrees are as follows:

- **Associates** **60 semester hour credits**
- **Bachelors** **120 semester hour credits**
- **Masters** **36 semester hour credits**

At HCHS, our students must complete the following number of credits within prescribed academic programs to earn the degrees indicated:

- **Associate of Science in Applied Nutrition** **60 semester hour credits**
- **Bachelor of Health Science in Nutrition** **127 semester hour credits**
- **Master of Science in Nutrition** **37 semester hour credits**

In comparison, the Colorado State University’s requirements for completion of similar degree programs are:

- **Bachelor of Science in Food & Nutrition Science** **123 semester hour credits**
(Nutrition Sciences Concentration)
- **Master of Science in Dietetics** **35 semester hour credits**
(Nutrition Sciences Concentration)

With regard to the number of credits required to earn similar degrees, it appears that the committee is holding HCHS to a higher standard than CSU.

With regard to the scope of general education requirements, HCHS is required to so show comparisons to similar degree programs when submitting our degree programs for accreditation to DETC. As an example, I have in my possession a document comparing our new Bachelor’s program to four Institutions, including the University of Northern Colorado. I would have been happy to include this document in the materials we sent you had you asked. It clearly shows HCHS general education requirements compare favorably—even to those of the University of Northern Colorado. Again, it seems that the committee is holding HCHS to a higher standard than other institutions in Colorado.

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).

ENG130 (English: Reading Enhancement) is included to help students develop techniques for more effective studying, reviewing, memory development and exam taking. It also teaches students how to discern the author's perspective and bias. We believe that these are important skills to hone in preparation for some of the more advanced and critical thinking courses that comprise the Bachelor's program.

HCHS is a *distance* education institution. Of course we cannot offer actual laboratory experiences, nor would it be advisable to ship chemical or biological materials through the mail to facilitate an unsupervised "home laboratory" experience. Nevertheless, we use appropriate textbooks, assignments and assessments to ascertain that the student has obtained a firm grasp of the subject matter. Furthermore, DETC subject matter specialists who reviewed these courses in the first instance verified that these courses have met the standard for higher education.

General education courses in BUS 140 (Contemporary Marketing), BUS 142 (Managing a Small Business) and MAT101 (Business Math) are all appropriate choices for our students. As graduates, they will likely be running their own clinical nutrition practice or running a natural product retailing business. These courses will help them to prepare for the business aspects of these jobs. Furthermore, CDV 144 (Child Development) is certainly an appropriate course since graduates will likely be dealing with children at some point in their jobs, and this course includes assignments on the nutritional aspects of child development.

At the master 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.

Again, we would have been happy to provide this information had you but asked. In any case, NUT530 (Nutrition Assessment) includes a section on biochemical (laboratory) assessment of nutritional needs. In addition, we have another elective course, HEA805 Clinical Application of Laboratory Data, which provides additional data on this topic to those who are interested in obtaining it.

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.

This is absolutely ridiculous. HCHS is always very clear about this issue with prospective students. In fact, both the *F.A.Q.* sections of our website and catalog state, "In any case, the use of "Registered Dietitian" or "Dietitian" are restricted to those individuals who met the credentialing requirements of the American Dietetic Association. Please do note that none of the programs are intended to lead towards a Registered Dietitian (RD) credential."

Furthermore, in the *Careers* section of HCHS's website, a clear description is given between a "Nutritionist" and a "Dietitian." In that section, the following text appears: "The nutritionist does not specifically specialize, nor hold him/herself out as being expert, in kitchen management, management of private, public, and governmental food facilities, menu planning, labor relations, and other technical matters within the purview of the dietitian."

In addition, any prospective student that contacts HCHS inquiring about academic programs leading to the RD credential, are promptly told that HCHC does not offer such programs. We then refer them to the Eatright.org website for the American Dietetic Association to find ADA-accredited degree programs at different colleges and universities.

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.

See both our immediately previous response, as well as the immediately subsequent response.

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.

The prior paragraph is a good example of how the committee did a poor job at adequately reviewing HCHS. On our website under the description of our Bachelor's program it clearly states: "Graduates of the B.H.S. program will have met the academic requirements for Professional Membership in the Society for Nutrition Education (<http://www.sne.org/>), and for Associate Membership in American Society for Nutrition (<http://www.nutrition.org/>).

In addition, our website also clearly states that graduates of our M.S. program "will have met the educational requirements for eligibility to take the American College of Nutrition's national board examination for Certified Nutrition Specialist (CNS)."

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.

If this is a question, please state it as such. If you are asking for more information about HCHS's policies regarding the time allowed to complete a given course or time allowed for 'furloughs' between courses, then you should have made the request accordingly. It is not clear from the previous paragraph what information was lacking.

3.02.01. C.1 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.

This is a distance learning setting. We are a very small school and do not have health services with a nurse that gives flu shots each Fall. However, HCHS provides all of the above 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.

HCHS is not a vocational school. We do not provide placement of our graduates and we so state. However, Tennessee requires such data and had we been asked, we could have provided it.

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

Many of our students have decided to change careers. While completing their education they are generally still employed and many are responsible for family support as well. The traditional brick and mortar school does not provide a flexible schedule that allows the student to continue their employment and family duties while completing a degree. We

have found that allowing up to 4 years for the traditionally 2 year Associates Degree encourages students to complete and meet their goals.

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.

All business, educational institutions included, utilize some marketing terminology. Nevertheless, you may be correct in that the term “globally respected” is an overstatement. Consequently, we put this issue on the agenda for an upcoming board meeting to consider for removing the word “global.”

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 assumption of disappointment is yours only. Our graduates have expressed satisfaction with the diplomas they have earned at HCHS. You are assuming that earning one of our diplomas doesn’t help a student in their career goals. This assumption is incorrect.

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.

Were you asking for supporting information? If so, why not make that request plainly. In any case, each and every one of the opportunities listed are indeed realistic.

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 institutions catalog appears reasonably explicit about costs and completion times.

This information was given in an earlier document presented to the committee yet the committee obviously never reviewed that document. To reiterate:

We counsel each student on their option for tuition payment. Their options are paying for the courses in each program one at a time, paying by the Tuition Payment Plan which is interest and fee free and paying for an entire program. Even though the student has the option of paying for the entire program we discourage this. We tell the students that life often gets in the way and their money would be tied up until a refund is made. The majority of our students, no matter the program, choose to pay course by course.

We encourage the students to check with the Human Resource Department where they are employed as many companies have education programs by which they reimburse tuition paid after a course is passed. We are also happy to invoice companies for tuition when the program allows.

We process active military tuition assistance vouchers. You will find our school listed as approved by the Department of Defense and listed on the DANTES website. The service member is responsible for the registration fee and any books ordered from us. They are allowed to progress with their course before we receive payment for the course.

At this time, Huntington is not a Title IV school therefore we do not process any type of Federal Loans. We do let the student know that we are happy to provide letters of enrollment, verification of accreditation and authorization or assist in a conference with loan officers if they choose to pursue loans for their education.

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.

Given this observation should not most of the criticism presented in this document been abated?

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.

Should this be a catalog requirement when in today's day and age almost everybody interested in distance learning has a computer? Should some credit be given to a prospective student to ask if there might be a problem? HCHS was prepared to supply free computers to military students deployed but the notion was regulated against.

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 Enteral 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.

Having used PubMed/MedLine for decades, we can unequivocally state that it has significant relevance to nutrition students at both the undergraduate and graduate level. With few exceptions, virtually all of the nutrition journals are indexed in PubMed.

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 Grays 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 adequately 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

It has been the experience of the faculty and students at HCHS that the aforementioned resources have been more than adequate at meeting students' needs for libraries/databases for research purposes. Nevertheless, we are always interested to learn of additional resources.

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.

Drexel University reports annual revenues in excess of \$750,000. HCHS will be revisiting this subject long before its revenues reach this level. I wonder how Drexel University's

Library compares to the University of Southern California's Medical Library. I attended USC and received a Doctor of Pharmacy degree having never stepping inside that multi-level building. The first time I visited the Library was in 2006 when I signed up for a password to access its holdings on-line. Because other sites available to me, free of charge, via the internet, I have not needed to access USC's library.

I would like to refer you to: <http://www.nccn.org/index.asp>. This is a website that is used by Oncologists all over the world to verify that their therapies meet the most up-to-date standards of the nation's most prestigious cancer experts. This site is free to access by anybody. Just because a website is available to the public at no charge does not make it inferior.

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.

Our resources are not listed on our website or in our catalog. That information is provided to students once they have enrolled in courses. Again, we reiterate that it has been the experience of the faculty and students at HCHS that the aforementioned resources have been more than adequate at meeting students' needs for libraries/databases for research purposes. In addition, the purchase of journals in print form would be pointless for a distance education institution. The electronic versions of many of these journals are available through the previous resources we listed. Having a book or journal sitting in our offices will not benefit our student in Egypt.

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.

We are a very small school whose student satisfaction rate is among the highest in the industry.

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 via 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."

What is the significance of these comments?

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.

Once again, this is not information that you previously requested. Nevertheless, had you requested it I would have been happy to send you our 50 page Faculty Handbook

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.

We would have been happy to provide this information had it been asked for.

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.

You are correct that we do not test students prior to enrollment. For the 24 years this institution has been in business, we have not tested students prior to enrollment. Our experience has been that student demographic is quite capable of doing the coursework assigned. As previously described, our typical student is not the teenager who has just graduated high school. Rather, most of our students have already completed some college level coursework at another institution.

We do, however, have detailed conversations with our students before they begin their first course with us. During the conversations, we obtain a good understanding of their ability to perform academically. As an institution with hundreds of students, rather than thousands, this is a service that we regularly practice.

You are correct that the college does not offer tutoring. That being the case, doesn't it make sense that the Dean of Academics would refer students to other tutoring resources? Is that a problem in some way?

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.

You are incorrect that students do not use internet resources in their studies. As a matter of fact, some courses refer students to specific websites as part of their assignments. In any case, in the twenty-first century it is hardly “a little unusual” that a student is referred to a website.

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.

This is correct. Is there a point?

6. Financial Resources

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

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Huntington University, Inc. DBA Huntington College of Health Sciences and its predecessor American Academy of Nutrition have been in business for 24 years. There is no reason to conclude that the Huntington College of Health Sciences does not have sufficient resources to ‘sustain itself’. (See below)

The cover letter to the financial report is dated August 5, 2008 and is unsigned.

This unsigned financial statement was part of the original submission to you. The original signed copy has been filed with the DETC. Had you wanted or needed a signed copy you should have added this fact to your original request for more information. Please note the 2006 statement was a “compiled statement” with “notes to the financial statement.” The 2007 statement was a “reviewed statement” also with notes. Upon submitting our 2007 statement DETC advised us a reviewed statement was not required by them. Since Huntington University, Inc. is a small closely held corporation and the fact that a compiled statement satisfied DETC, the board decided against the relatively large expenditure for a reviewed statement. All statements herein referred to were prepared by California licensed Certified Public Accountants in compliance with the AICPS rules and regulations.

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.

The 2006 financial statement was prepared by our previous CPA. It is standard language for the new accountant to express no opinion on the previous CPA's work. Again had you needed the 2006 opinion letter you should have asked for it in your original request for more information.

1. The college has not tested goodwill or other intangible assets (valued at \$147,500) for impairment

While this may be true, goodwill and other intangible assets were valued when the ownership changed in May 2004 by seller and buyer. Again, I point out to you that this is a small closely held company and has been reviewed by a CPA in the 2007 review.

2. The report presented to management omitted substantially all disclosures

You could have asked to read the 2007 reviewed statement page 7 through the end.

As noted in the report, actual amounts of revenues and expenses could be different from those reported.

This is standard language for a compiled statement and conforms to AICPA standards.

The reviewers recommend that the college should be requested to submit the appropriate materials.

Why was this request not made in the original request for further information? Had it been, we would have provided it.

Between January and December 2008, HCHS expended 0 dollars on computer

A new system was purchased in 2006. It is a substantial computer system and does not need to be replaced. You can see that it is listed in our balance sheet under fixed assets.

and Internet expenses and course development

We reclassified course development and listed it under contract labor. Please see our discussion of course development above.

and a modest \$2,703 on "dues and subscriptions," which may—or may not—mean library resources.

Please see our discussion of library above.

These amounts seem hardly adequate to support the programs offered.

Where in the law or any other place that you can provide does it states what is or is not an adequate amount to be spent on “dues and subscriptions”? Please remember this is a distance learning institution not a bricks and mortar university. Our board of directors reviews expenditures at our regular board meetings. Furthermore, as previously mentioned in “3. Statement of Mission”, for two years HCHS has been undergoing an extensive, long-term project of building our courses into Moodle, an online learning platform similar to Blackboard and Web CT.

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.

This entire paragraph smacks of a two tiered review system. You are not reviewing the University of Colorado. Huntington University, Inc. cannot and should not be compared to such an institution. Our financial statement is adequate for our institution. It has been accepted by both the State of Tennessee Higher Education Commission and the Distance Education and Training Council.

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.

I would like to challenge the conclusion drawn here. The trend is positive! Sales and total assets have risen in 2006, 2007 and 2008 respectively. While 2008 shows a net loss, this is a paper loss, generated primarily by our accommodation of a State of Colorado’s Institution’s request to “teach out” their students. American Health Sciences University’s “teach out” altered our debt reduction and provision for reserve.

In the last quarter of 2007 HCHS agreed to “teach out” essentially all the Students of American Health Sciences University. Remember that American Health Sciences University lost its accreditation and was forced to liquidate by you. Your office supported Huntington College of Health Sciences to come to their aid. American Health Sciences University agreed to pay HCHS for the “teach out” of these students. They failed to honor their obligation to pay dollar for dollar for this “teach out.” Huntington College of Health Sciences has, nonetheless, honored its commitment to Colorado to “teach out” these students. AHSU did transfer a portion of its reserves to HCHS. However, HCHS had to increase its reserves in 2008 to over \$52,000.00 from \$18,000.00 in 2007. AHSU contributed less than half. This reserve is really deferred income, a fact that you seem to discount.

Huntington University, Inc. was formed in May 2004 and purchased 51% of American Academy of Nutrition. HUI paid \$75,000.00 down and financed \$75,000. By May 2007 HUI had paid off the \$75,000.00 from operations and then exercised its option to acquire

the additional outstanding 49% for \$100,000.00. \$25,000.00 was paid in cash and \$75,000.00 was financed. During 2008 \$60,000.00 of this debt was paid down from operations. On top of this HCHS put \$25,000.00 into a CD. A careful reading of the financial statements provided you will show all this. Today HCHS is debt free!

Year after year the net assets have increased! To read the financial statement and conclude from the paper loss that the trend puts the schools viability in question ignores and defies the facts herewith listed.

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 Councils published academic and ethical standards. These standards require the institutions 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.

Is this good, bad, or did the reviewer just feel the need to write something?

8. Application Fee

Our application Fees are clearly stated on our applications.

From before our application was submitted, HCHS was encouraged by your office. I asked and was told the size does not matter. In my opinion, reading your “Letter of response,” size does, in fact, matter. There is no compelling reason to deny HCHS the right to conduct business in Colorado! I do not see how in anyway way HCHS could have harmed the State of Colorado’s educational system. We have stood the test of time, employed a staff, met our payroll, and pay all our fees and taxes. We enjoy an excellent reputation, which is what prompted me to respond to your decision. It strikes me as odd that when you needed HCHS to bail you out of the difficult

situation with AHSU, we met every criteria needed to take on this task and clean up a mess. However, it appears that you now have chosen to adopt a different position.

The review process would have made more sense if your Department had a published set of criteria for admission. This way your reviewers could have become familiar with them and simply check the box that says MEETS CRITERIA, DOES NOT MEET CRITERIA, or, PARTIALLY MEETS CRITERIA. If the Institution does not or only partially meet the criteria, why not? This could have eliminated your reviewers from stating the obvious and force them to dig deeper if they have not been given adequate information to check a box. This could also have eliminated much of the bias that is weaved through the report. I can only hope that this bias was not due to any preconceived determination.

While I find your decision insulting to both Huntington College of Health Sciences and the Distance and Education Training Council, I thank you for all the time and effort you put into the process. I believe you did the best job you could have with what you had to work with.

Respectfully,

A handwritten signature in blue ink that reads "Arthur M. Presser". The signature is written in a cursive style with a large initial 'A'.

Dr. Arthur M. Presser
President

CC: Mr. Michael Lambert, Director Distance Learning and Training Council
Mr. Gene Bruno, Dean Huntington College of Health Sciences
Mr. Robert Shmaeff, Chairman Huntington University, Inc.
Ms. Cheryl Freeman, Director Huntington College of Health Sciences
Ms. Julie Carnahan, Chief Academic Officer, DHE
HCHS File