

Colorado State University-Pueblo - CO

HLC ID 1061

OPEN PATHWAY: Reaffirmation Review

Visit Date: 2/13/2017

Dr. Lesley Di Mare
President

Mary Vanis
HLC Liaison

Joyce Hardy
Review Team Chair

Moreen Carvan
Federal Compliance Reviewer

Donna Brown
Team Member

Patrick Guilfoile
Team Member

Michael Hager
Team Member

Matthew Wagenheim
Team Member

Context and Nature of Review

Visit Date

2/13/2017

Mid-Cycle Reviews include:

- The Year 4 Review in the Open and Standard Pathways
- The Biennial Review for Applying institutions

Reaffirmation Reviews include:

- The Year 10 Review in the Open and Standard Pathways
- The Review for Initial Candidacy for Applying institutions
- The Review for Initial Accreditation for Applying institutions
- The Year 4 Review for Standard Pathway institutions that are in their first accreditation cycle after attaining initial accreditation

Scope of Review

- Reaffirmation Review
- Federal Compliance
- On-site Visit
- Multi-Campus Visit (if applicable)

There are no forms assigned.

Institutional Context

Colorado State University-Pueblo (CSU-Pueblo) is a comprehensive regional university within the Colorado State University System. CSU-Pueblo is located in southeastern Colorado approximately 100 miles south of the state capitol of Denver, and serves a diverse semi-urban area with residential campus and extended studies offerings (in two physical locations - in Colorado Springs and at the Fort Carson Army Education Center in Colorado Springs- as well as through correspondence, online, and dual credit modalities). CSU-Pueblo shares a governing board with its two sister institutions, CSU-Fort Collins and CSU-Global. The CSU System Chancellor Dr. Tony Frank also serves as the president for CSU-Fort Collins. CSU-Pueblo's president Dr. Lesley Di Mare has led the institution since December 2011 and is retiring in June 2017. A new presidential search is in the initial stages.

The student body at CSU-Pueblo is diverse, with approximately one-third of the students self-identifying as Hispanic, and nearly one-half self-identifying into under-represented populations. The institution offers 28 undergraduate programs in 70 different fields of study through its residential campus. Ten Masters degrees are also offered. The Institutional Status and Requirements Report indicates CSU-Pueblo is approved for distance education courses and programs, and correspondence education courses and programs. Dual credit and correspondence are two enrichment and access programs offered through the Extended Studies division. The bachelor degrees in social science and in sociology are approved for correspondence offering. The campus is developing online courses which will lead toward the offering of the Master's of Business Administration online in the future.

CSU-Pueblo has implemented substantial changes in policies and procedures to ensure best practice in their academic, student services, and financial arenas. Centralization of the budget and implementation of a new financial system in July 2014 addressed concerns with accuracy and oversight of budgetary processes, which are essential given the ongoing financial constraints the institution is experiencing. Despite these limited financial resources, dedicated faculty and staff, including more recent hires, have provided good leadership and creative responsiveness to the challenging financial environment. The institution still has issues related to financial sustainability based on components of the CFI, contractual issues related to the football stadium maintenance, and inability to make bond payments on the new residential housing without support from the system level. Additionally, many of the new processes have been implemented only recently, so no data analysis of the impact of those processes is yet available.

Interactions with Constituencies

- Colorado State University – Pueblo President
- Colorado State University System Chancellor
- Colorado State University Board of Governors - Chair
- Colorado State University Board of Governors – Members (2)
- Colorado State University Executive Director/University controller (via phone),
- Accountant I, Business Financial Services
- Administrative Assistant III- Scheduling Coordinator, Auxiliary Services
- Administrative Assistant III, Financial Aid
- Admission Counseling Specialist, Counseling Center
- Assistant Director Fitness/Facilities
- Assistant Director of Financial Aid, Financial Aid Operations
- Assistant Director, External Affairs
- Assistant Provost for Assessment, Student Learning and Effectiveness
- Associate Dean for Teacher Education Program
- Associate Director for Center for Academic Enrichment
- Associate Director of Financial Aid
- Associate Director of Recreation Center
- Associate Registrar
- Associate Vice President for Facilities Management
- Athletics Director
- Career Services and Employer Relations Specialist, Career Center
- Chief Information Officer
- Colorado Opportunity Scholarship Advisor
- Coordinator Instructional Technology Center
- Coordinator of Health Education and Prevention
- Coordinator of Student Life
- Counselor
- Dean - College of Education, Engineering & Professional Studies
- Dean - College of Humanities and Social Science
- Dean - College of Science & Math
- Dean – Hasan School of Business
- Dean of Library Services
- Dean of Student Affairs
- Degree Analyst
- Department Chairs (6)

- Director of Center for Teaching and Learning
- Director of Alumni Relations
- Director of Auxiliary Services
- Director of Business-Financial Services – Controller
- Director of Center for Academic Enrichment and Program Coordinator for the Center for Teaching and Learning
- Director of Disability Resource and Support Center
- Director of Diversity & Inclusion
- Director of Equal Opportunity/Affirmative Action and Title IX Coordinator
- Director of Extended Studies
- Director of Financial Aid
- Director of Human Resources
- Director of Institutional Research and Analysis
- Director of Science, Technology, Engineering Learning Center
- Director of Student Conduct and Case Management
- Director of Student Health and Counseling Services
- Executive and Budget Assistant to the Vice President Financial and Administration
- Executive Assistant to the President, President's Office
- Executive Assistant to the Provost/Executive Vice President
- Executive Director for Colorado Opportunity Program/TRIO
- Executive Director for External Affairs
- Executive Support and Grants Manager, Provost's Office
- External Degree Advisor Extended Studies
- Faculty Senate President
- Faculty: 18 professors; 11 associate professors; 5 assistant professors
- Field Experience Coordinator, Teacher Education
- Financial Aid Counselor
- Financial Aid Counselor
- Financial Aid Operations Specialist
- Financial Aid Operations Specialist
- First Year Advisor, Center for Academic Enrichment
- First Year Advisor, Center for Academic Enrichment
- Healthcare Technician I
- Human Resources Associate
- Human Resources Specialist
- Information Technology Supervisor
- Information Technology Supervisor
- Instructional Technologist
- Interim Associate Dean of Nursing
- Interim Director, Admissions
- International Recruitment Specialist
- Manager Networking and Server Systems
- MBA Director, Special Assistant to the Dean
- Office Manager I, Student Services & Enrollment Management
- Office Manager, Center for Academic Enrichment
- Program Assistant I, Center for Academic Enrichment
- Program Coordinator, Extended Studies
- Program Coordinator, TRIO
- Provost/Executive Vice President for Academic Affairs
- Registrar

- Student Engagement and Leadership Intern (2)
- Students: 17 undergrad; 3 graduate
- Undergraduate Academic Advisor, Hasan School of Business
- Vice President - Enrollment Management & Student Affairs
- Vice President - Finance and Administration
- Writing Room & General Education Tutor Coordinator, Center for Academic Enrichment

Additional Documents

- CSU-Pueblo Student Survey
- Concern to HLC - CSU-Pueblo AAUP February 8, 2017
- Complaint to HLC - Tim McGettigan: emails dated January 26 and January 29, 2017
- Complaint to HLC - Tim McGettigan: US District Court for the District of Colorado conclusion
- Complaint to HLC - Tim McGettigan: CSU-Pueblo Financial Audit 30 June 2014
- Program Reviews: Shared Google Folder
- Assessment Reports: Shared Google Folder
- Assessment Feedback Files 2015-2016 Shared Google Folder
- Institutional Effectiveness meeting notes - 06-21-2016; 08-02-2016; 09-06-2016; 10-31-2016; 11-14-2016
- Alumni Surveys on IR website: <https://www.csupueblo.edu/institutional-research/surveys/index.html>
- Budgets - FY15, 16, and 17. <https://www.csupueblo.edu/vice-president-of-finance-and-administration/budget-central/index.html>
- Colorado State University Board of Governors Meeting Minutes: <http://www.csusystem.edu/board-of-governors/meetings-agendas/board-retreat-and-meeting>
- CSU-Pueblo Organizational Chart 2017
- CSU-Pueblo Electronic Communications Policy (archived; dated May 05, 2010)
- CSU-Pueblo Report of Independent Certified Public Accountants with respect to Accounts Receivable and the Related Allowance for Uncollectible Accounts (December 31, 2011)
- Colorado State University System: Report of the Internal Auditing Department, Report No. 12-04. Audit of the University's Accounts Receivable, Colorado State University-Pueblo. (October 14, 2011)
- President Di Mare's e-mail correspondence to Faculty Senate, AAUP, and UBB representatives, "Faculty recommendations for Budget Restructure" (dated January 8, 2014)
- Friends of Football Least Contract (Signed 18 June 2008)\
- Athletics Football Stadium Payment email (K Spiecker to Rick Kreminski, 25 April 2017)

1 - Mission

The institution's mission is clear and articulated publicly; it guides the institution's operations.

1.A - Core Component 1.A

The institution's mission is broadly understood within the institution and guides its operations.

1. The mission statement is developed through a process suited to the nature and culture of the institution and is adopted by the governing board.
2. The institution's academic programs, student support services, and enrollment profile are consistent with its stated mission.
3. The institution's planning and budgeting priorities align with and support the mission. (This sub-component may be addressed by reference to the response to Criterion 5.C.1.)

Rating

Met

Evidence

As a public institution, Colorado State University-Pueblo has a statutory mission to function as a regional, comprehensive university with moderately selective admissions standards, offering baccalaureate programs with a strong professional focus in the liberal arts, professional, and a limited number of graduate programs. The institutional mission, developed in 2005 through a process involving campus and community input, embraces the regional comprehensive status while articulating the university's commitments to excellence in teaching, research, and service and to diversity. The 2015 mission reaffirmation processes engaged campus constituents in conversation during a convocations processes as evidenced from a copy of the agenda and discussions with campus constituents at various levels.

CSU-Pueblo serves a rural region in southeast Colorado, with approximately 43% of its students coming from Pueblo County. The institution's academic programs are appropriate for enhancing the business, health-care, social-services, etc. needs of their region. The institution's catalog reveals a strong commitment to providing educational access to degrees and programs that are appropriate for the institution and aligned with its mission (including nursing, sociology, business, environmental science), and scholarly efforts that include an Institution of Cannabis Research and a grants office to support faculty efforts. Given that many of their students are first-generation, economically-limited, and/or enter with under-average academic strengths, the institution has deliberately provided significant support services in a time- and location-friendly manner to help students succeed, including the Center for Academic Enrichment, STEM Learning Center, TRIO Grant funded programs, Counseling Center, and Student Health Services. Approximately one-third of the undergraduate student population is self-identified as Hispanic, qualifying the university to identify as an "Hispanic Serving Institution," while nearly 50% are self-identified from under served populations.

CSU-Pueblo's mission specifically articulates its role in providing leadership and access for its region while maintaining its commitment to diversity.

CSU-Pueblo utilizes their mission in the budgeting analysis process, as discussed in 5.c1. A University Budget Board (UBB) is comprised of representatives from all staff classifications, students, and administration (non-voting members). The UBB provides open meetings with minutes posted on an internal drive, serves as a conduit for budget communication, and provides input into the budgetary processes. All unit requests for additional budget consideration must be tied to the mission, according to members on the UBB.

A review of print and web-based materials revealed a mission-aligned focus on serving USC-Pueblo's constituents. Conversations with students, faculty, staff & administration, and the governing board provided additional evidence that CSU-Pueblo's mission does guide the institution's operations.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

1.B - Core Component 1.B

The mission is articulated publicly.

1. The institution clearly articulates its mission through one or more public documents, such as statements of purpose, vision, values, goals, plans, or institutional priorities.
2. The mission document or documents are current and explain the extent of the institution's emphasis on the various aspects of its mission, such as instruction, scholarship, research, application of research, creative works, clinical service, public service, economic development, and religious or cultural purpose.
3. The mission document or documents identify the nature, scope, and intended constituents of the higher education programs and services the institution provides.

Rating

Met

Evidence

CSU-Pueblo clearly presents their mission and vision through print and web-based resources. The institution has evolved from its early two-year mission into a comprehensive regional university, articulating a vision-mission that is aligned with the Board of Governor's Mission for the institution and is appropriate for a regional comprehensive institution serving the southeastern Colorado region. The university's mission and vision statements are clearly articulated through various public channels including the university website, the student organization handbook, the strategic plan, and the university catalog.

The university's mission informed the update of their strategic plan in 2015. The strategic plan outlines four main goals developed specific to the university's overall mission: excellent academics, affordable education, transformational opportunities, and supportive student life. The mission and vision documents in print and web resources are current and detailed, clearly articulating the constituency it serves, what degree opportunities it offers and its values of excellence, affordability, transformative, and student-supportive goals. The vision also states that the integrative learning of liberal arts and sciences with professional preparation and its experiential education focus are distinguishing characteristics of CSU-Pueblo. A presented set of nine values align with the mission of CSU-Pueblo and the tenets of a liberal arts-based comprehensive public institution.

CSU-Pueblo is a regional institution with a strong focus on the residents of southern Colorado. Within this region the commitment to serve culturally diverse and first-generation students is articulated. As a comprehensive institution, CSU-Pueblo provides undergraduate and select graduate programs through its residential campus, at distant sites (including Fort Carson and Colorado Springs and regional high schools) and through online and correspondence modality. It is clear that CSU-Pueblo focuses on the region it is assigned to serve, as evidenced in print and web resources, academic programs, student services, and conversations with the student body and other campus constituents.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

1.C - Core Component 1.C

The institution understands the relationship between its mission and the diversity of society.

1. The institution addresses its role in a multicultural society.
2. The institution's processes and activities reflect attention to human diversity as appropriate within its mission and for the constituencies it serves.

Rating

Met

Evidence

CSU-Pueblo recognizes its role in serving a diverse population within its region. The university is identified as an Hispanic Serving Institution, with approximately one-third of its undergraduates self-identifying as Hispanic and approximately 46% of undergraduate FTEs self-identified as from underrepresented populations. The institution is located in an area with high diversity, in racial and ethnic background and in socioeconomic capacity. The institution broadens its focus on diversity to also include gender, non-traditional, college preparation, sexual orientation, nationality, differential ability, and veterans. The international program with 130 international students from 38 countries adds to the residential campus student body diversity.

The institution's support for diverse students reflect their attention to human diversity and their commitment to student success. The university offers a variety of student services designed to support a diverse ethnic student body, including the Office of Diversity and Inclusion, the Black Student Union and the Latin Students Unidos. In addition, the university offers a variety of student services designed to support a variety of diverse others beyond ethnicity; the Center for Academic Enrichment (provides advising and tutoring services) and the Disabilities Resource and Support Center (serves students with mental and physical challenges). A Center for International Programs recruits international students to campus and provides support for their success, in an effort to further increase student diversity at CSU-Pueblo.

CSU-Pueblo serves a diverse population and has the opportunity to become a model in facilitating difficult conversations, developing leaders in recognizing the value of diverse views and ideas, and framing the regional and national conversations on diversity in higher education and beyond. The campus personnel do not currently mirror the diversity of CSU-Pueblo's student body, which may be an area the administration might want to review. Given their uniquely diverse constituency, the institution is encouraged to deliberate on what it means to be a Minority Serving Institution, how to more fully embrace the spirit of being an Hispanic Serving Institution, and what practices or processes would model that designation for other institutions who seek to learn how to effectively support campus diversity.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

1.D - Core Component 1.D

The institution's mission demonstrates commitment to the public good.

1. Actions and decisions reflect an understanding that in its educational role the institution serves the public, not solely the institution, and thus entails a public obligation.
2. The institution's educational responsibilities take primacy over other purposes, such as generating financial returns for investors, contributing to a related or parent organization, or supporting external interests.
3. The institution engages with its identified external constituencies and communities of interest and responds to their needs as its mission and capacity allow.

Rating

Met

Evidence

As a not-for-profit state institution, the university operates under the oversight of the Colorado Legislature, the Colorado Department of Higher Education, and the CSU System Board of Governors. CSU-Pueblo's primary purpose is to serve as a regional comprehensive university in teaching, research and service by providing leadership and access for its region while maintaining its commitment to diversity. A review of the budgets indicate that the allocation of resources aligns with the institution's responsibilities.

The public funding behind CSU-Pueblo, and the State of Colorado's expectation for its public institutions, ensures that the educational mission of the institution is the core focus. The mission and the vision of the institution support that educating students and serving the educational needs of the region are foundational to the institution. The Strategic Plan subtitle reflects the understanding of the institution in serving the greater good, "Ensuring Student Success: Preparing Students to be Educated, Ethical, Responsible, and Engaged Citizens." This theme embraces the liberal arts foundations of regional public institutions. The Strategic Plan Goals and Objectives support this core focus.

CSU-Pueblo is engaged in meeting the needs of its external constituencies and communities as evidenced by several items. The Latino Advisory Council works with the President to provide additional insight into that community's unique needs and the institution's interactions with the community and its students. The Title V Grant that funded the Community Based Research provided significant interactions between the campus and its community, engaging students in real and experiential learning while meeting the needs of the community. Unfortunately, at the end of the federal funding this particular initiative was discontinued, although the faculty learning and commitment remain. The Institute of Cannabis Research coordinates broad research into Cannabis issues and opportunities, including biological, sociological, legal, economic, and alternative product aspects. The institution's focus on experiential education has led to increased service learning and volunteering, strengthening the campus-community connections. Evidence supports the role of the University in fulfilling educational, research, and service for the southeastern Colorado region.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

1.S - Criterion 1 - Summary

The institution's mission is clear and articulated publicly; it guides the institution's operations.

Evidence

The evidence supports that CSU-Pueblo fully meets Criterion I.

CSU-Pueblo has clearly outlined mission and vision statements that reveal a focus on civic responsibility, diversity, and innovation. The university articulates actions and strategies to fulfill its mission through its strategic plan and other operation actions. While processes are in place and people are committed to aligning budgetary allocations with the institution's mission and values, the reality of the current financial situation provides minimal budgetary flexibility for the institution. A new financial management system, implemented in 2014, provides clearer information on the financial status of the institution.

Conversations with campus constituents reveal a broad and significant commitment to serving their students. The designation as an Hispanic Serving Institution is recognized as a unique characteristic through which the institution can distinguish itself from other, similar regional comprehensive institutions. As CSU-Pueblo moves forward with a new President and opportunities for growth, the campus is encouraged to embrace the opportunity to further articulate the distinguishing features and responsibilities of the Hispanic Service Institution designation, the potential of becoming a Minority Serving Institution, and how these designations are reflected in and supported by the campus culture and environment.

2 - Integrity: Ethical and Responsible Conduct

The institution acts with integrity; its conduct is ethical and responsible.

2.A - Core Component 2.A

The institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows policies and processes for fair and ethical behavior on the part of its governing board, administration, faculty, and staff.

Rating

Met With Concerns

Evidence

CSU-Pueblo exhibits a commitment to ethical and responsible actions in all university functions. Documentation of expectations are found at the Board and University level, through policy, personnel handbooks, and other publications. Annual conflict of interest forms are submitted to the institution by all faculty and staff. The conflict of interest forms are sent to faculty and staff in an e-mail reminder with links to a description and examples of what constitutes a conflict of interest. Conflict of interest information is also found in the State of Colorado Employee Handbook and the Faculty Handbook.

A representative of Human Resources provides training to all search committees on conducting a consistent and thorough search for new employees. The Director of Equal Opportunity and Affirmative Action is a separate office that provides a charge to the search committees to conduct a fair search free of discrimination. FERPA training and training on workplace issues are provided on a regular basis.

The Office of Diversity and Inclusion provides additional support for this core component. Given that CSU-Pueblo is an Hispanic Serving Institution and that student enrollment is nearly 50% ethnically diverse, all campus personnel are expected to serve their students in a culturally competent manner. Training on serving diverse students is provided by the Office of Diversity and Inclusion on a regular basis.

The Faculty Senate Academic Programs and Standards Board and the Curriculum and Academic Programs Board provide oversight for academic program integrity. Standards for academic integrity, including research, are outlined in publications relevant to faculty and students. These publications are available in print form and online.

Students are made aware of expectations for ethical behavior through the college catalog, the student handbook (Pack Guide), the student athlete handbook (Pack Athletics), and online on various student pages. Expectations are expressed as part of orientation and included on most syllabi. Policies on academic honesty are vigorously followed. The CSU-Pueblo philosophy on academic dishonesty is to

address it in an educational manner, using discipline as a last resort. Student athletes are held to rigorous integrity academically, athletically, and in their conduct as defined in the CSU Pueblo Student Athlete Handbook.

The university also demonstrates its commitment to integrity in the timely way it deals with complaints and grievances. A clearly defined grievance policy is found in the *Faculty Handbook*, with a standing committee appointed to address with grievance matters, complete with timelines and guidelines. Students provide input on policy and process changes through the newly created Residence Life student council. The Dean of Student Affairs is the coordinator for complaint processing. However, several campus constituents conduct investigations and have been trained to do so. In spring 2014, CSU-Pueblo developed a matrix to summarize and track complaints and concerns within student affairs. A formal campus-wide policy regarding student complaints was adopted on December 6, 2016. These will allow the institution to ensure that complaints are addressed in a timely manner and to find trends and patterns for improvement, although no trend data has yet been accumulated due to the recent adoption of the policy.

The University Budget Board (UBB) represents the entire university (faculty, students, classified and administrative staff), yielding broad, university-wide constituency and outlook and providing a communication conduit for financial transparency. Campus constituents feel they are fairly represented by the UBB. With the implementation of new financial software, campus constituents indicate the ease at which they can access current and accurate budget information for their respective departments. The university has experienced significant financial challenges resulting in heightened scrutiny of vacant positions, reduced operating budgets and few salary increases. However, the majority of campus constituents perceive the budget processes to be transparent, fair and equitable.

The university is given financial directives from the state of Colorado, the CSU System Board of Governors and the US Department of Education regarding its financial practices. The University does not have a stand-alone audit, but is audited as a part of the CSU System annual audit.

CSU-Pueblo has implemented substantial processes for transparency of operations during President Di Mare's tenure. During the self-investigation required for writing the Assurance Argument, areas for improvement were found, including mechanisms to use complaints for self-reflection, the expanding constituency and functioning of the University Budget Board, and the open sharing of budget priorities and challenges. Implementation of a new financial system in July 2014 has provided significant improvement in tracking budgets. The Visiting Team has a continuing concern regarding financial oversight, as evidenced in the recurring audit material weaknesses involving Title IV findings and the financial capacity and sustainability of the CSU-Pueblo as evidenced in the CFI components.

Interim Monitoring (if applicable)

Concern 1. Recent changes have been implemented to ensure that student complaints are tracked, addressed, and then assessed to determine institutional improvements. However, the recent implementation of these changes has not yet allowed for a pattern of evidence to be collected, assessed, and used for improvement.

RECOMMENDED MONITORING: Embedded monitoring within the Year 4 Comprehensive Evaluation, focusing on student complaint policy, processes, and assessment; Due Spring 2021.
Please include within your Standard Pathway four-year comprehensive visit assurance argument evidence to support an area of focus review regarding the Federal Compliance Review and Core

Component 2A concern regarding 'closing the loop' in student concern assessment. The review should (1) identify the processes and procedures in place in 2021 for documenting student complaints, and which offices are involved in receiving formal complaints and informal concerns; (2) summarize processes, procedures, and complaints assessment that has occurred since the 2017 campus visit and who are involved in those discussions; and (3) track the findings and subsequent changes made to improve communications, processes/procedures, and/or policy as a result of the student complaint/concern assessment of data.

Concern 2. Recent changes in oversight and reporting for Title IV funds have occurred due to analysis of material weaknesses and reporting difficulties. The recent implementation of these changes has not yet allowed for a pattern of evidence to be collected, assessed, and used for improvement.

RECOMMENDED MONITORING: Embedded monitoring within the Year 4 Comprehensive Evaluation, focusing on Title IV Federal Aid Processes & Procedures; Due Spring 2021. This report should identify (1) the processes and procedures implemented in FY 2017; (2) the effectiveness of these processes in addressing and ameliorating the audited material weaknesses in this area; (3) a summary of the way that data is collected, analyzed, and used to make improvements, and who is involved in those discussions; and (4) a tracking of changes made to improve communications, processes/procedures, and/or policy as a result of the assessment of data.

2.B - Core Component 2.B

The institution presents itself clearly and completely to its students and to the public with regard to its programs, requirements, faculty and staff, costs to students, control, and accreditation relationships.

Rating

Met

Evidence

Preparation for the HLC site visit provided an opportunity for CSU-Pueblo to review all documents and publications. Although most documents and publications are updated on a regular basis, this process resulted in CSU-Pueblo updating some lesser-used policies/procedures and in other cases, developing new policies and procedures. For example, CSU-Pueblo recently developed a chair's manual. This manual includes the previously unwritten aspects of being a department chair. The formation of a Policy library was also implemented; with policy and procedures available through an internal webdrive.

Academic programs and requirements are shared with the public via the institution's website which houses the catalog, academic planner, student handbook, student Pack Guide, Code of Conduct, student athletic handbook, etc. Colorado has developed statewide transfer articulation agreements which detail degree pathways for transfer students. In addition, institutional transfer guides are available for each baccalaureate degree program. Transfer and articulation guides are available on the website, as are the Clery Report, cost of attendance, and differential tuition. An accreditation webpage discloses current accreditation standings with HLC and program accreditations (social work, business, teacher education, etc.). A review of the website showed a user-friendly layout and effective search function providing access to internal and external constituents. Most individual department pages include a frequently asked questions section which students and staff indicate is extremely helpful.

Faculty Senate minutes and University Budget Board meeting minutes are posted to an internal drive, while policies and procedures and budget information are available on the institution's website. The University Budget Board meetings are open to the public as are the CSU Board of Governors meetings. The Budget Central website provides information regarding 2014-15 budget cuts and some 2015-2016 budget information. No new information appears to have been posted for the current year.

Individual programs approved by or aligned with specialized accreditation agencies include: athletic training, the Commission on Accreditation of Athletic Training Education (CAATE); business, Association to Advance Collegiate Schools of Business (AACSB) International; chemistry, the American Chemical Society; civil, electronics, and mechanical engineering technology, the Technology Accreditation Commission of the Accreditation Board for Engineering and Technology (ABET); industrial engineering and engineering (mechatronics), the Engineering Accreditation Commission of ABET; education, the Colorado State Board of Education and the Teacher Education Accreditation Council; music, the National Association of the Schools of Music; nursing, the Accreditation Commission for Education in Nursing (ACEN); and social work, the Council of Social Work Education.

The cost of attendance is presented online, in print, and at orientation. Tuition charts indicate tuition and fees per credit as well as differential tuition rates for specified programs. Separate tuition charts are available for in-state and out-of-state students. Overall cost of attendance including housing and fees is provided by the financial aid office.

Open communication is demonstrated and encouraged at convocation and other meetings that are held to discuss the budget and academic endeavors. Each semester the president meets with multiple constituencies in an open forum. Appropriate administrators serve as non-voting members on the University Budget Board (UBB) and other committees. The Guidelines and Procedures document indicates substantial input from campus constituents on budget decisions. Participation through representation on the UBB in the budget decisions was verified by various campus constituents and access to information through the email digest and the internal web drive were accessible and appropriate.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

2.C - Core Component 2.C

The governing board of the institution is sufficiently autonomous to make decisions in the best interest of the institution and to assure its integrity.

1. The governing board's deliberations reflect priorities to preserve and enhance the institution.
2. The governing board reviews and considers the reasonable and relevant interests of the institution's internal and external constituencies during its decision-making deliberations.
3. The governing board preserves its independence from undue influence on the part of donors, elected officials, ownership interests or other external parties when such influence would not be in the best interest of the institution.
4. The governing board delegates day-to-day management of the institution to the administration and expects the faculty to oversee academic matters.

Rating

Met

Evidence

The Board of Governors for the Colorado State University System oversees three campuses: Colorado State University-Fort Collins, Colorado State University-Pueblo, and Colorado State University-Global Campus, and their constituent agencies, institutes, and services. The Governing Board composition includes nine voting members appointed by the Governor of Colorado and confirmed by the Colorado Senate. Six non-voting members – a faculty member and a student from each campus – bring campus perspectives to the Board discussions. A review of fall 2016 minutes indicates that the Board is concerned with and informed of campus issues and opportunities, and that they consider these in the context of the institution's unique mission.

Campus constituents indicated a mostly positive perception and relationship with the Board. Board members attend commencement ceremonies and other significant events as appropriate or invited. Some constituents did express a concern that they felt sometimes the full board did not fully understand the unique mission of the institution and the unique needs of the student body at CSU-Pueblo. However, they feel represented by Pueblo community members who serve on the board and felt that the other board members make efforts to learn more about the campus and community when on campus by interacting with students, faculty, and staff.

The Board reviews and considers reasonable and relevant interests of CSU-Pueblo constituents during its decision-making deliberations. Board minutes reflect discussions on issues and concerns brought forth by constituents. Supplemental documentation is also kept and recorded with the minutes. Board meeting minutes can be obtained through the Board website.

The Board of Governors Policy and Procedures Manual (Policy 100) and other pertinent board policies articulate the expectation that governing board officials will serve as independent members without undue influence of or benefit from their position. Board Policies clearly articulate the delegation of responsibility to the Chancellor and to the President, while adopting a Faculty

Handbook that articulates the role of the faculty in academic matters.

CSU-Pueblo has been the recipient of generous support and donations from regional constituents and from alumni. One visible evidence of this support is the Neta and Eddie DeRose football stadium, funded by "Friends of Football." The institution and the donor corporation share in upkeep and maintenance of this facility. The substantial impact of this facility is recognized for recruitment and retention of students as well as regional outreach and community engagement. The financial sharing for maintenance and upkeep of these facilities will need to be managed appropriately to ensure that the System and Institution have the primary responsibility for determining budgetary expenditures that are aligned with their financial capacity and priorities.

Dr. Tony Frank serves as both Chancellor for the Colorado State University System and President of the CSU-Fort Collins campus. Dr. Frank has previously served as acting and interim president for CSU-Pueblo for four months. Conversations with campus constituents and with the Chancellor indicate a clear understanding of the mission of CSU-Pueblo, and a decided commitment to supporting and strengthening the institution. Dr. Frank appears to manage this dual role well, articulating a clear commitment to strengthening CSU-Pueblo. No real or perceived conflict of interest was indicated during campus conversations regarding the current chancellor, the campus constituents, or the Board. Given the potential for conflicting priorities in this dual role for the System Chancellor, the Board is encouraged to carefully consider how this unique dual role can continue to be effective if Dr. Frank were not the specific individual in this position.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

2.D - Core Component 2.D

The institution is committed to freedom of expression and the pursuit of truth in teaching and learning.

Rating

Met

Evidence

CSU-Pueblo has Board and Institutional policies in place that support freedom of expression and the pursuit of truth in teaching and learning. Documents of evidence include but are not limited to:

- CSU System Board Policies and Procedures: Policy 311 Academic Freedom Policy
- CSU-Pueblo website: Faculty Senate, Academic Freedom and Tenure
- CSU-Pueblo Faculty Handbook (accessed via web; 1.1.1.2 Article II – Purpose)
- CSU-Pueblo Catalog, 2016-2017

The campus recognizes the value of discussion from diverse viewpoints. Diversity Dialogues are held every month in various formats such as TED-type talks. Recent dialogues included topics related to the national election and implications, particularly for International and undocumented students. The Office of Diversity and Inclusion organizes a monthly cultural competency training for faculty, staff, and students. The Re-thinking Diversity series invites faculty or staff to present various topics throughout the semester on contemporary issues related to diversity in their perspective fields. The focus of the series is on the significance and impact of diversity or multiculturalism in the global arena.

Students indicated they feel free to express themselves both in and out of the classroom. The Pack Guide includes the campus peaceful assembly policy, although demonstrations and protests are not typically a part of campus culture. Students are comfortable approaching administrators and staff (up to and including the president and vice-presidents) with their concerns. Furthermore, their experience is that they feel heard and that their concerns are taken seriously. Students reported that in the classroom they are encouraged to offer points of view that may differ from the faculty as well as from their fellow students. Faculty encourage students to engage in civil, yet challenging discussions.

Academic freedom is essential to teaching and research at CSU-Pueblo. Academic freedom is embraced by the university as stated in the faculty handbook. Faculty are encouraged to engage in scholarship and funds are available to support research through the Office of Research and Sponsored Programs.

The current Email and Electronic Mass Communication Policy was developed and implemented in response to faculty, staff, and students being inundated with email on a daily basis; a prior policy had existed but as email usage increased the policy was found to be ineffective. Prior to the implementation of the policy, individuals could email the entire CSU Pueblo community, including alumni, with no restrictions. While initially perceived by some as restrictive, the 2014-2015 policy is seen by most as essential in monitoring official messages and reducing junk email. Campus

constituents indicate communications have improved because they do not need to sift through interspersed important university business and junk mail. This relates to the formal complaint below.

RESPONSE TO FORMAL COMPLAINT AND SUBMITTED CONCERN LETTER:

The Higher Learning Commission received a formal complaint regarding CSU-Pueblo on 26 January 2017. The Visiting Team conducted additional focus group sessions with core campus constituents to ensure that broad perspectives were sought and considered regarding the issues presented within the complaint.

- The Visit Team failed to find evidence to support the allegation that the Board of Governors and the Chancellor were shifting CSU-Pueblo's financial and personnel resources from supporting their mission as a regional comprehensive university to support a new system campus in an urban area (Criterion 1 concern). Indeed, evidence was found where the System provided additional resources from the System to the institution to meet financial obligations for residence hall bond payments and for athletic stadium turf replacement, both essential facilities for recruitment and retention of students.
- Conversations with multiple campus constituents regarding shared governance are presented in Criterion 2, and do not support the complainant's concerns. Faculty provide input through the Faculty Senate, the University Budget Board, scheduled open convocation forums, serving on the Board of Governors, etc. During the 2014 budget challenge, the local AAUP faculty group was also solicited for input into budgetary recommendations.
- The complainant alleges violation of his freedom of expression. Conversations with multiple constituents at many levels, including two different faculty focus groups and two individual faculty meetings, failed to uncover a systemic or pervasive suppression of free speech at CSU-Pueblo. During multiple sessions the team evidenced expression of difference of opinions in clear yet respectful and civil communication, between peers and between faculty and administration. The email policy implemented in 2014-2015 does prohibit an individual from sending large mass emails, although individuals can still email groups and individuals using the campus email system.
- The complainant's concerns that 2013-2014 financial shortfalls were "a financial farce" can be interpreted to mean that he believed the budget challenges to be a sham or that he believed the financial challenges to be an embarrassment. The evidence is that the financial shortfalls were real, given the financial documentation. His allegation of lack of financial oversight may have some validity; the financial system the institution was using produced reports that were inconsistent and not reliable, according to conversations with upper administration and the Board. A new accounting and reporting system was implemented on July 1, 2014, to address these concerns. However, decisions regarding long-term financial obligations for the institution had been made based upon the prior financial system. Please see Criterion 5 for a broader view of the financial concerns facing CSU-Pueblo. In light of the campus financial constraints in AY2014, many faculty sabbaticals for AY 2015 were postponed for one year if the sabbaticals were for one-semester and caused the institution to incur actual replacement costs (11 sabbaticals were postponed by one year), according to an October 10 2016 email from Dr. Rick Kreminski to Dr. Lesley Di Mare. The standard teaching load at CSU-Pueblo is a 12 credit load fall semester and spring semester, but individuals can negotiate with their supervisor a reduction in that teaching load if they have increased scholarship or service activities. For AY2015, these negotiated teaching reductions were set aside to reduce overall instructional expenses as the campus dealt with a budget shortfall. The evidence indicates that the budget shortfall was real, multiple constituencies were involved in submitting both short- and long-term solutions, and the implemented short-term solutions were budget-driven.

An additionally-submitted letter of concern across multiple criteria was also considered as the Visiting Team sought evidence of CSU-Pueblo's meeting of the Core Criteria. The insight from the author's perspective forwarded one view of how the institution is fulfilling its obligations. Conversations with the individual and with broader constituency provided additional insight into CSU-Pueblo, its challenges, and its opportunities, which were useful in the Visit Team's review. The views expressed in the letter of concern, and in the above complaint, were not widely-shared by other faculty or staff, and no substantive evidence was discovered which would indicate that CSU-Pueblo is not striving to act in the broader public good and in good faith within its fiscal constraints.

The investigation of the formal complaint opportuned the Visiting Team to broaden our acquisition of campus insight and knowledge, providing additional supporting evidence for the institution's assurance argument. The Visit Team's review of evidence and conversations with individuals and large groups failed to find evidence to substantiate the formal complaint submitted to the Higher Learning Commission regarding CSU-Pueblo.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

2.E - Core Component 2.E

The institution's policies and procedures call for responsible acquisition, discovery and application of knowledge by its faculty, students and staff.

1. The institution provides effective oversight and support services to ensure the integrity of research and scholarly practice conducted by its faculty, staff, and students.
2. Students are offered guidance in the ethical use of information resources.
3. The institution has and enforces policies on academic honesty and integrity.

Rating

Met

Evidence

CSU-Pueblo's Office for Research and Sponsored Programs (ORSP) provides a website with information regarding ethical use of human or animal participants in research as well as biosafety information. The office has also developed a detailed and clear Principal Investigator's Manual (2012) that provides guidance and clear articulation of the responsibilities for the grant principal investigator. A local Policy on Scientific Misconduct articulates who processes complaints regarding research misconduct and how those complaints are considered.

Three institutional committees function separately with both on-campus faculty members and external members of the community appropriate to the various areas: the Human Subjects Institutional Review Board (IRB); the Institutional Animal Care and Use Committee (IACUC); and the Institutional Biosafety Committee. No faculty member can commence research until they have received the appropriate approvals. The website provides clear guidance and direction on rules and regulations as well as routing procedures.

In departments, specifically science departments, where research is common and expected, students are regularly provided instruction on ethical research guidelines appropriate to the discipline and the type of research projects conducted. The policies and procedures included in the Policy on Scientific Misconduct apply to all members of the CSU-Pueblo community engaged in research including faculty, staff, and students. The designated research integrity officer for this policy is the Provost and Vice President for Academic Affairs.

The library is an important source of guidance for students in the ethical use of information resources. Students are offered relevant instruction by library staff. In addition, library staff are available for extended hours in person and online. The faculty handbook indicates a directive for faculty to include a statement regarding academic dishonesty. A sample statement is provided in the syllabus template, however, faculty have the option to use their own, or a department or college statement. A review of syllabi show faculty compliance as generally although not fully evidenced by the inclusion of various statements.

Extended Studies employs specific processes to ensure that academic honesty and integrity are maintained throughout all the different modalities by which courses are offered. CSU-Pueblo offers

courses via paper-based correspondence, online offerings, and dual enrollment. All syllabi (whether for on-campus, correspondence, dual-enrollment, or on-line) are expected to include the academic integrity policy as defined in the catalog. A review of the syllabi indicates that this expectation is inconsistently met.

The student Code of Conduct includes a description of various forms of academic dishonesty. The underlying philosophy for addressing misconduct, including academic dishonesty, is education. Academic concerns are addressed with faculty first, progressing further only if necessary.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

2.S - Criterion 2 - Summary

The institution acts with integrity; its conduct is ethical and responsible.

Evidence

The evidence supports that CSU-Pueblo fulfills its responsibility in meeting nearly all of Criterion 2. Newly enacted processes and institutional policies have not been in place long enough for a pattern of evidence to fully support Core Component 2A, however.

The evidence does support that CSU-Pueblo operates with integrity in its academic, personnel, and auxiliary functions. Policies and procedures are in place regarding fair and ethical behavior for the Board of Governors, the administration, faculty, and students. Most policies are readily available both online and in print form. Evidence suggests the policies are utilized and followed in a fair manner. Academic integrity is embraced and ensured as evidenced by stringent policies and procedures in all manners of research, grading, and educational outcomes. Academic freedom and freedom of speech are supported both in and out of the classroom.

The institution has made positive strides in the providing transparency and utilizing shared governance in their financial decision making. CSU-Pueblo has initiated processes for transparency of operations during President Di Mare's tenure. However, the Visiting Team has a concern regarding the lack of time to assess the impact of new Title IV funding reporting processes and procedures, to develop a pattern of evidence of responsiveness and improvement following implementation of new processes and procedures. In addition, the processes and policies regarding tracking student complaints, to ensure appropriate resolution and to improve communications and processes has recently been developed and no pattern of continual improvement has been developed yet. Areas of focus for the recommended Standard Pathway year four comprehensive visit are recommended, to meet the concerns identified in Core Component 2A.

Core Component 2A is Met with Concerns.

3 - Teaching and Learning: Quality, Resources, and Support

The institution provides high quality education, wherever and however its offerings are delivered.

3.A - Core Component 3.A

The institution's degree programs are appropriate to higher education.

1. Courses and programs are current and require levels of performance by students appropriate to the degree or certificate awarded.
2. The institution articulates and differentiates learning goals for undergraduate, graduate, post-baccalaureate, post-graduate, and certificate programs.
3. The institution's program quality and learning goals are consistent across all modes of delivery and all locations (on the main campus, at additional locations, by distance delivery, as dual credit, through contractual or consortial arrangements, or any other modality).

Rating

Met With Concerns

Evidence

Review of the university's strategic plan indicates that the University has a commitment to providing high quality and relevant academic programs with a focus on assessment of student learning to inform decision making. The university impanels a Curriculum and Academic Programs Board that works in conjunction with the Faculty Senate to ensure consistent and relevant course offerings. A review of the Guideline for Academic Program Self-Study and discussions with faculty, the Institutional Effectiveness Committee, and the Assistant Provost for Assessment, Student Learning, and Effectiveness showed that many programs across the university are reviewed by external accrediting agencies and all are reviewed for quality on a five to seven year cycle by the university's Curriculum and Academic Programs Board. Standard 3 in the program review self-study asks the department to respond to the statement that "The program provides and evaluates a high quality curriculum that emphasizes student learning as its primary purpose." Discussions with program faculty and administrators showed that many programs use the assistance of advisory panels to help guide decision making regarding program quality and currency.

Syllabi review did not clearly articulate how the individual courses within the degree plan align and layer sequentially to result in the expected program learning outcomes. Indeed, inconsistent presentation of learning expectations within a single course across multiple instructors and multiple modalities would seem to indicate that the alignment of courses within a program have not been deliberately considered, and course learning expectations have not been clearly articulated within the program framework. The program assessment reviews indicate that the students are learning, and the programs are current, although the syllabi fail to provide evidence that the program learning expectations have been deliberately aligned to result in these outcomes.

A review of the university's assessment web page shows that programs monitor course learning outcomes on an annual basis and programs across campus have access to a common syllabus template that requires the presentation of course-level student learning outcomes. Courses taught through the university's division of extended studies have syllabi approved by a home department and reviewed by the department every three years.

Outcomes are monitored by the Curriculum and Academic Programs Board and mandated to be present for all courses through use of a syllabus template. Annual assessment results are presented to the university and the public through publication on the university's website. The Catalog clearly states expected program outcomes for undergraduate and graduate degrees. Analysis of seven (7) syllabi representing stacked courses (single courses designed to serve both undergraduate and graduate students at the same time) showed a lack of differentiation in student learning outcomes between undergraduate and graduate students enrolled in the same course, and lack of consistency in articulating the additional effort and assessment for graduate-level learning. Discussion with the Office of Extended Studies, the Assistant Provost for Assessment, Student Learning, and Effectiveness, and various program faculty and administrators revealed limited evidence to indicate that analysis and implementation of stated learning outcome results is performed. As the institution considers offering additional graduate programs, it will be important to clarify what differentiates graduate from undergraduate education.

A review of syllabi for ten courses each with multiple sessions taught by different faculty or through different sessions or modalities indicated no consistency in the use of terms (goals, objectives, and outcomes) or in the articulation of common student learning expectations for the course. Further review indicates inconsistent presentation of evidence on how students are assessed according to the articulated student expectations. Discussion with the Office of Extended Studies, the Assistant Provost for Assessment, Student Learning, and Effectiveness, and various program faculty and administration presented limited evidence to demonstrate that the learning outcomes and assessment were identical regardless of the mode of delivery or that analysis and implementation of stated learning outcomes is performed. Conversations with students and faculty did not provide evidence to support that the general studies program and the discipline majors were aligned to provide a coherent learning experience.

In the period from 2014 to 2016, two accrediting bodies have identified deficiencies or areas requiring close monitoring relating to systematic processes of student learning outcome assessment and the use of evidence to improve both curriculum and learning outcomes. In July 2016 NASM deferred action on the Music program's application for renewal, referring to several items relating to program mission and adequacy of resources. The baccalaureate nursing program has been placed on conditions as of March 2016, and must address non-compliance with regards to faculty qualifications and assessment of learning. Failure to address the conditions will result in a loss of accreditation and subsequent loss of state approval. The repeated citation of concerns regarding systematic assessment of student learning and use of evidence by discipline accrediting bodies warrants monitoring to assure that the Criteria for Accreditation continue to be met.

Interim Monitoring (if applicable)

Concern 3: The pattern of evidence received from a review of 70 course syllabi, the catalog, and

program reviews does not provide consistent evidence that the academic programs are offered in a consistent manner that aligns discipline-articulated course learning outcomes with program learning outcomes, meets federal definition for credit hour allocated to the courses, differentiates learning expectations and assessment between undergraduate and graduate students in stacked courses, or incorporates co-curricular student experience and general studies learning expectations in the overall student assessment for undergraduate (or graduate) learning, skills, and performance. In addition, four of the specialized accrediting programs (AACSB, ACEN - both BSN and Masters), CSWE, and NASM) identified concerns in curriculum alignment, assessment, impact and evaluation, continual improvement, and/or facilities in their most recent reaffirmation reviews. Two of these (AACSB and CSWE) have been remedied, so progress has been made in some areas, although not consistently campus-wide. The Visit Team recommends the following:

RECOMMENDED MONITORING: Interim Monitoring Report --- Program Alignment and Assessment. Due May 31, 2019: This report should address the several areas of concern articulated in the Federal Compliance Review (and areas identified in Core Component 4B), as follows:

- (1) Alignment of expectations for student learning and performance across the required courses within a program's curriculum. The course learning outcomes should evidence the strategic stratification of learning and performance from the entry through the exit level, as indicated in syllabi-articulated learning outcomes and well-defined learning assessment measures that clearly align with program learning outcomes;
 - (2) Consistency in expected student learning and performance outcomes within a course across modalities, instructor, and terms, to ensure that students are receiving equivalent learning in their progression toward their degree (note that the expected learning should be the same, although the method of effecting and assessing that learning can differ from instructor-to-instructor or across modalities). Common understanding of terms such as "goal," "objective," and "outcome" should be evident in syllabi and in the catalog;
 - (3) Articulated syllabi evidence to support credit hour application and communication of expected student effort, as related to the student learning outcomes and assessment measures, with sufficient evidence to support the level of assigned credit for that course, at the assigned class rank;
 - (4) Differentiation of undergraduate/graduate learning expectations within stacked (400-500) courses and how those differentiated outcomes are assessed appropriate to the expected level of learning, understanding, and knowledge integration of these two student levels;
 - (5) Integration of the curricular (discipline and general studies) and co-curricular student experiences to meet the expected student outcomes at the appropriate levels (undergraduate and graduate). At the undergraduate level this would include consideration of the knowledge, skills, and abilities designed to be developed through the general education curriculum and how these articulate with and support program learning outcomes;
 - (6) Progress on addressing deficiencies and conditions cited by specialized accrediting bodies, and current status;
- (NOTE: Report will also include (7) through (10) from as detailed under Core Component 4B.)

3.B - Core Component 3.B

The institution demonstrates that the exercise of intellectual inquiry and the acquisition, application, and integration of broad learning and skills are integral to its educational programs.

1. The general education program is appropriate to the mission, educational offerings, and degree levels of the institution.
2. The institution articulates the purposes, content, and intended learning outcomes of its undergraduate general education requirements. The program of general education is grounded in a philosophy or framework developed by the institution or adopted from an established framework. It imparts broad knowledge and intellectual concepts to students and develops skills and attitudes that the institution believes every college-educated person should possess.
3. Every degree program offered by the institution engages students in collecting, analyzing, and communicating information; in mastering modes of inquiry or creative work; and in developing skills adaptable to changing environments.
4. The education offered by the institution recognizes the human and cultural diversity of the world in which students live and work.
5. The faculty and students contribute to scholarship, creative work, and the discovery of knowledge to the extent appropriate to their programs and the institution's mission.

Rating

Met

Evidence

A review of the academic policy outlining general education requirements, the university's general education assessment web page, and discussions with various faculty and administrators shows that the general education program offered by the university seeks to provide students with the goal to "develop the intellectual and ethical foundations necessary for an understanding of and respect for humanity as well as the knowledge and skills necessary to adapt to the demands of a rapidly changing society." The general education program focuses on two major components - a skills component and a knowledge component. The skills component is designed to provide students with communication and quantitative reasoning skills. The knowledge component is designed to provide students a broad understanding of the arts and humanities, the social sciences, and the natural and physical sciences. The general education program has a focus on diversity and social responsibility, personal ethics and values, and wellness and well-being - all in line with the university's stated mission and values.

The university promotes its general education learning outcomes through a dedicated general education assessment website and through the course catalog. Discussions with various faculty, students, and administrators suggest a limited focus and understanding of the purpose, content, intended learning outcomes, and general connection between the knowledge, skills, and abilities learned through the general education process and the students' major course of study.

Discussions with various faculty and administrators and a review of a sample of 15 course

descriptions found in the university catalog shows that university programs require students to engage in the collection, analysis, and communication of information. Learning outcomes for each program are articulated through the university's course catalog.

The university has a focus on diversity as part of its mission. A review of the general education assessment website and the course catalog shows a focus on diversity and a world view is evidenced through their general education program. In addition to a broad focus on the humanities, the general education program has a required cross-cultural component. Analysis of the general education requirements and through discussion with various faculty and administrators shows that students are required to participate in courses that focus on human behavior, culture, the arts, and literature. Review of the university's website and through discussions with various faculty and administrators and the Director of the Center for Teaching and Learning shows that the university sponsors a variety of activities designed to highlight diversity through the Center for Teaching and Learning, by the hosting of special events, and through visiting guest speakers and other educational opportunities.

The faculty handbook and discussions with various faculty and administrators reveal a faculty responsibility to engage in scholarly and other creative activities. Faculty scholarly and other creative activities are part of the annual performance review for tenure-line faculty and are recognized annually through a Scholar's Reception. A review of the university's website shows that internal grant money is available for faculty engaging in individual research as well as research involving students. Discussion with faculty indicates that while university support for faculty seeking external grants has been reduced, the Center for Teaching and Learning provides training and other support for faculty seeking external grants. Faculty report that the scholarship of teaching and learning is valued at CSU-Pueblo, which aligns with its role as a regional university.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

3.C - Core Component 3.C

The institution has the faculty and staff needed for effective, high-quality programs and student services.

1. The institution has sufficient numbers and continuity of faculty members to carry out both the classroom and the non-classroom roles of faculty, including oversight of the curriculum and expectations for student performance; establishment of academic credentials for instructional staff; involvement in assessment of student learning.
2. All instructors are appropriately qualified, including those in dual credit, contractual, and consortial programs.
3. Instructors are evaluated regularly in accordance with established institutional policies and procedures.
4. The institution has processes and resources for assuring that instructors are current in their disciplines and adept in their teaching roles; it supports their professional development.
5. Instructors are accessible for student inquiry.
6. Staff members providing student support services, such as tutoring, financial aid advising, academic advising, and co-curricular activities, are appropriately qualified, trained, and supported in their professional development.

Rating

Met With Concerns

Evidence

The university has adequate faculty and staff for effective programs and student support services. Review of a university provided data sheet shows that the university employed more than 500 faculty members in 2015 with varying levels of experience. A review of the university web site shows a faculty to student ratio of 1:18 with an average class size of 25. Faculty required credentials are outlined in the university handbook and expectations of obligations are defined in policy statements.

Review of the faculty handbook, Annual Performance Review form, and discussion with the Assistant Provost for Assessment, Student Learning, and Effectiveness showed that all tenure line faculty are required to undergo a yearly performance review through use of the Annual Performance Review (APR) form. Discussion with various faculty and administrators supported that each review is evaluated by department chairs, deans, and the Provost. Adjunct and other temporary faculty are not university-mandated to undergo the yearly APR process. Discussion with various faculty and administrators shows that some programs have their own evaluation process for adjuncts, but there was no evidence of an established institutional policy. A review of a sample of 31 employment contracts showed that all but two of the associated faculty met university mandated minimum credentials. The two exceptions were based on the experience of the person in music and the fact that both were assigned applied teaching responsibility.

The university assures that faculty are current in their discipline through use of the Annual Performance Review process. In addition, discussion with various faculty and administrators shows

that the Provost's office supports professional development through the availability of funds for training and development. Through a tour of the facility and in discussion with the Director for the Center for Teaching and Learning, it was shown that the university has a Center for Teaching and Learning (established through a federal grant which expires in approximately three and one half years) dedicated to faculty development that offers a number of training sessions and other learning opportunities for faculty. The adjunct handbook and discussions with various faculty and administrators indicates that adjuncts and other temporary faculty are not required to undergo a yearly performance review to ensure proper continued training and development.

In consideration of the large percentage of adjunct and other temporary faculty teaching within the institution, it is recommended that the university develop processes and procedures to ensure that all faculty (both tenure line and temporary faculty) are evaluated on a regular basis. Recognizing the diverse use of adjunct faculty in dual-credit, correspondence, online, and residential campus offerings, an articulation of the expected mechanism and level of access for students might also be warranted.

Through examination of the faculty handbook and discussions with various faculty and administrators, it was shown that tenure line faculty are required to be available for students a minimum of five hours each week. Faculty availability for students is posted on course syllabi, on office doors, and through the course management software - Blackboard. In discussion with various faculty, administrators, and students it was shown that instructors are appropriately available to provide assistance to students. The adjunct handbook reveals that adjunct faculty are expected to have 1.5 office hours per week for each 3 credit course, up to the full-time 5 hour requirement.

Discussions with various faculty, administrators, and staff showed that the university employs an adequate number of staff for the effective management of student support services. A review of the university website and through discussions with various faculty and administrators did not uncover a university policy regarding minimum qualifications for student support services staff. Information provided indicates that each student support service entity sets its own standard for minimum staff qualifications for employment. Conversations with student services personnel revealed that they were knowledgeable and current in their understanding of their profession.

Graduate studies lacks a centralized administrative office with resources and support staff. Faculty discussions indicate that prospective students apply to each individual program for institutional acceptance into the graduate program. A common application process for graduate studies does not exist. A Faculty Senate Committee provides institution-wide review of the graduate program, but the faculty indicate no support for recruitment and retention within the program. A review of the Graduate Programs portion of the CSU-Pueblo website provides evidence to support these conversations. CSU-Pueblo has indicated an intent to expand graduate programming in the near future. The Visit Team encourages faculty and administrator conversations regarding how to centralize and support the graduate faculty and graduate programs, including in areas of graduate program visibility; culturing a graduate community; student recruitment, retention and success; program alignment with mission; and program assessment.

Interim Monitoring (if applicable)

Concern 4: CSU-Pueblo utilizes adjunct faculty to augment the full-time campus-based faculty. Currently no formal evaluation of adjuncts occurs. The institution needs to develop and implement a process of assessing all faculty for effectiveness of teaching, currency of knowledge, etc. Annual evaluations also provides the institution with a mechanism to update their credential file to reflect the adjunct faculty expertise.

RECOMMENDED MONITORING: Interim Monitoring Report -- Adjunct Faculty Evaluation. Due May 31, 2019. The monitoring report should address the following:

- (1) Development of process and procedures for adjunct faculty evaluation, to ensure that these faculty are teaching courses with student learning outcomes aligned with the programs in which they teach and that they are assessed for teaching effectiveness. The data from courses taught by adjuncts should be included in program assessment of student learning.
- (2) Documentation of implementation, and how the information gained has been used to strengthen adjunct hiring, training, and evaluation.

3.D - Core Component 3.D

The institution provides support for student learning and effective teaching.

1. The institution provides student support services suited to the needs of its student populations.
2. The institution provides for learning support and preparatory instruction to address the academic needs of its students. It has a process for directing entering students to courses and programs for which the students are adequately prepared.
3. The institution provides academic advising suited to its programs and the needs of its students.
4. The institution provides to students and instructors the infrastructure and resources necessary to support effective teaching and learning (technological infrastructure, scientific laboratories, libraries, performance spaces, clinical practice sites, museum collections, as appropriate to the institution's offerings).
5. The institution provides to students guidance in the effective use of research and information resources.

Rating

Met

Evidence

A review of the university website and discussions with various faculty and administrators shows that the university provides student support services suited to the needs of its student population, including the Writing Room, General Education Tutoring Center, the Center for Academic Enrichment, and the Math Learning Center. The university has a Career Center, an Office of Diversity and Inclusion, a Counseling Center, and Student Health Center among other support services. A review of the university website and discussion with various faculty, administrators, and students shows that the university has a variety of learning support services and preparatory instruction available to students including remedial courses, tutoring for engineering and math courses, tutoring for college of business students, directed support for first generation students (through the federally funded TRiO program), writing support, and general education tutoring. Standardized scores on national exams are used to direct students to appropriate courses (including preparatory courses), and students in all programs cannot enroll in courses without first consulting an academic advisor. Discussions with students shows that student support services available are appropriate for student success. Through review of the university website and discussions with various faculty and administrators, limited evidence was shown that a systematic evaluation process of the effectiveness of learning support services exists across the university, which may be an area for institutional self-assessment.

The university website, discussions with various faculty and administrators, and discussion with the Director for the Center for Academic Enrichment support that the university provides adequate advising for students in all programs and at all levels. The university impanels an Academic Advisory Council which assists individual programs and advisors to ensure quality advising processes and procedures. The university utilizes an automatic degree audit system (Degree Audit Reporting System) which helps advisors ensure an appropriate degree completion path and transfer student evaluation. Discussion with students, review of the Higher Learning Commission student survey

results, and various faculty and administrators shows that while most students are satisfied with available advising processes and procedures, some students have had challenges related to advising, including first year and the transition from first to second year.

A tour of university facilities, a review of the university's Information Technology Strategic plan, and the university website show that the university has adequate infrastructure and resources to support students, faculty, and staff. Technology is supported through the university's Information Technology Services which utilizes a strategic plan and maintains a web page. The university has a variety of quality space including laboratory space, a biological museum, greenhouse, library, performance hall, and student recreation center. Discussions with various faculty, staff, administrators, and students shows that university infrastructure and resources are adequate for a quality education.

Review of the course catalog and discussions with various faculty and administrators shows that all programs require at least one research and writing course as part of the curriculum. The library makes available to students information and training regarding the use of information resources, and works directly with many faculty for classroom presentations regarding information literacy. The university encourages student research through sponsorship of a symposium where students present research results. Through discussion with various faculty and administrators shows that all programs have the availability of independent study courses and many programs encourage students to present research work through annual discipline-specific conferences.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

3.E - Core Component 3.E

The institution fulfills the claims it makes for an enriched educational environment.

1. Co-curricular programs are suited to the institution's mission and contribute to the educational experience of its students.
2. The institution demonstrates any claims it makes about contributions to its students' educational experience by virtue of aspects of its mission, such as research, community engagement, service learning, religious or spiritual purpose, and economic development.

Rating

Met

Evidence

Through review of the university's website and discussions with various faculty and administrators it was shown that the university sponsors a number of co-curricular programs that reflect its mission and positively impacts the student body. Examples include student organizations, sports teams, recreation opportunities, and activities that encourage community involvement, research, and interaction with diverse others. The university houses a Career Center and encourages leadership through its Student Engagement and Leadership program. The university encourages alumni support through the Alumni Association and other donor relationships. Discussion with faculty and students, and through a tour of campus facilities support that co-curricular programs are suited to the institution's mission and have a positive impact on the student experience.

The university's website, discussions with various faculty and administrators, and discussions with the Director for the Division of Extended Studies support that the university provides community outreach through internship opportunities for students, experiential learning opportunities, research that benefits the local community, and the provision of programs through a wide variety of modalities. Examples include infrastructure research, Cannabis research, and social and economic impact studies.

Through discussion with various faculty, staff, students, and administrators it was shown that the university focus, mission, and culture would be strengthened with an increased focus on its designation as a Hispanic Serving Institution through faculty development, curriculum review, infrastructure enhancements, and marketing and promotion.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

3.S - Criterion 3 - Summary

The institution provides high quality education, wherever and however its offerings are delivered.

Evidence

The evidence supports that CSU-Pueblo meets the majority but not all of Criterion 3. Specifically, Core Component 3A is not supported by consistent, aligned evidence in a review of syllabi or discussion with students, faculty, or staff. The lack of evaluating adjunct faculty causes Core Component 3C to be met with concerns.

While the specifics are provided in the 3A section of this report, a summary of these concerns are as follows: There is insufficient evidence to reveal deliberate CSU-Pueblo discussions regarding the alignment of academic program, general studies, and co-curricular expectations for student learning and performance at the undergraduate level OR the differentiation of undergraduate and graduate learning performance expectations. Courses do not exhibit standard language or learning expectations, as evidenced in the syllabi. The course learning expectations are not deliberately aligned with program learning expectations, revealing a layered and sequential learning expectation. Syllabi do not consistently provide sufficient information to support that the student learning expectations are meeting the course learning expectations, or that the credit awarded for the course is supported by the student effort required to successfully complete the course. Graduate and undergraduate learning expectations are clearly differentiated in the university's catalog, but the stacked courses are not consistent in identifying the differential level of learning or performance. Conversations with faculty and students did not reveal an integrated learning across the general studies-discipline-co-curricular programming or how those complement and support student success in their academic program. CSU-Pueblo should make a concerted effort to address the concerns expressed by several of its specialized accreditation bodies, which substantially relate to the identified concerns above.

CSU-Pueblo does have qualified and dedicated faculty and staff providing quality programs and student support services. Tenure-line faculty are evaluated on a regular basis, engage in continuous improvement through training and development, and are accessible to students. However, no process is currently in place to evaluate the performance of adjunct faculty. Given the percentage of courses taught by adjunct faculty, this is a concern.

The university provides quality student advising and encourages and promotes faculty and student engagement in research, community outreach, and experiential learning. While the institution provides quality educational opportunities, the campus is encouraged to develop processes and procedures to ensure that all faculty (both tenure line and temporary) are reviewed for performance on a regular basis. The university is also encouraged to review its processes for student advising. There was some student concern regarding first year advising and advising specific to the first to second year transition. As CSU-Pueblo moves forward, the university is encouraged to be even more deliberate in embracing its designation as an Hispanic Serving Institution through faculty hire and development, curriculum review, infrastructure enhancement, and marketing and promotion.

Core Components 3A and 3C are met with concerns.

4 - Teaching and Learning: Evaluation and Improvement

The institution demonstrates responsibility for the quality of its educational programs, learning environments, and support services, and it evaluates their effectiveness for student learning through processes designed to promote continuous improvement.

4.A - Core Component 4.A

The institution demonstrates responsibility for the quality of its educational programs.

1. The institution maintains a practice of regular program reviews.
2. The institution evaluates all the credit that it transcripts, including what it awards for experiential learning or other forms of prior learning, or relies on the evaluation of responsible third parties.
3. The institution has policies that assure the quality of the credit it accepts in transfer.
4. The institution maintains and exercises authority over the prerequisites for courses, rigor of courses, expectations for student learning, access to learning resources, and faculty qualifications for all its programs, including dual credit programs. It assures that its dual credit courses or programs for high school students are equivalent in learning outcomes and levels of achievement to its higher education curriculum.
5. The institution maintains specialized accreditation for its programs as appropriate to its educational purposes.
6. The institution evaluates the success of its graduates. The institution assures that the degree or certificate programs it represents as preparation for advanced study or employment accomplish these purposes. For all programs, the institution looks to indicators it deems appropriate to its mission, such as employment rates, admission rates to advanced degree programs, and participation rates in fellowships, internships, and special programs (e.g., Peace Corps and Americorps).

Rating

Met

Evidence

SCU-Pueblo maintains a practice of regular program review. The University provides departments with a detailed framework for program review which includes, for example, clear criteria regarding appropriate external reviewers as described in the Curriculum and Academic Program Board "Program Review Self-Study Document." Based on a list provided by the institution with the dates of program reviews, the University's program review process is being followed and the reviews are current. Based on campus interviews, the University's practices allow for a substantive review of each program, which includes developing an action plan, a timeline for implementing actions, and an annual review to verify the timeline is being followed.

Although program review appears to be a well-structured process, it is also extensive and time-consuming and appears to go beyond the statutory requirements for program reviews. Therefore, the Institution may wish to consider if the required documentation and information for program reviews can be streamlined and still meet statutory and institutional needs.

The institution has appropriate policies in place for evaluating the credit it transcripts. This includes both on-campus courses, and courses accepted from other institutions or through testing or other evaluation of prior learning. These policies are described in the University Catalog.

CSU-Pueblo has a clear policy for evaluating transfer credits, which is detailed on the University website and in the University Catalog. Ultimately, faculty are responsible for determining the applicability of a transfer course to program requirements. The University has articulation agreements that clearly indicate whether and how particular courses will transfer. The University also has a clear and appropriate policy on the process for determining the applicability of courses taken from an international university.

Prerequisites or test score requirements are set either institutionally or by department faculty. Curriculum evaluation and approval is through faculty curriculum committees as documented in the Faculty Handbook. Student Learning Outcomes for courses and programs are determined by faculty. The University has clear guidelines for faculty qualifications that are consistent with HLC expectations, and has structure in place for verifying those qualifications. This was documented by a review of qualifications for a sample of 31 faculty and adjunct faculty in the Human Resources Department, and the Extended Studies office.

The University has a well-developed process for academic department review of syllabi, and validation of the credentials of the instructors teaching dual credit programs. However, it is not clear that a systematic process is in place to validate that the learning outcomes are the same, and that students have equivalent learning outcomes in the dual credit courses, as compared to traditional university courses. See additional comments in the Evidence section for Core Component 3A.

The Institution maintains appropriate specialized accreditation, particularly in fields like Nursing, Social Work, and Engineering, where accreditation is critical for the success of graduates. However, some recent specialized accreditation visits have resulted in a requirement for follow-up (for example, in Music and Nursing), and it will be important for the institution to address those concerns. The institution may wish to consider a centralized process for reviewing the findings from specialized accreditors to ensure the success of future visits.

The University provides several measures regarding the success of graduates. One metric is the pass rate on licensure exams, which is provided as a link from the institutional research website. The Institution also uses surveys to measure the success of graduates. A survey is given to students prior to graduation, and information from the most recent administration of the survey was provided. In addition, the institution is surveying students six months after graduation (first survey in fall of 2016) and five years after graduation. Information posted on the Institutional Research website indicates that surveys were conducted five years after graduation in 2015-2016 and 2009-2010. The response rate for the most recent survey was about 16%, and the institution may wish to develop strategies to increase this rate, in order to have a more robust understanding of alumni success.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

4.B - Core Component 4.B

The institution demonstrates a commitment to educational achievement and improvement through ongoing assessment of student learning.

1. The institution has clearly stated goals for student learning and effective processes for assessment of student learning and achievement of learning goals.
2. The institution assesses achievement of the learning outcomes that it claims for its curricular and co-curricular programs.
3. The institution uses the information gained from assessment to improve student learning.
4. The institution's processes and methodologies to assess student learning reflect good practice, including the substantial participation of faculty and other instructional staff members.

Rating

Met With Concerns

Evidence

The institution has developed an appropriate framework for assessing student learning outcomes. All programs, graduate and undergraduate, have Student Learning Outcomes, and these are published both in the University Catalog, and in each program's assessment plan. This includes Student Learning Outcomes for the General Education program.

Assessment has clearly become a University priority, with specific strategies included in the University Strategic plan for improving assessment processes. The University has also provided resources to support assessment, including an Assistant Provost position to oversee assessment.

The University has articulated its process for the evaluation of assessment work in a 2013 document (*Assessment Process for Academic Programs*) that describes requirements for reporting assessment data and reviewing the assessment reports. There is also integration of the program review process and assessment, in that program reviews include a curriculum map that shows how the learning outcomes are scaffolded across the curriculum, as demonstrated through a review of program review documents made accessible through a Google Drive.

Programs are generally up-to-date with annual assessment work, and each program has a current assessment plan. In addition, the University has taken efforts to ensure that non-academic programs also develop assessment plans, and report on the assessment work they have completed.

The University's assessment processes and procedures generally reflect good practice. There is a centralized process of coordination and review, with faculty acting as the primary drivers in determining appropriate outcomes, and determining how best to measure those outcomes.

While the University has made progress with assessment since the last site visit, this progress appears to have been episodic, and is not as substantial as would have been expected since the completion of the monitoring report in 2010. Specifically, the team identified the following concerns:

- We did not find evidence that student learning outcomes were consistent, and were assessed in the same way, regardless of the method of course delivery. This was based on a review of 70 course syllabi and conversations during campus meetings (see Criterion 3A).
- The University-wide Assessment plan document was dated 2009. Based on campus interviews, this guide has not been updated. The HLC review of the follow-up report in 2011 indicated that a draft of the General Education Assessment plan was to be completed by the time of the 2016-2017 site visit, but we did not find evidence that has occurred.
- The assurance argument indicated that General Education courses were mapped in 2009, but the map was not available, and it wasn't clear, based on conversations with individuals involved with assessment on campus, if this map had subsequently been updated.
- In terms of oversight, it is not clear which body has oversight over all the assessment activities on campus. The Institutional Effectiveness Committee was recently reconstituted, but did not appear to have a clear charge or role in assessment work, based on on-campus interviews.
- The assurance argument provides limited evidence about changes that have been made to improve student learning, based on the assessment results. Since this is the key result of assessment (improvement based on analysis of data about student learning) the limited evidence about changes remains a concern about CSU-Pueblo's assessment process. A spreadsheet was provided by the institution listing changes made program-by-program in response to assessment findings. However, many of these changes were changes in assessment tools and processes, and didn't address modifications made to directly improve student learning.
- The concern about a lack of evidence of changes resulting from review of assessment data is even more prominent in the general education curriculum. The measures currently used in general education (e.g. Proficiency Profile, Critical Thinking Assessment Test) seem primarily focused on demonstrating student achievement, and not focused on curricular improvement or the enhancement of student learning. In fact, it may be difficult to translate the results of the current measures being used into specific action steps to enhance student attainment of the general education learning outcomes, and that concern was evident based on conversations during campus meetings. Neither the assurance argument, nor information from campus meetings, provided evidence of widespread faculty engagement in using data from general education assessment to improve courses or student learning in general education.
- In terms of best practices, the key area of concern is in "closing the loop"; ensuring that assessment information is used to assist in continuously improving student learning. While some programs are clearly engaged in this critical element of the assessment process, it appears that a number of programs have not yet developed their assessment system to the point where it materially contributes to improving instruction and student learning.

Interim Monitoring (if applicable)

Concern 5: CSU-Pueblo submitted an interim monitoring report in 2010 that indicated that the institution would make further progress toward using assessment in improving processes, procedures, and support for student learning. The institution has not achieved the expected level of integration in this initiative. Based upon a review of the findings, including the concerns within recent specialized accreditation reports, the Visit Team recommends the following:

RECOMMENDED MONITORING: Interim Monitoring Report -- Program Alignment and Assessment (continued from 3A). Due May 31, 2019.

Within the requested monitoring report that addresses several of the Federal Compliance Concerns

and those concerns expressed in Criterion 3A (1 through 6), please also address the following areas of concern:

(7) Process of and evidence of effectiveness in ensuring that faculty, instructional academic staff, and others who are engaged in assessment work have the necessary training to conduct effective assessment of student learning;

(8) Clarification of the role of the Institutional Effectiveness Committee in relation to assessment processes, improvement of processes, updates of institutional assessment plans, and communication of assessment information to the campus community;

(9) Updating the Institutional Assessment Plan and General Education Assessment Plan; and

(10) Process and assurance that all programs are closing the loop in assessment - that they have developed an effective assessment process where the assessment process leads to changes that improve student learning, as compared to making adjustments in the assessment process itself. This should include both academic programs and co-curricular programs. The assessment process does not need to be complex or inordinately time-consuming; rather a simple, focused, meaningful approach to assessment which is designed to identify areas where student learning can be improved, is the intended goal.

4.C - Core Component 4.C

The institution demonstrates a commitment to educational improvement through ongoing attention to retention, persistence, and completion rates in its degree and certificate programs.

1. The institution has defined goals for student retention, persistence, and completion that are ambitious but attainable and appropriate to its mission, student populations, and educational offerings.
2. The institution collects and analyzes information on student retention, persistence, and completion of its programs.
3. The institution uses information on student retention, persistence, and completion of programs to make improvements as warranted by the data.
4. The institution's processes and methodologies for collecting and analyzing information on student retention, persistence, and completion of programs reflect good practice. (Institutions are not required to use IPEDS definitions in their determination of persistence or completion rates. Institutions are encouraged to choose measures that are suitable to their student populations, but institutions are accountable for the validity of their measures.)

Rating

Met

Evidence

CSU-Pueblo has defined realistic goals for retention, persistence, and completion, and has included those goals in its current strategic plans. Evidence that these goals are data-based and realistic include progress the institution has already made in increasing its retention rate.

The institution has generated substantial amounts of data regarding student persistence and completion. These are included in dashboards and the institutional fact book in the institutional research website. This information is also provided at the level of the individual academic program to increase awareness, and facilitate the ability of departments to assist institutional efforts to improve these rates.

The institution has used a consultant to develop strategies to more effectively promote retention, persistence, and completion. These strategies have led to changes intended to promote student success, including folding first-year programs into a single Center and enhancing the use of an early alert system for students who may be experiencing academic difficulty. Since the institution has implemented these strategies, student retention (students returning the 2nd fall) has continued to improve based on data provided in the Institutional Research website.

The institution uses federal and state definitions for data collection and reporting, which reflects good practice. In addition, the institution also collects and reports more detailed information, such as disaggregation of data based on gender and minority status, when required for internal purposes.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

4.S - Criterion 4 - Summary

The institution demonstrates responsibility for the quality of its educational programs, learning environments, and support services, and it evaluates their effectiveness for student learning through processes designed to promote continuous improvement.

Evidence

The evidence does not support that CSU-Pueblo fully meets the expectations of Criterion 4. Specifically, Core Component 4B, assessment of student learning, lacks sufficient evidence to ensure that the assessment process results in systematic improvement of learning outcomes, based upon the gathered data.

The institution demonstrates responsibility for the quality of its educational programs, through a process of regular program review, through oversight of courses it transcripts, and through the evaluation of faculty credentials. The institution has developed a framework for assessing student learning, although additional work will be required to ensure that the assessment process results in systematic improvement of learning outcomes. Additional focus in this area is requested through the Interim Monitoring Report detailed in 3A and 4B. The institution does have processes in place for tracking student retention, persistence, and completion and has developed strategies to improve in all those measures of student success.

Core Component 4B is met with concerns.

5 - Resources, Planning, and Institutional Effectiveness

The institution's resources, structures, and processes are sufficient to fulfill its mission, improve the quality of its educational offerings, and respond to future challenges and opportunities. The institution plans for the future.

5.A - Core Component 5.A

The institution's resource base supports its current educational programs and its plans for maintaining and strengthening their quality in the future.

1. The institution has the fiscal and human resources and physical and technological infrastructure sufficient to support its operations wherever and however programs are delivered.
2. The institution's resource allocation process ensures that its educational purposes are not adversely affected by elective resource allocations to other areas or disbursement of revenue to a superordinate entity.
3. The goals incorporated into mission statements or elaborations of mission statements are realistic in light of the institution's organization, resources, and opportunities.
4. The institution's staff in all areas are appropriately qualified and trained.
5. The institution has a well-developed process in place for budgeting and for monitoring expense.

Rating

Met With Concerns

Evidence

The institution has appropriate physical and technological environments to support its educational programs, based on building walk-throughs during the site visit and conversations with campus constituents. Recent upgrades (HVAC, roof, technology) and new building construction have allowed for improvement of those physical assets using funds from both the state of Colorado and donors to the university.

The Composite Financial Index data raises concerns about the ability of the institution to sustain its operations. While the overall CFI has been within or above the zone for the past seven years, components within the CFI suggest areas of concern. With respect to the net operating revenue ratio within the CFI, six of the past seven years are below zone of three to four percent, including the four most recent years being negative. Consequently, it appears that during six of the past seven years, operating results indicate CSU-Pueblo has not been living within available resources (Strategic Financial Analysis for Higher Education: Identifying, Measuring & Reporting Financial Risks, Seventh Edition, by KPMG LLP; Prager, Sealy & Co. LLC, p. 107). With respect to the primary reserve ratio within the CFI, the most recent year is below the goal of .40 and in fact is also negative. This data suggests that resources at CSU-Pueblo are not sufficient and flexible enough to support the mission for the most recent year (Ibid.).

Providing appropriate technology infrastructure has been a challenge but steps have been taken to improve the delivery of technology. The institution acknowledged difficulty in generating accurate financial statements so beginning July 1, 2014 a new financial system used by a colleague institution was utilized by CSU-Pueblo to help provide a reliable accounting and reporting environment. In addition, state funds were acquired for two significant upgrades. The first project was a modular data center using FY 2015 state funds of \$1,864,800 and the second project included technology infrastructure upgrades using FY 2016 state funds of \$1,826,471.

Planning for information technology is focused using 2013 - 2018 Information Technology Strategic Plan and Review. The plan has goals in the areas of instructional technology, classroom multimedia, network and systems, information support, telecommunications, and help desk.

Resource allocation is determined by the President and cabinet with the University Budget Board (UBB) serving in an advisory capacity. The UBB evaluates Educational & General (E&G) fund requests and provides recommendations. This group is informed but not actively involved with auxiliary funds allocation. Board of Governors policy provides direction to the university for budget guidelines and procedures.

In April 2007 the Board of Governors approved expansion of the athletic program. In fiscal year 2017, 6.9% of the E&G funds are allocated to the Athletic department. Faculty comments indicate support for the role athletes have played in increased enrollment and their contributions both in and out of the classroom. The football stadium was built by donors on private property adjacent to the University, and leased to the University. The agreement between the donor organization and the university stipulate each party cover fifty percent of the maintenance costs. The University works cooperatively with Friends of Football to determining timing and cost of maintenance. For example, the artificial turf was replaced in 2016, and the university's share of the cost was \$350,000. The CSU System contributed \$300,000 and CSU-Pueblo contributed \$50,000 toward this project. The institution may wish to consider if it will continue to be financially sustainable to have an external entity determine when maintenance costs need to be funded. In addition, the number of athletics programs offered on campus results in a significant cost, and it is not clear this breadth of programming is financially sustainable.

Based on visits with Human Resources and Extended Studies staff, and reviewing a sample of 31 faculty credentials, faculty and staff are appropriately qualified for their respective area of employment. The university mandates training on preventing discrimination and sexual violence in support of Title IX, VAWA, and Clery Act and unlawful harassment prevention for all new employees. As described in the assurance argument, additional training is available for employees, including "training for the performance evaluation process, training in the financial system, active shooter training, and facility training."

Budget development occurs in two primary areas. The first is through a traditional management structure of unit or department head to dean and the vice president level. The second primary area is with the UBB providing recommendations to the President's cabinet. According to the faculty handbook and evidenced through discussions during the site visit, the UBB is broadly comprised of representatives from academic and non-academic units, faculty, staff, and students.

Interim Monitoring (if applicable)

Concern 6: CSU-Pueblo experienced significant financial challenges in 2011 and in 2014. A review of recent financial documents indicates continuing financial analysis evidence that the institution is not generating the revenue necessary to sustain its current operations. The recommendation of the Visit Team is for an Interim Monitoring Report as follows:

RECOMMENDED MONITORING: Interim Monitoring Report -- Fiscal Capacity and Sustainability Due May 31, 2019: (indicated by Federal Compliance Report Assurance Argument, Campus Visit, and Financial Reports): The monitoring report should address the following:

- (1) Review of the policies and procedures implemented in FY 2017 regarding Title IV Funding and their effectiveness in addressing and ameliorating the audited material weaknesses in this area (a further Area of Focus is requested within the Standard Pathway year four comprehensive evaluation in Spring 2021, as detailed in Core Component 2A);
- (2) A longitudinal analysis of improvement in addressing recurring material weaknesses presented in CSU System audits that relate to CSU-Pueblo, and articulation of changes in processes or procedures that have addressed those concerns;
- (3) Evidence of improvement of the net operating revenue ratio and a positive primary reserve ratio, detailing changes in operations that have moved the institution toward fiscal stability and sustainability.

5.B - Core Component 5.B

The institution's governance and administrative structures promote effective leadership and support collaborative processes that enable the institution to fulfill its mission.

1. The governing board is knowledgeable about the institution; it provides oversight of the institution's financial and academic policies and practices and meets its legal and fiduciary responsibilities.
2. The institution has and employs policies and procedures to engage its internal constituencies—including its governing board, administration, faculty, staff, and students—in the institution's governance.
3. Administration, faculty, staff, and students are involved in setting academic requirements, policy, and processes through effective structures for contribution and collaborative effort.

Rating

Met

Evidence

As shown through by-laws, minutes and agendas, the Colorado State University Board of Governors convenes to discuss, research, and act regarding the institution through quarterly meetings and two annual retreats. Agendas include work product from standing committees such as Audit and Finance, Real Estate/Facilities, Academic and Student Affairs, and Executive Committee. Academic programs including degrees and certificates, academic policies and student affairs programs are reviewed, monitored and approved by the board.

The Board receives quarterly updates on system financial performance. CSU-Pueblo is discreetly shown on the reports for the first three quarters. Year end financial statements do not have CSU-Pueblo reported discreetly, rather they are included in aggregate. The lack of discreetly presented CSU-Pueblo data for the fourth quarter may complicate a complete analysis and understanding of the CSU-Pueblo's financial condition.

According to Board minutes and confirmed by interviews on campus, the institution has the opportunity to engage the governing board at each meeting; reports are received from the Associated Students' Government President, Faculty Senate and the President. The institution can also engage the governing board through membership on the board. Two of the fifteen members of the governing board are required to be from CSU-Pueblo. The Board bylaws stipulate that one of those members "shall be an elected officer of its faculty council, who must hold the rank of associate professor or higher" and the other member "shall be an elected officer of the student body, who must be a full-time junior or senior student."

Faculty, staff and students are involved in institutional governance. The Faculty Handbook shows faculty are engaged using shared governance through the Faculty Senate. Staff are engaged through two councils, the Administrative Profession Council and the Classified Professional Council. In addition, students are engaged through representation on the student government, Associate

Students' Governance.

The university uses boards for collaborative governance. Boards are comprised of students, faculty and administrators. One such board is the Curriculum and Academic Programs (CAP) Board, the purpose of which is "to recommend to the Faculty Senate on matters of undergraduate, and graduate curriculum, program development and review, and policies and procedures regarding curriculum and academic programs." The board meets at least four times per semester. The work plan of the CAP include a six year forward calendar to evaluate academic programs. Another example is the UBB (addressed in Core Components 5A and 5C).

In campus meetings, faculty and administrative leaders indicated that, under the current president, most individuals feel engaged and are provided full information regarding budgets and other issues relevant to the campus. A very few individuals forwarded concerns that even though the information is much more accessible and transparent under Dr. Di Mare's presidential reign, the uncertainty regarding financial report accuracy and monitoring from prior to her presidency remains an underlying apprehension.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

5.C - Core Component 5.C

The institution engages in systematic and integrated planning.

1. The institution allocates its resources in alignment with its mission and priorities.
2. The institution links its processes for assessment of student learning, evaluation of operations, planning, and budgeting.
3. The planning process encompasses the institution as a whole and considers the perspectives of internal and external constituent groups.
4. The institution plans on the basis of a sound understanding of its current capacity. Institutional plans anticipate the possible impact of fluctuations in the institution's sources of revenue, such as enrollment, the economy, and state support.
5. Institutional planning anticipates emerging factors, such as technology, demographic shifts, and globalization.

Rating

Met

Evidence

The University has a process for the allocation of resources, described in the document "Budget Guidelines and Procedures," that is led by the Vice President for Finance and Administration. This process includes the Cabinet and involves a broadly representative group, the University Budget Board (UBB). Budget requests need to align with and specifically reference the University's strategic plan.

The institution has developed a framework for budgeting, has a current strategic plan, and has mechanisms in place for evaluating operations and assessing student learning. The assessment of operations has influenced changes in resource allocations as evidenced by the investment of \$12.5 million in energy improvement projects, some of which will address concerns in a Commission Action Report from the National Association of Schools of Music (in review of CSU-Pueblo's application for accreditation).

However it is not clear how the information from the assessment of student learning is directly connected to the budget process. The assurance argument does not provide examples of how the assessment of student learning has led to specific budget requests, or changes in budget allocations. Strengthening the student learning alignment and assessment processes through the requested Interim Monitoring Report in 3A and 4B may disclose specific information that is useful in this regard.

The strategic planning process utilized a group which represented all staff types including the academic council, faculty, administrative professional staff, classified staff, and students. In addition, the local community was provided an opportunity for input. The draft version of the strategic plan was distributed throughout campus and feedback solicited. Since adoption of the plan, an implementation team has been appointed to ensure implementation utilizing dashboards.

As stated by members of the UBB, that board receives updates from the Vice President for Finance

and Administration which provide context regarding revenues, enrollment, the economy and state support to aid in budget development recommendations. The institution developed a budget reduction plan during FY14 as a result of a significant revenue shortfall. Consequently most open positions were eliminated or frozen according to the deans, and campus constituents report that funding remains tight. Additionally, most requests to the UBB for new initiative funding have only a limited opportunity for success, given the tight budget conditions.

New new residence halls opened in Fall 2009 and Fall 2010, and were financed with bonds. The institution has been unable to meet the bond payments and has relied on system funds to make the payments for the past two years. The ability for the institution to meet future bond payments does not seem likely according to two senior level administrators. The FY17 auxiliary budget indicates housing units are budgeted at a loss. Undergraduate students are required to live on campus for their first two years, according to discussions with administrators, which provides a consistent although not sufficient revenue flow. The recent and planned construction of privately-owned apartments adjacent to campus may reduce the ability of the institution to retain students within the residential facilities after the required two-year period.

As shared in the assurance argument and validated multiple times in campus interviews, CSU-Pueblo recognizes its strength as an Hispanic Serving Institution. The institution also is cognizant of increasing numbers of high school graduates in the state of Colorado and is finding success in increasing enrollment of students from other states and international students. Study abroad programs in multiple countries provide opportunities for students to have a more global experience.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

5.D - Core Component 5.D

The institution works systematically to improve its performance.

1. The institution develops and documents evidence of performance in its operations.
2. The institution learns from its operational experience and applies that learning to improve its institutional effectiveness, capabilities, and sustainability, overall and in its component parts.

Rating

Met With Concerns

Evidence

The Office of Institutional Research provides data that is used to inform decision-making across the campus. The Office provides information to assist in academic program reviews, and helps with data collection using surveys and other tools for other areas of campus. In addition, general information about various aspects of the campus is provided on the Institutional Research website. Although the current Director is relatively new in her role, significant progress has been made in providing data in a form that is readily usable for the campus.

Other examples of data collection include surveys conducted by other units on campus, using Campus Lab software. For example, Student Affairs offices have used surveys to gauge student satisfaction with various services, and make changes based on student concerns. Student Affairs also engaged Council for the Advancement of Standards in Higher Education (CAS Standards) in a self-study of the various units comprising Student Affairs. Similarly, Residence Life and Dining Services garner feedback from students and make change based on that input, as documented in the Dining Services Survey document and assessments from EBI.

It is not clear if individual reports are evaluated systemically. Feedback from employees in on-campus sessions indicated an interest in using data to inform improvements in services for students.

As identified in the Federal Compliance Report and seen in multiple state audit reports, three issues of concern related to Financial Aid were identified. In visiting with the Director and Associate Director of Financial Aid, causes for the issues and remediation steps were shared. In the case of enrollment validation with the National Student Clearinghouse and National Student Loan Data System, enrollment files are now uploaded every three weeks to allow for time to resolve discrepancies reported back to the institution. In addition, enrollment data for Spring term is sent at the beginning of the term in addition to census date in order to avoid the 60 day default. The Associate Director reported a positive working relationship with the Registrar's Office. The problems with federal Pell grant reporting were related to a staff member on maternity leave and the processes not being well documented for others to utilize in her absence. The Financial Aid office has updated their work lists to avoid this issue in case of future absences or turnover. The third issue involved irregularities in the distribution dates. The Financial Aid office brought in a consultant related to their software package who helped identify some enhanced functionality of the PowerFAIDS program which enabled the staff to resolve this matter. All three matters appear resolved and fully implemented.

Interim Monitoring (if applicable)

Although many areas within CSU-Pueblo are utilizing a continuous improvement model, the implementation across campus is not homogenous. Concerns 1 and 2 (within Core Component 2A), Concerns 3, 4, and 5 (within Core Components 3A, 3C, and 4B), and Concern 6 (in Core Component 5A) all involve the deliberate collection of appropriate data, and having the right people review that information to make informed decisions that can drive institutional improvement in performance. The monitoring for 5D is embedded in each of these respective areas of recommended monitoring.

5.S - Criterion 5 - Summary

The institution's resources, structures, and processes are sufficient to fulfill its mission, improve the quality of its educational offerings, and respond to future challenges and opportunities. The institution plans for the future.

Evidence

The evidence does not support that CSU-Pueblo fully meets Criterion 5. Specifically, the evidence suggests that Core Component 5A is an area of concern that needs continued analysis and change. Concerns in Core Component 5D reflect those identified earlier in 2A, 3A, 3c, 4b, and 5A.

CSU-Pueblo experienced a significant budget challenge in FY2014 which has continued with constrained financial resources. As the extent of this challenge became evident in late 2013, the institutional leaders involved broad campus constituencies (Faculty Senate, Institutional Budget Board, and AAUP as well as other campus groups) in discussions to identify potential short-term and long-term solutions. Despite these limited financial resources, dedicated faculty and staff, including more recent hires, have provided good leadership and creative responsiveness to the challenging financial environment. The physical plant and technology have benefited from investments through donors and the legislature. The buildings on campus are well maintained. The physical structures in place support the delivery of the institution's mission. Finally, supporting the operations of the institution are a series of boards and representative groups with a culture of transparency that facilitates engagement from all facets of the institution. The current president and cabinet promote this engagement and transparency which allow for better decision making. Difficult decisions have been made the past three years relative to operations but the campus appreciates the manner in which those decisions have been made.

Although progress has been made in addressing concerns about the accuracy of the financial records, the institution still has issues related to financial sustainability based on components of the CFI, contractual issues related to the football stadium maintenance, and inability of the institution to make bond payments on the housing without support from the system level. Additionally, many of the new processes have been implemented only recently, so no data analysis of the impact of those processes is yet available.

Core Component 5A and 5D are met with concerns.

Review Dashboard

Number	Title	Rating
1	Mission	
1.A	Core Component 1.A	Met
1.B	Core Component 1.B	Met
1.C	Core Component 1.C	Met
1.D	Core Component 1.D	Met
1.S	Criterion 1 - Summary	Met
2	Integrity: Ethical and Responsible Conduct	
2.A	Core Component 2.A	Met With Concerns
2.B	Core Component 2.B	Met
2.C	Core Component 2.C	Met
2.D	Core Component 2.D	Met
2.E	Core Component 2.E	Met
2.S	Criterion 2 - Summary	Met With Concerns
3	Teaching and Learning: Quality, Resources, and Support	
3.A	Core Component 3.A	Met With Concerns
3.B	Core Component 3.B	Met
3.C	Core Component 3.C	Met With Concerns
3.D	Core Component 3.D	Met
3.E	Core Component 3.E	Met
3.S	Criterion 3 - Summary	Met With Concerns
4	Teaching and Learning: Evaluation and Improvement	
4.A	Core Component 4.A	Met
4.B	Core Component 4.B	Met With Concerns
4.C	Core Component 4.C	Met
4.S	Criterion 4 - Summary	Met With Concerns
5	Resources, Planning, and Institutional Effectiveness	
5.A	Core Component 5.A	Met With Concerns
5.B	Core Component 5.B	Met
5.C	Core Component 5.C	Met
5.D	Core Component 5.D	Met With Concerns
5.S	Criterion 5 - Summary	Met With Concerns

Review Summary

Interim Report(s) Required

Due Date

4/30/2021

Report Focus

Embedded monitoring within the Year 4 Comprehensive Evaluation on the Standard Pathway: Student complaint policy, processes, and assessment; Due Spring 2021. (Indicated by Concerns within 2A, 5D, and Federal Compliance)

Please include within your Standard Pathway four-year comprehensive visit assurance argument evidence to support an area of focus review regarding the Federal Compliance Review and Core Component 2A concern regarding 'closing the loop' in student concern assessment. The review should (1) identify the processes and procedures in place in 2021 for documenting student complaints, and which offices are involved in receiving formal complaints and informal concerns; (2) summarize processes, procedures, and complaints assessment that has occurred since the 2017 campus visit and who are involved in those discussions; and (3) track the findings and subsequent changes made to improve communications, processes/procedures, and/or policy as a result of the student complaint/concern assessment of data.

(Addresses Team Concern 1)

Due Date

4/30/2021

Report Focus

Embedded Monitoring within Year 4 Comprehensive Evaluation on the Standard Pathway: Title IV Federal Aid Processes and Procedures; Due Spring 2021 (indicated by Federal Compliance Review; Core Components 2A and 5D, and CSU-System annual audits):

This report should identify (1) the processes and procedures implemented in FY 2017; (2) the effectiveness of these processes in addressing and ameliorating the audited material weaknesses in this area; (3) a summary of the way that data is collected, analyzed, and used to make improvements, and who is involved in those discussions; and (4) a tracking of changes made to improve communications, processes/procedures, and/or policy as a result of the assessment of data.

(Addresses Team Concern 2)

Due Date

5/31/2019

Report Focus

Interim Monitoring Report, Program Alignment and Assessment. Due May 31, 2019. (Indicated by Federal Compliance Review, Core Components 3A, 4B, and 5D)

Please submit an interim report that address the following areas of concern, providing evidence appropriate to move the institution into full compliance with Federal Compliance, Core Component 3A, and Core Component 4B:

- (1) Alignment of expectations for student learning and performance capacity across the required courses within a program's curriculum. The course learning outcomes should evidence the strategic stratification of learning and performance from the entry through the exit level, as indicated in syllabi-articulated learning outcomes and well-defined learning assessment measures that clearly align with program learning outcomes;
- (2) Consistency in expected student learning and performance outcomes within a course across modalities, instructor, and terms, to ensure that students are receiving equivalent learning in their progression toward their degree (note that the expected learning should be the same, although the method of effecting and assessing that learning can differ from instructor-to-instructor or across modalities, in alignment with credit hour expectations). Common understanding of terms such as "goal," "objective," and "outcome" should be evident in syllabi and in the catalog;
- (3) Articulated syllabi evidence to support credit hour application and communication of expected student effort, as related to the student learning outcomes and assessment measures, with sufficient evidence to support the level of assigned credit for that course, at the assigned class rank;
- (4) Differentiation of undergraduate/graduate learning expectations within scaffolded (400-500) courses and how those differentiated outcomes are assessed appropriate to the expected level of learning, understanding, and knowledge integration of these two levels;
- (5) Integration of the curricular (discipline and general studies) and co-curricular student experiences to meet the expected student outcomes at the appropriate levels (undergraduate and graduate). At the undergraduate level this would include consideration of the knowledge, skills, and abilities designed to be developed through the general education curriculum and how these articulate with and support program learning outcomes;
- (6) Progress on addressing deficiencies and conditions cited by specialized accrediting bodies;
- (7) Process of and evidence of effectiveness in ensuring that faculty, instructional academic staff, and others who are engaged in assessment work have the necessary training to conduct effective assessment of student learning;
- (8) Clarification of the role of the Institutional Effectiveness Committee in relation to assessment processes, improvement of processes, updates of institutional assessment plans, and communication of assessment information to the campus community;
- (9) Updating the Institutional Assessment Plan and General Education Assessment Plan; and
- (10) Process and assurance that all programs are closing the loop in assessment - that they have developed an effective assessment process where the assessment process leads to changes that improve student learning, as compared to making adjustments in the assessment process itself. This should include both academic programs and co-curricular programs. The assessment process does not need to be complex or inordinately time-consuming; rather a simple, focused, meaningful approach to assessment which is designed to identify areas where student learning can be improved, is the intended goal.

(Addressed Team Concerns 3 and 5)

Due Date

Not Set.

Report Focus

Interim Monitoring Report: *Adjunct Faculty Evaluation; Due May 31, 2019.*

(Indicated by concerns in Core Component 3C)

The monitoring report should address the following:

- (1) Development of process and procedures for adjunct faculty evaluation, to ensure that these faculty are teaching courses with student learning outcomes aligned with the programs in which they teach and that they are assessed for teaching effectiveness. The data from courses taught by adjuncts should be included in program assessment of student learning.
- (2) Documentation of implementation, and how the information gained has been used to strengthen adjunct hiring, training, and evaluation.

(Addresses Team Concern 4)

Due Date

5/31/2019

Report Focus

Interim Monitoring Report, *Fiscal Capacity and Sustainability; Due May 31st, 2019.* (Indicated by Federal Compliance Review, Core Components 3A, 5A and 5D, CSU-System annual audits, and HLC Institutional Updates FY2012 through FY 2016):

Please submit an interim report that addresses the following areas of concern, providing evidence to indicate that the institution is compliant with no concerns for Core Component 5A:

- (1) Review of the policies and procedures implemented in FY 2017 regarding Title IV Funding and their effectiveness in addressing and ameliorating the audited material weaknesses in this area (a further Embedded Monitoring is requested within the Standard Pathway year four comprehensive evaluation in Spring 2021, as detailed in Core Component 2A and below);
- (2) A longitudinal analysis of improvement in addressing recurring concerns, material weaknesses, and findings presented in CSU System audits that relate to CSU-Pueblo, and articulation of changes in processes or procedures that have addressed those concerns;
- (3) Evidence of improvement of the net operating revenue ratio and a positive primary reserve ratio, detailing changes in operations that have moved the institution toward fiscal stability and sustainability.

(Addresses Team Concern 6)

Conclusion

Colorado State University-Pueblo has implemented significant changes to strengthen and improve their financial status, operations, and processes during the past three years under the leadership of President Di Mare, as evidenced by the assurance argument and campus communications.

- Financial Issues have been evident at the institution from 2011 forward, resulting in a new financial system that provides reliable and consistent data, new processes to provide oversight for financial reporting to the US Department of Education, and increased input from campus constituents and transparency in budgetary decisions;
- A new degree audit reporting system has been implemented;
- Processes and policies are being articulated and located in an accessible internal drive;
- Increased outreach, through a focus on experiential learning and the development of the Institute for Cannabis Research have strengthened the campus-community relations; and
- Structures are in place for CSU-Pueblo to develop a strong niche reputation as a leader in quality education in an Hispanic Serving Institution environment.

The Federal Compliance Review plus the Visiting Team's review of the Assurance Argument and campus conversations and other documents indicate several areas of concern, however, including in the application of credit hours to courses, alignment of courses and program learning outcomes, use of assessment to improve processes and student learning, assessment of adjunct faculty, federal financial aid reporting processes and procedures, student complaint tracking, financial stability and sustainability, and concerns due to specialized accreditation reviews.

Given the extent of these concerns and the evidence considered, the Visit Team recommends that CSU-Pueblo utilize the Standard Pathway for Accreditation. In addition, the following are recommended:

- An interim monitoring report in two years on academic program alignment, academic program accreditation, and both academic and non-academic assessment
- An interim monitoring report on adjunct faculty evaluation
- An interim monitoring report in two years on financial capacity and sustainability
- During the Standard Pathway Year 4 Comprehensive Evaluation, embedded monitoring on the following:
 1. Student complaint tracking, assessment, and use of data for improvement,
 2. Title IV funding reporting assessment and the use of data for improvement.

The Team expects that CSU-Pueblo will continue to make progress to strengthen the campus and its financial capacity; the Standard Pathway will provide CSU-Pueblo's incoming President with additional support and consultative oversight to help ensure that recent initiatives come to fruition.

Overall Recommendations

Criteria For Accreditation

Met With Concerns

Sanctions Recommendation

No Sanction

Pathways Recommendation

Limited to Standard



FORM

Federal Compliance Worksheet for Evaluation Teams

Evaluation of Federal Compliance Components

The team reviews each item identified in the *Federal Compliance Filing by Institutions* (FCFI) and documents its findings in the appropriate spaces below. Teams should expect institutions to address these requirements with brief narrative responses and provide supporting documentation where necessary. Generally, if the team finds in the course of this review that there are substantive issues related to the institution's ability to fulfill the Criteria for Accreditation, such issues should be raised in the appropriate parts of the Assurance Review or Comprehensive Quality Review.

This worksheet is to be completed by the peer review team or a Federal Compliance reviewer in relation to the federal requirements. The team should refer to the *Federal Compliance Overview* for information about applicable HLC policies and explanations of each requirement.

Peer reviewers are expected to supply a rationale for each section of the Federal Compliance Evaluation.

The worksheet becomes an appendix in the team report. If the team recommends monitoring on a Federal Compliance Requirement in the form of a report or focused visit, the recommendation should be included in the Federal Compliance monitoring sections below and added to the appropriate section of the Assurance Review or Comprehensive Quality Review.

Institution under review: Colorado State University - Pueblo

Please indicate who completed this worksheet:

- ☒ Evaluation team
- ☒ Federal Compliance reviewer

To be completed by the Evaluation Team Chair if a Federal Compliance reviewer conducted this part of the evaluation:

Name: Joyce Phillips Hardy

- ☒ I confirm that the Evaluation Team reviewed the findings provided in this worksheet.

Assignment of Credits, Program Length and Tuition

(See FCFI Questions 1–3 and Appendix A)

1. Complete the [Team Worksheet for Evaluating an Institution's Assignment of Credit Hours and Clock Hours](#). Submit the completed worksheet with this form.
 - Identify the institution's principal degree levels and the number of credit hours for degrees at each level (see the institution's Appendix A if necessary). The following minimum number of credit hours should apply at a semester institution:
 - Associate's degrees = 60 hours
 - Bachelor's degrees = 120 hours
 - Master's or other degrees beyond the bachelor's = At least 30 hours beyond the bachelor's degree
 - Note that 1 quarter hour = 0.67 semester hour.
 - Any exceptions to this requirement must be explained and justified.
 - Review any differences in tuition reported for different programs and the rationale provided for such differences.
2. Check the response that reflects the evaluation team or Federal Compliance reviewer's conclusions after reviewing this component of Federal Compliance:
 - ☐ The institution meets HLC's requirements.
 - ☒ The institution meets HLC's requirements, but additional monitoring is recommended.
 - ☐ The institution does not meet HLC's requirements and additional monitoring is recommended.
 - ☒ The Federal Compliance reviewer/evaluation team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (Criterion 3A.3 .

Rationale:

A review of 70 syllabi across multiple programs and student class levels provides insufficient evidence of the application of the institution's credit hour policy (adopted August 2016). It is unclear if the levels of performance required of students are appropriate or consistent across all modes of delivery, across different sections offered by different faculty, or at all locations, based on this review. The reviewed syllabi are inconsistent in including the policy regarding credit hour assignment and sufficient detail to evidence that the course requires appropriate student engagement for the credit hours assigned to the course.

Additional monitoring, if any:

Interim Report: Program Alignment and Assessment, Due May 31, 2019, to include the articulation of expected student effort per credit hour in each syllabus, and to include evidence that supports the level of assigned credit for that course (and addresses other concerns from Core Component 3A, 4B, and 5D).

Institutional Records of Student Complaints

(See FCFI Questions 4–7 and Appendixes B and C)

1. Verify that the institution has documented a process for addressing student complaints and appears to be systematically processing such complaints, as evidenced by the data on student complaints since the last comprehensive evaluation.
 - Review the process that the institution uses to manage complaints, its complaints policy and procedure, and the history of complaints received and resolved since the last comprehensive evaluation by HLC.
 - Determine whether the institution has a process to review and resolve complaints in a timely manner.
 - Verify that the evidence shows that the institution can, and does, follow this process and that it is able to integrate any relevant findings from this process into improvements in services or in teaching and learning.
 - Advise the institution of any improvements that might be appropriate.
 - Consider whether the record of student complaints indicates any pattern of complaints or otherwise raises concerns about the institution's compliance with the Criteria for Accreditation or Assumed Practices.
2. Check the response that reflects the team's conclusions after reviewing this component of Federal Compliance:
 - ☐ The institution meets HLC's requirements.
 - ☒ The institution meets HLC's requirements, but additional monitoring is recommended.
 - ☐ The institution does not meet HLC's requirements and additional monitoring is recommended.
 - ☐ The Federal Compliance reviewer/evaluation team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion 2A.

Rationale:

The institution has provided data to indicate that, prior to December 2016, there was an informal procedure for receiving complaints, that it was communicated to students, that complaints were processed, and that the institution analyzed and used data to improve its processes.

The institution identified the need to establish a formal student complaint policy as a result of the self-study. The policy was adopted on December 6, 2016, and currently no documented evidence is presented to demonstrate that the institution has followed the policy and processes. Campus constituent conversations indicate that within each unit these conversations may be occurring. CSU-Pueblo would benefit from having formalized within-unit documentation and cross-unit discussions to discern areas for intervention and improvement. CSU-Pueblo is encouraged to develop a process where multiple campus constituents can review the pattern and nature of complaints to seek opportunities for

improving communications, processes, and policies. Additional monitoring is warranted to assure the implementation of this new policy and procedures.

Additional monitoring, if any:

Embedded Report: Student Complaint Policy, Processes, and Assessment – Embedded Monitoring within the Year 4 Comprehensive Evaluation of the recommended Standard Pathway. (Also addresses concerns from Core Component 2A and 5D)

Publication of Transfer Policies

(See FCFI Questions 8–10 and Appendixes D–F)

1. Verify that the institution has demonstrated it is appropriately disclosing its transfer policies to students and to the public. Policies should contain information about the criteria the institution uses to make transfer decisions.
 - Review the institution's transfer policies.
 - Review any articulation agreements the institution has in place, including articulation agreements at the institution level and for specific programs and how the institution publicly discloses information about those articulation agreements.
 - Consider where the institution discloses these policies (e.g., in its catalog, on its website) and how easily current and prospective students can access that information.
 - Determine whether the disclosed information clearly explains any articulation arrangements the institution has with other institutions. The information the institution provides to students should explain any program-specific articulation agreements in place and should clearly identify program-specific articulation agreements as such. Also, the information the institution provides should include whether the articulation agreement anticipates that the institution (1) accepts credits from the other institution(s) in the articulation agreement; (2) sends credits to the other institution(s) in the articulation agreements; (3) both offers and accepts credits with the institution(s) in the articulation agreement; and (4) what specific credits articulate through the agreement (e.g., general education only; pre-professional nursing courses only; etc.). Note that the institution need not make public the entire articulation agreement, but it needs to make public to students relevant information about these agreements so that they can better plan their education.
 - Verify that the institution has an appropriate process to align the disclosed transfer policies with the criteria and procedures used by the institution in making transfer decisions.
2. Check the response that reflects the team's conclusions after reviewing this component of Federal Compliance:
 - ☒ The institution meets HLC's requirements.
 - ☐ The institution meets HLC's requirements, but additional monitoring is recommended.
 - ☐ The institution does not meet HLC's requirements and additional monitoring is recommended.

- ☐ The Federal Compliance reviewer/evaluation team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Rationale:

The state of Colorado has a robust state-wide articulation and transfer of credit policy that supports clear, consistent communication of articulation agreements across both the public and private universities of the state. This information is easily accessed on the institution's web site. Students can access clear information about all existing transfer policies, articulation agreements, and the transfer of credit into specific programs offered at CSU-Pueblo. The processes align with criteria and procedures used by the institution to transfer credit.

Additional monitoring, if any:

None

Practices for Verification of Student Identity

(See FCFI Questions 11–16 and Appendix G)

1. Confirm that the institution verifies the identity of students who participate in courses or programs provided through distance or correspondence education. Confirm that it appropriately discloses additional fees related to verification to students, and that the method of verification makes reasonable efforts to protect students' privacy.
 - Determine how the institution verifies that the student who enrolls in a course is the same student who submits assignments, takes exams and earns a final grade. The team should ensure that the institution's approach respects student privacy.
 - Check that any costs related to verification (e.g., fees associated with test proctoring) and charged directly to students are explained to the students prior to enrollment in distance or correspondence courses.
2. Check the response that reflects the team's conclusions after reviewing this component of Federal Compliance:
 - ☒ The institution meets HLC's requirements.
 - ☐ The institution meets HLC's requirements, but additional monitoring is recommended.
 - ☐ The institution does not meet HLC's requirements and additional monitoring is recommended.
 - ☐ The Federal Compliance reviewer/evaluation team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Rationale:

The institution has a comprehensive policy that provides direction to programs and students regarding the verification of student identity. The institution provides students with a unique and secure institutional email address. The institution supports programs in offering proctored examinations, and provides students with free proctoring services if they utilize CSU-Pueblo facilities. The LMS enables remote proctoring as well. The institution provides clear communication to students regarding their responsibility to secure proctoring services, and about the expected costs of proctoring should the student choose not to access the institution's services. University of Colorado-Pueblo may want to continue to monitor emerging technologies for student identification, in the correspondence courses as well as their online courses.

Additional monitoring, if any:

None

Title IV Program Responsibilities

(See FCFI Questions 17–24 and Appendixes H–Q)

1. This requirement has several components the institution must address.
 - The team should verify that the following requirements are met:
 - **General Program Requirements.** The institution has provided HLC with information about the fulfillment of its Title IV program responsibilities, particularly findings from any review activities by the Department of Education. It has, as necessary, addressed any issues the Department has raised regarding the institution's fulfillment of its responsibilities.
 - **Financial Responsibility Requirements.** The institution has provided HLC with information about the Department's review of composite ratios and financial audits. It has, as necessary, addressed any issues the Department has raised regarding the institution's fulfillment of its responsibilities in this area. (Note that the team should also be commenting under Criterion 5 if an institution has significant issues with financial responsibility as demonstrated through ratios that are below acceptable levels or other financial responsibility findings by its auditor.)
 - **Default Rates.** The institution has provided HLC with information about its three-year default rate. It has a responsible program to work with students to minimize default rates. It has, as necessary, addressed any issues the Department has raised regarding the institution's fulfillment of its responsibilities in this area. Note that for 2012 and thereafter, institutions and teams should be using the three-year default rate based on revised default rate data published by the Department in September 2012; if the institution does not provide the default rate for three years leading up to the comprehensive evaluation visit, the team should contact the HLC staff.
 - **Campus Crime Information, Athletic Participation and Financial Aid, and Related Disclosures.** The institution has provided HLC with information about its disclosures. It has demonstrated, and the team has reviewed, the institution's policies and practices for ensuring compliance with these regulations.

- **Student Right to Know/Equity in Athletics.** The institution has provided HLC with information about its disclosures. It has demonstrated, and the team has reviewed, the institution's policies and practices for ensuring compliance with these regulations. The disclosures are accurate and provide appropriate information to students. (Note that the team should also be commenting under Criterion 2, Core Component 2.A if the team determines that the disclosures are not accurate or appropriate.)
 - **Satisfactory Academic Progress and Attendance Policies.** The institution has provided HLC with information about its policies and practices for ensuring compliance with these regulations. The institution has demonstrated that the policies and practices meet state or federal requirements and that the institution is appropriately applying these policies and practices to students. In most cases, teams should verify that these policies exist and are available to students, typically in the course catalog or student handbook and online. Note that HLC does not necessarily require that the institution take attendance unless required to do so by state or federal regulations but does anticipate that institutional attendance policies will provide information to students about attendance at the institution.
 - **Contractual Relationships.** The institution has presented a list of its contractual relationships related to its academic programs and evidence of its compliance with HLC policies requiring notification or approval for contractual relationships. (If the team learns that the institution has a contractual relationship that may require HLC approval and has not received HLC approval, the team must require that the institution complete and file the change request form as soon as possible. The team should direct the institution to review the Substantive Change Application for Programs Offered Through Contractual Arrangements on HLC's website for more information.)
 - **Consortial Relationships.** The institution has presented a list of its consortial relationships related to its academic programs and evidence of its compliance with HLC policies requiring notification or approval for consortial relationships. (If the team learns that the institution has a consortial relationship that may require HLC approval and has not received HLC approval, the team must require that the institution complete and file the form as soon as possible. The team should direct the institution to review the Substantive Change Application for Programs Offered Through Consortial Arrangements on HLC's website for more information.)
- Review all of the information that the institution discloses having to do with its Title IV program responsibilities.
 - Determine whether the Department has raised any issues related to the institution's compliance or whether the institution's auditor has raised any issues in the A-133 about the institution's compliance, and also look to see how carefully and effectively the institution handles its Title IV responsibilities.
 - If the institution has been cited or is not handling these responsibilities effectively, indicate that finding within the Federal Compliance portion of the team report and whether the institution appears to be moving forward with the corrective action that the Department has determined to be appropriate.

- If issues have been raised concerning the institution's compliance, decide whether these issues relate to the institution's ability to satisfy the Criteria for Accreditation, particularly with regard to whether its disclosures to students are candid and complete and demonstrate appropriate integrity (*Core Components 2.A and 2.B*).
2. Check the response that reflects the team's conclusions after reviewing this component of Federal Compliance:
- ☐ The institution meets HLC's requirements.
 - ☒ The institution meets HLC's requirements, but additional monitoring is recommended.
 - ☐ The institution does not meet HLC's requirements and additional monitoring is recommended.
 - ☐ The Federal Compliance reviewer/evaluation team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion 2.A).

Rationale:

General Responsibilities: The institution has provided HLC with documentation of DE review of its performance of its general responsibilities for administering Title IV. These reports indicate that a comprehensive review was conducted by the Department of Education. Nine findings were identified, four of which were addressed at the time of the review. The Department of Education presented a final report that indicated that all findings were now closed. The evidence indicates that the institution's response was adequate, and does not relate to the ability of the institution to demonstrate integrity or provide candid disclosures to students.

Financial Responsibilities: The institution, in its assurance argument, provided evidence of meeting financial responsibility based on composite ratios and the most recent audits. Auditors in 2014 identified two material weaknesses specific to CSU-Pueblo, and an additional two material weaknesses in 2015. Only one was determined to have been addressed and tested in the 2016 system-wide state audit. The 2015-16 state audit findings focus on adequate training of staff in the use of the Power FAIDS system to assure timely automated notification to students of the status of their aid.

Conversations with the Financial Aid office personnel indicate that they have implemented a series of checklists and cross-training of staff to ensure that all federal financial communications and reports are filed in a timely manner. A review of these processes provides evidence that the changes made will ameliorate these concerns. However, given the nature and the consistent concerns within the annual audits, a review of CSU-Pueblo's compliance with Title IV funds is an appropriate focus in the recommended Four-Year Assurance Review would be appropriate.

Default Rates: Evidence indicates that the default rate is consistent with national averages for the type of institution and population served.

Campus Crime, Athletic Participation, and Financial Aid: Evidence provide by the institution and verified via review of the website indicates that students have access to the Clery Report and to a continually updated accounting of campus crime as reported to the campus police and the Pueblo County Sheriff's Office. The website provides public access to the institution's filings with the NCAA re: Title IX compliance, and the website provides

extensive information and tools to students relative to financial aid. Policies related to financial aid are available directly on the Financial Aid site, and are also present in the searchable policy page on the President's site.

Student Right to Know and Athletic Participation: Evidence provided by the institution and verified via review of the website indicates that students have direct access to the College Scorecard and to National Clearinghouse Campus Navigator information via the Institutional Research Office's "Student Outcomes" site. This information is accessible, but it is dispersed throughout the website.

Satisfactory Progress and Attendance: Policies governing satisfactory progress and attendance are provided. Evidence from independent audit of financial aid accounting indicates that administration of the policy via PowerFAIDS will require improved staff training and increase internal oversight of Student Work Study program. Communications with the Financial Aid Office personnel reveal that processes and procedures have been implemented to ameliorate this concern.

The institution states that it has no contractual or consortial relationships as defined by HLC. Review of evidence on the website and in the Assurance Argument supports the claim.

Additional monitoring, if any:

Embedded Report: Title IV Program Responsibilities – Embedded Monitoring within the Year 4 Comprehensive Evaluation of the recommended Standard Pathway. Specifically, the report should monitor financial requirements, looking carefully at audited findings and material weaknesses to ensure that the processes and procedures recently articulated have provided a sustainable and continuing mechanism to meet these requirements. (Addresses concerns within Core Component 2A; Additional interim information is requested to complement the May 31, 2019 interim report with Core Component 5A).

Required Information for Students and the Public

(See FCFI Questions 25–27 and Appendixes R and S)

1. Verify that the institution publishes accurate, timely and appropriate information on institutional programs, fees, policies and related required information. Verify that the institution provides this required information in the course catalog and student handbook and on its website.
2. Check the response that reflects the team's conclusions after reviewing this component of Federal Compliance:
 - ☒ The institution meets HLC's requirements.
 - ☐ The institution meets HLC's requirements, but additional monitoring is recommended.
 - ☐ The institution does not meet HLC's requirements and additional monitoring is recommended.
 - ☐ The Federal Compliance reviewer/evaluation team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Rationale:

A review of the website, Fact Book, course catalog and student handbook (Pack Guide) provides evidence that accurate, timely and appropriate information on fees and programs is provided. Information on policies is provided via a link on the President's page, and this is searchable. Policy updates as recent as December 2016 are posted on the site.

Additional monitoring, if any:

None

Advertising and Recruitment Materials and Other Public Information

(See FCFI Questions 28–31 and Appendixes T and U)

1. Verify that the institution has documented that it provides accurate, timely and appropriately detailed information to current and prospective students and the public about its accreditation status with HLC and other agencies as well as about its programs, locations and policies.
 - Review the institution's disclosure about its accreditation status with HLC to determine whether the information it provides is accurate, complete and appropriately formatted and contains HLC's web address.
 - Review the institution's disclosures about its relationship with other accrediting agencies for accuracy and for appropriate consumer information, particularly regarding the link between specialized/professional accreditation and the licensure necessary for employment in many professional or specialized areas.
 - Review the institution's catalog, brochures, recruiting materials, website and information provided by the institution's advisors or counselors to determine whether the institution provides accurate, timely and appropriate information to current and prospective students about its programs, locations and policies.
 - Verify that the institution correctly displays the Mark of Affiliation on its website.
2. Check the response that reflects the team's conclusions after reviewing this component of Federal Compliance:
 - ☒ The institution meets HLC's requirements.
 - ☐ The institution meets HLC's requirements, but additional monitoring is recommended.
 - ☐ The institution does not meet HLC's requirements and additional monitoring is recommended.
 - ☐ The Federal Compliance reviewer/evaluation team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Rationale:

The institution posts the Mark of Affiliation on its website. CSU-Pueblo's information about its relationship with HLC is accurate, appropriately formatted, and contains the correct address. Disclosures about relationships with other accrediting bodies is also accurate and provides direct links to the websites and reports of the accrediting bodies themselves. The website has undergone significant restructure since Fall 2016 to provide accurate, timely and appropriate information to students. All published materials reviewed also provide clear and accurate information.

Additional monitoring, if any:

None

Review of Student Outcome Data

(See FCFI Questions 32–35 and Appendix V)

1. Review the student outcome data the institution collects to determine whether they are appropriate and sufficient based on the kinds of academic programs the institution offers and the students it serves.
 - Determine whether the institution uses this information effectively to make decisions about planning, academic program review, assessment of student learning, consideration of institutional effectiveness and other topics.
 - Review the institution's explanation of its use of information from the College Scorecard, including student retention and completion and the loan repayment rate.
2. Check the response that reflects the team's conclusions after reviewing this component of Federal Compliance:
 - ☐ The institution meets HLC's requirements.
 - ☒ The institution meets HLC's requirements, but additional monitoring is recommended.
 - ☐ The institution does not meet HLC's requirements and additional monitoring is recommended.
 - ☐ The Federal Compliance reviewer/evaluation team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Rationale:

The institution provides evidence in its appendices that information about student learning outcomes (graduation, retention, post-graduate outcomes) is used effectively in academic planning and program review.

Evidence from multiple sources, including the "Assessment" web page, review of syllabi, program assessment reports, and special program accreditation reports, indicates that the institution has addressed data collection and analysis of student learning assessment data, but is still evolving in its capacity to use this evidence to inform decision-making across all programs and modes of delivery.

The College Catalog articulates student performance outcomes for programs and also that differentiate between undergraduate- and graduate-level learning. Syllabi for courses within those programs are inconsistent in providing goals, objectives, and outcomes. Syllabi from multiple instructors or multiple modalities are inconsistent and do not reflect that the program faculty have articulated clear expectations for courses, or how those courses align strategically to produce the program learning outcomes. Syllabi also do not differentiate between undergraduate and graduate learning outcomes or learning assessment measures. Student learning outcomes that articulate the core measurable expectations of student knowledge, skills, and appropriate levels of critical thinking provide a means for a discipline to evaluate the effectiveness of student learning and professional growth during their academic program. The careful assessment of appropriate data, coupled with external measures of program effectiveness, can guide program improvement at the course and program level, ensuring currency, relevancy, consistency, and appropriate scaffolding in learning expectations and outcomes. CSU-Pueblo should ensure that the public documents shared with students clearly articulate the expected learning, assessment measures, and articulation of courses within the program of learning.

Additional monitoring, if any:

Interim Monitoring Report: Program Alignment and Assessment. Due May 31, 2019 to include an analysis of syllabi for articulation of common expectations for learning in all courses regardless of instructor or modality, methods of differentiating undergraduate and graduate learning and assessment of that learning, and articulation of how individual required courses stratify and align to result in the program learning outcomes. The report should evaluate student learning outcomes in programs and courses within those programs, as well as use of external data in evaluating and improving program quality and effectiveness. Assessment efforts should also document how these data were used in the assessment decision making processes. (Also addresses concerns within Core Components 3A, 4B, and 5D)

Publication of Student Outcome Data

(See FCFI Questions 36–38)

1. Verify that the institution makes student outcome data available and easily accessible to the public. Data may be provided at the institutional or departmental level or both, but the institution must disclose student outcome data that address the broad variety of its programs.
 - Verify that student outcome data are made available to the public on the institution's website—for instance, linked to from the institution's home page, included within the top three levels of the website or easily found through a search of related terms on the website—and are clearly labeled as such.
 - Determine whether the publication of these data accurately reflects the range of programs at the institution.
2. Check the response that reflects the team's conclusions after reviewing this component of Federal Compliance:
 - ☒ The institution meets HLC's requirements.
 - ☐ The institution meets HLC's requirements, but additional monitoring is recommended.

- ☐ The institution does not meet HLC's requirements and additional monitoring is recommended.
- ☐ The Federal Compliance reviewer/evaluation team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Rationale:

The institution makes Student Outcome Data available via the website, linked to the "Academics" tab on the home page. A CSU-Pueblo website search of student outcomes or assessment will take you to this site. Data is presented by both Institutional Research and Assessment divisions. "Institutional Research" presents comprehensive trend data relative to IPEDS reporting categories for student outcomes; "Assessment" presents information regarding institutional assessment of student learning outcomes in general education and in academic programs. These data are presented in clear, easy to read formats, with explanatory statements to help the viewer understand their meaning. The publications represent all programs offered.

Additional monitoring, if any:

None

Standing With State and Other Accrediting Agencies

(See FCFI Questions 39–40 and Appendixes W and X)

1. Verify that the institution discloses accurately to the public and HLC its relationship with any other specialized, professional or institutional accreditors and with all governing or coordinating bodies in states in which the institution may have a presence.

The team should consider any potential implications for accreditation by HLC of a sanction or loss of status by the institution with any other accrediting agency or of loss of authorization in any state.

Note: If the team is recommending initial or continued status, and the institution is now or has been in the past five years under sanction or show-cause with, or has received an adverse action (i.e., withdrawal, suspension, denial or termination) from, any other federally recognized specialized or institutional accreditor or a state entity, then the team must explain the sanction or adverse action of the other agency in the body of the assurance section of the team report and provide its rationale for recommending HLC status in light of this action.

- Review the list of relationships the institution has with all other accreditors and state governing or coordinating bodies, along with the evaluation reports, action letters and interim monitoring plans issued by each accrediting agency.
- Verify that the institution's standing with state agencies and accrediting bodies is appropriately disclosed to students.
- Determine whether this information provides any indication about the institution's capacity to meet HLC's Criteria for Accreditation. Should the team learn that the institution is at risk

of losing, or has lost, its degree or program authorization in any state in which it meets state presence requirements, it should contact the HLC staff liaison immediately.

2. Check the response that reflects the team's conclusions after reviewing this component of Federal Compliance:

- ☐ The institution meets HLC's requirements.
- ☒ The institution meets HLC's requirements, but additional monitoring is recommended.
- ☐ The institution does not meet HLC's requirements and additional monitoring is recommended.
- ☐ The Federal Compliance reviewer/evaluation team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion 4A.5 and 4B.1 and 2.

Rationale:

In the period from 2014 to 2016, two accrediting bodies have identified deficiencies or areas requiring close monitoring relating to systematic processes of student learning outcome assessment and the use of evidence to improve both curriculum and learning outcomes. In July 2016 NASM deferred action on the Music program's application for renewal, referring to several items relating to program mission and adequacy of resources. The baccalaureate nursing program has been placed on conditions as of March 2016, and must address non-compliance with regards to faculty qualifications and assessment of learning. Failure to address the conditions will result in a loss of accreditation and subsequent loss of state approval.

The repeated citation of concerns regarding systematic assessment of student learning and use of evidence by multiple accrediting bodies warrants monitoring to assure that the Criteria for Accreditation continue to be met.

.

Additional monitoring, if any:

Interim Monitoring Report: Program Alignment and Assessment – Due May 31, 2019, to include progress on addressing deficiencies and conditions relating to Criterion 4B that have been cited by specialized accrediting bodies requiring action by 2018. (Also addresses concerns within Core Components 3A, 4B, and 5D)

Public Notification of Opportunity to Comment (FCFI Questions 41–43 and Appendix Y)

1. Verify that the institution has made an appropriate and timely effort to solicit third-party comments. The team should evaluate any comments received and complete any necessary follow-up on issues raised in these comments.

Note: If the team has determined that any issues raised by third-party comments relate to the team's review of the institution's compliance with the Criteria for Accreditation, it must discuss this information and its analysis in the body of the assurance section of the team report.

- Review information about the public disclosure of the upcoming visit, including copies of the institution's notices, to determine whether the institution made an appropriate and timely effort to notify the public and seek comments.
 - Evaluate the comments to determine whether the team needs to follow up on any issues through its interviews and review of documentation during the visit process.
2. Check the response that reflects the team's conclusions after reviewing this component of Federal Compliance:
- ☒ The institution meets HLC's requirements.
 - ☐ The institution meets HLC's requirements, but additional monitoring is recommended.
 - ☐ The institution does not meet HLC's requirements and additional monitoring is recommended.
 - ☐ The Federal Compliance reviewer/evaluation team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Rationale:

The institution initiated a campaign to inform external and internal constituents of the opportunity to comment in late September 2016. An external press release was published in local newspapers, including the Pueblo Chieftain, and in regular communications with the alumni and donor community. This notice was also made available to students, and broadcast via Facebook and Twitter. A running tally of views indicates that at least 500 people viewed this information via those pathways.

Additional monitoring, if any:

None

Competency-Based Programs Including Direct Assessment Programs/Faculty-Student Engagement

(See FCFI Questions 44–47)

1. Verify that students and faculty in any direct assessment or competency-based programs offered by the institution have regular and substantive interactions: the faculty and students communicate on some regular basis that is at least equivalent to contact in a traditional classroom, and that in the tasks mastered to assure competency, faculty and students interact about critical thinking, analytical skills, and written and oral communication abilities, as well as about core ideas, important theories, current knowledge, etc. (Also, confirm that the institution has explained the credit hour equivalencies for these programs in the credit hour sections of the Federal Compliance Filing.)

- Review the list of direct assessment or competency-based programs offered by the institution.
 - Determine whether the institution has effective methods for ensuring that faculty in these programs regularly communicate and interact with students about the subject matter of the course.
 - Determine whether the institution has effective methods for ensuring that faculty and students in these programs interact about key skills and ideas in the students' mastery of tasks to assure competency.
2. Check the response that reflects the team's conclusions after reviewing this component of Federal Compliance:
- ☐ The institution meets HLC's requirements.
 - ☐ The institution meets HLC's requirements, but additional monitoring is recommended.
 - ☐ The institution does not meet HLC's requirements and additional monitoring is recommended.
 - ☐ The Federal Compliance reviewer/evaluation team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Rationale:

The institution does not offer competency-based programs.

Additional monitoring, if any:

Institutional Materials Related to Federal Compliance Reviewed by the Team

Provide a list of materials reviewed here:

A. Federal Compliance Filing by the Institution

B. Appendix A Credit Hour Worksheet

C. Revised Appendix A Credit Hour Worksheet

D. Appendices B-Y

E. Supplements A1-B3

F. Sampled Syllabi (listed by course, with multiple semesters, modalities, and instructors indicated)

1. ACCTG 510 Managerial Accounting Spring 2016, Fall 2016 (hybrid)
2. AIM 345 Advanced Automotive Systems Fall 2016
3. AT 232 First Aid Fall 2016
4. BBE 460/560 English Language Learner Assessment and Administration Fall 2015
5. CHEM 412/512 Biochemistry II Spring 2016
6. BIOL 100 Principles of Biology Spring 2016, Summer 2016, and Fall 2016 (7 different instructors; residential campus and high-school offered dual credit)
7. BIOL 100L Principles of Biology Lab Spring 2016, Summer 2016, and Fall 2016 (7 different instructors; residential campus and high-school offered dual credit)
8. BIOL 121 Environmental Conservation Fall 2016
9. BIOL 201 Botany Spring 2016
10. BIOL 301 General Microbiology, Fall 2016
11. BIOL 301L General Microbiology Lab, Fall 2016
12. BIOL 352 Evolutionary Biology & Ecology Spring 2016
13. BIOL 412/512 Cell Biology Spring 2016
14. BIOL 453/553 Ecology, Fall 2016
15. BIOL 453L/553L Ecology Field Studies Fall 2015
16. BIOL 465/565 Environmental Toxicology Fall 2016
17. BUSAD 265 Inferential Statistics and Problem Solving Fall 2016
18. CS/SW 230 Social and Psychological Health of the Chicano Fall 2016
19. CIS 100-105 Fall 2016 (Note: This syllabus is described as a common syllabus for 5 1 credit courses. This is a listing of those courses: a) CIS 100 Introduction to Word; b) CIS 103 PowerPoint and Web Publishing; c) CIS 104 Excel Spreadsheets; and d) CIS 105 MS Access DBMS. No fifth course is identified.
20. ED202 Foundations of Education Fall 2016 (3 different instructors; one on-line, one at the residential campus, and one high-school offered dual credit)
21. ED 545 Assessment and Data Driven Instruction Fall 2015
22. EN441 Engineering of Manufacturing Processes Spring 2016
23. EN471/571 Facility Planning and Design Fall 2016
24. ENG 102 Composition II Summer 2016, Fall 2016 (13 different instructors; includes residential campus, high-school offered dual credit, and correspondence/Independent Study)
25. EXHP 162 Personal Health & Wellness Fall 2016 (2 instructors; one offered on the residential campus and one on-line)
26. EXHP 162L Personal Health Lab Fall 2016 (3 instructors)
27. EXHP 492 Research in Exercise Science and Health Promotion Spring 2016
28. MATH427 Abstract Algebra Spring 2016
29. MGMT 540 Managing Human Resources Fall 2016
30. MUS 135/230/330/430/530 ThunderWolves Marching Band Fall 2016
31. PHYS 110 Introductory Astronomy Summer 2016, Fall 2016
32. PSYCH 351 Psychology of the Exceptional Individual Fall 2016
33. SOC 101 – Introduction to Sociology Fall 2016 (3 instructors, offered on the residential campus, online, and through correspondence/independent study)
34. SOC 203 Criminal Justice System Fall 2016 (2 instructors; one on residential campus and one through correspondence/independent study)

35. SOC 310 Social & Cultural Theory Fall 2016 (2 instructors; one on residential campus and on through correspondence/independent study)

G. CSU-Pueblo Websites (other than those cited in the appendices)

1. CSU Pueblo Credit Hour Policy <http://csu-pueblo-policies.colostate.edu/policy.aspx?id=123>
2. CSU Pueblo Student Verification and Identification Policy <http://csu-pueblo-policies.colostate.edu/policy.aspx?id=129>
3. Clery Report 2015-16: <https://www.csupueblo.edu/campus-safety/>
4. Budget Central: <https://www.csupueblo.edu/vice-president-of-finance-and-administration/budget-central/index.html>
5. Institutional and Academic Program Assessment Results and Reports: <https://www.csupueblo.edu/assessment-and-student-learning/results-and-reports.html>
6. Institutional Research and Analysis: <https://www.csupueblo.edu/institutional-research/index.html>
7. Fact Books: <https://www.csupueblo.edu/institutional-research/fact-book.html>
8. Surveys: <https://www.csupueblo.edu/institutional-research/surveys/index.html>
9. Teacher Education Program Courses and Syllabi: <https://www.csupueblo.edu/teacher-education-program/syllabi.html>
10. Graduate Studies: <https://www.csupueblo.edu/graduate-studies/natural-sciences/index.html>

H. Evidence in the Assurance Argument

1. HLC Documents File (All)
2. Component 2B
 - a. CDS Section H Financial Aid
 - b. Budget Guidelines and Procedures
3. Component 5A
 - a. Composite Financial Indices 2013-15
 - b. Colorado State Assembly Audits 2014, 15 and 16



FORM

Team Worksheet for Evaluating an Institution's Assignment of Credit Hours and Clock Hours

Institution Under Review: Colorado State University - Pueblo

Review the *Worksheet for Institutions on the Assignment of Credit Hours and Clock Hours*, including all supplemental materials. Applicable sections and supplements are referenced in the corresponding sections and questions below.

Part 1. Institutional Calendar, Term Length and Type of Credit

Instructions

Review Section 1 of Appendix A. Verify that the institution has calendar and term lengths within the range of good practice in higher education.

Responses

A. Answer the Following Question

1. Are the institution's calendar and term lengths, including non-standard terms, within the range of good practice in higher education? Do they contribute to an academic environment in which students receive a rigorous and thorough education?

☒ Yes ☐ No

Comments:

The institution operates two 15-week semesters (Fall and Spring), and one 12-week summer semester. Select, individual courses are offered in a compressed format of 4 and 8 week sessions during the Fall and Spring semesters. The summer semester is 12 weeks in length, with defined starts for 4-week sessions, 6-week session, and 12 week sessions. .

B. Recommend HLC Follow-Up, If Appropriate

Is any HLC follow-up required related to the institution's calendar and term length practices?

☐ Yes ☒ No

Rationale:

The calendar and term length are consistent with long-standing practice in higher education. The policy and practice on the assignment of credit hours demonstrates that the institution offers curriculum in multiple formats within the semester structure.

Identify the type of HLC monitoring required and the due date:

Part 2. Policy and Practices on Assignment of Credit Hours

Instructions

Review Sections 2–4 of the *Worksheet for Institutions on the Assignment of Credit Hours and Clock Hours*, including supplemental materials as noted below. In assessing the appropriateness of the credit allocations provided by the institution the team should complete the following steps. The outcomes of the team's review should be reflected in its responses below.

1. **Format of Courses and Number of Credits Awarded.** Review the *Form for Reporting an Overview of Credit Hour Allocations and Instructional Time for Courses* (Supplement A1 to the *Worksheet for Institutions*) completed by the institution, which provides an overview of credit hour assignments across institutional offerings and delivery formats.
2. Scan the course descriptions in the catalog and the number of credit hours assigned for courses in different departments at the institution (see Supplements B1 and B2 to *Worksheet for Institutions*, as applicable).
 - At semester-based institutions courses will be typically be from two to four credit hours (or approximately five quarter hours) and extend approximately 14–16 weeks (or approximately 10 weeks for a quarter). The descriptions in the catalog should reflect courses that are appropriately rigorous and have collegiate expectations for objectives and workload. Identify courses/disciplines that seem to depart markedly from these expectations.
 - Institutions may have courses that are in compressed format, self-paced, or otherwise alternatively structured. Credit assignments should be reasonable. (For example, as a full-time load for a traditional semester is typically 15 credits, it might be expected that the norm for a full-time load in a five-week term is 5 credits; therefore, a single five-week course awarding 10 credits would be subject to inquiry and justification.)
 - Teams should be sure to scan across disciplines, delivery mode and types of academic activities.
 - Federal regulations allow for an institution to have two credit-hour awards: one award for Title IV purposes and following the federal definition and one for the purpose of defining

progression in and completion of an academic program at that institution. HLC procedure also permits this approach.

3. Scan course schedules to determine how frequently courses meet each week and what other scheduled activities are required for each course (see Supplement B3 to *Worksheet for Institutions*). Pay particular attention to alternatively structured or other courses completed in a short period of time or with less frequently scheduled interaction between student and instructor that have particularly high credit hour assignments.
4. Sampling. Teams will need to sample some number of degree programs based on the headcount at the institution and the range of programs it offers.
 - For the programs sampled, the team should review syllabi and intended learning outcomes for several courses, identify the contact hours for each course, and review expectations for homework or work outside of instructional time.
 - At a minimum, teams should anticipate sampling at least a few programs at each degree level.
 - For institutions with several different academic calendars or terms or with a wide range of academic programs, the team should expand the sample size appropriately to ensure that it is paying careful attention to alternative format and compressed and accelerated courses.
 - Where the institution offers the same course in more than one format, the team is advised to sample across the various formats to test for consistency.
5. **Direct Assessment or Competency-Based Programs.** Review the information provided by the institution regarding any direct assessment or competency-based programs that it offers, with regard to the learning objectives, policies and procedures for credit allocation, and processes for review and improvement in these programs.
6. **Policy on Credit Hours and Total Credit Hour Generation.** With reference to the institutional policies on the assignment of credit provided in Supplement A2 to *Worksheet for Institutions*, consider the following questions:
 - Does the institution's policy for awarding credit address all the delivery formats employed by the institution?
 - Does that policy address the amount of instructional or contact time assigned and homework typically expected of a student with regard to credit hours earned?
 - For institutions with courses in alternative formats or with less instructional and homework time than would be typically expected, does that policy also equate credit hours with intended learning outcomes and student achievement that could be reasonably achieved by a student in the time frame allotted for the course?

- Is the policy reasonable within the federal definition as well as within the range of good practice in higher education? (Note that HLC will expect that credit hour policies at public institutions that meet state regulatory requirements or are dictated by the state will likely meet federal definitions as well.)
 - If so, is the institution's assignment of credit to courses reflective of its policy on the award of credit?
 - Do the number of credits taken by typical undergraduate and graduate students, as well as the number of students earning more than the typical number of credits, fall within the range of good practice in higher education?
7. If the answers to the above questions lead the team to conclude that there may be a problem with the credit hours awarded the team should recommend the following:
- If the problem involves a poor or insufficiently detailed institutional policy, the team should call for a revised policy as soon as possible by requiring a monitoring report within no more than one year that demonstrates the institution has a revised policy and provides evidence of implementation.
 - If the team identifies an application problem and that problem is isolated to a few courses or a single department, division or learning format, the team should call for follow-up activities (a monitoring report or focused evaluation) to ensure that the problems are corrected within no more than one year.
 - If the team identifies systematic noncompliance across the institution with regard to the award of credit, the team should notify the HLC staff immediately and work with staff members to design appropriate follow-up activities. HLC shall understand systematic noncompliance to mean that the institution lacks any policies to determine the award of academic credit or that there is an inappropriate award of institutional credit not in conformity with the policies established by the institution or with commonly accepted practices in higher education across multiple programs or divisions or affecting significant numbers of students.

Worksheet on Assignment of Credit Hours

A. Identify the Sample Courses and Programs Reviewed by the Team

1. AIM 345 Advanced Automotive Systems Fall 2016
2. AT 232 First Aid Fall 2016
3. BIOL 121 Environmental Conservation Fall 2016
4. BUSAD 265 Inferential Statistics and Problem Solving Fall 2016
5. CS/SW 230 Social and Psychological Health of the Chicano Fall 2016
6. CIS 100-105 Fall 2016 (Note: This syllabus is described as a common syllabus for 5 1 credit courses. This is a listing of those courses: a) CIS 100 Introduction to Word; b) CIS

103 PowerPoint and Web Publishing; c) CIS 104 Excel Spreadsheets; and d) CIS 105 MS Access DBMS. No fifth course is identified.

7. ENG 102 Composition II Summer 2016
8. PSYCH 351 Psychology of the Exceptional Individual Fall 2016
9. EXHP 492 Research in Exercise Science and Health Promotion Spring 2016
10. ED 545 Assessment and Data Driven Instruction Fall 2015
11. BBE 460/560 English Language Learner Assessment and Administration (no date)

B. Answer the Following Questions

1. Institutional Policies on Credit Hours

- a. Does the institution's policy for awarding credit address all the delivery formats employed by the institution? (Note that for this question and the questions that follow an institution may have a single comprehensive policy or multiple policies.)

☒ Yes ☐ No

Comments:

The institution's credit hour policy addresses all delivery formats offered by the institution. Credit is assigned based on 750 minutes in-class and 1500 minutes out-of-class work minimum per credit hour at the undergraduate level. Graduate credit is assigned at 750 minutes in-class and 2250 minutes out-of-class work per credit hour. Alternative delivery formats are clearly identified, and equivalent credit is assigned based on clear descriptions of student learning experiences and expected outcomes.

- b. Does that policy relate the amount of instructional or contact time provided and homework typically expected of a student to the credit hours awarded for the classes offered in the delivery formats offered by the institution? (Note that an institution's policy must go beyond simply stating that it awards credit solely based on assessment of student learning and should also reference instructional time.)

☒ Yes ☐ No

Comments:

The policy provides a clear and comprehensive description of the learning experiences and expected outcomes associated with the assignment of credit for all delivery formats.

- c. For institutions with non-traditional courses in alternative formats or with less instructional and homework time than would be typically expected, does that policy equate credit hours with intended learning outcomes and student achievement that could be reasonably achieved by a student in the time frame and utilizing the activities allotted for the course?

☒ Yes ☐ No

Comments:

- d. Is the policy reasonable within the federal definition as well as within the range of good practice in higher education? (Note that HLC will expect that credit hour policies at public institutions that meet state regulatory requirements or are dictated by the state will likely meet federal definitions as well.)

☒ Yes

☐ No

Comments:

The assignment of credit policy is based on federal guidelines. It is expressed in terms of contact minutes versus hours. The assignment of credit hours is consistent with the Colorado Department of Higher Education's policies for approval of new academic programs, review of academic programs, academic program approval, required review for substantive change, and annual review of academic planning. These policies require compliance with the policies of the federal government and the requirements of regional accrediting bodies.

2. Application of Policies

- a. Are the course descriptions and syllabi in the sample academic programs reviewed by the team appropriate and reflective of the institution's policy on the award of credit? (Note that HLC will expect that credit hour policies at public institutions that meet state regulatory requirements or are dictated by the state will likely meet federal definitions as well.)

☐ Yes

☒ No

Comments:

A review of a sample of eleven representative syllabi provides evidence of variation both within and between programs in the fidelity of the course description provided in the catalog, in reports on assessment of student learning, and that provided in the course syllabus. There is also variation both within and between programs in the information presented to students regarding learning outcomes and expected coursework, and the relationship between outcomes, coursework, and course credit. The credit hour policy was adopted in August 2016; the Visiting Team will need to clarify the process for verifying the appropriateness of learning outcomes and the relationship between course expectations and the award of credit.

- b. Are the learning outcomes in the sample reviewed by the team appropriate to the courses and programs reviewed and in keeping with the institution's policy on the award of credit?

☐ Yes

☒ No

Comments:

A review of a sample of eleven syllabi representative of the general education curriculum, the diverse majors, and all degree levels indicates that learning outcomes are not consistently identified in syllabi. Learning outcomes were clearly identified in 6 of the 11 syllabi under review. Outcomes were referenced but not specified in one syllabus. Course outlines are not consistently provided in all syllabi. I was not able to verify that learning outcomes are consistently appropriate or in keeping with the institution's policy based on this review.

- c. If the institution offers any alternative-delivery or compressed-format courses or programs, are the course descriptions and syllabi for those courses appropriate and reflective of the institution's policy on the award of academic credit?

☐ Yes ☒ No

Comments:

The review of syllabi indicates that there is no standard expectation for the form of the syllabus, or the types of information that should be included. I am not able to verify, through the review of alternative and compressed format course syllabi, either the appropriateness of outcomes or adherence to the institution's policy on the award of credit.

- d. If the institution offers alternative-delivery or compressed-format courses or programs, are the learning outcomes reviewed by the team appropriate to the courses and programs reviewed and in keeping with the institution's policy on the award of credit? Are the learning outcomes reasonable for students to fulfill in the time allocated, such that the allocation of credit is justified?

☐ Yes ☒ No

Comments:

The review of syllabi indicates that there is no standard expectation for the form of the syllabus, or the types of information that should be included. I am not able to verify, through the review of alternative and compressed format course syllabi, either the appropriateness of outcomes or adherence to the institution's policy on the award of credit

- e. Is the institution's actual assignment of credit to courses and programs across the institution reflective of its policy on the award of credit and reasonable and appropriate within commonly accepted practice in higher education?

☒ Yes ☐ No

Comments:

Although the sample of syllabi reviewed does not provide sufficient evidence to verify that learning outcomes and course activities are reflective of the institution's policy, the actual assignment of credit to courses is reflective of the policy in terms of in-class and out-of-class contact minutes.

C. Recommend HLC Follow-up, If Appropriate

Review the responses provided in this worksheet. If the team has responded “no” to any of the questions above, the team will need to assign HLC follow-up to assure that the institution comes into compliance with expectations regarding the assignment of credit hours.

Is any HLC follow-up required related to the institution’s credit hour policies and practices?

☒ Yes ☐ No

Rationale:

The institution’s credit hour policy was adopted on August 2, 2016. A review of a representative sample of Fall 2016 syllabi does not provide sufficient information regarding learning outcomes and the relationship of course work to the award of credit to verify appropriateness or compliance with credit hour policy. The actual assignment of credit hours is consistent to the in-class and out-of-class minutes per credit hour set forth in the policy. It is my conclusion that the institution has not yet fully revised syllabi to better reflect the requirements of the credit hour policy.

Identify the type of HLC monitoring required and the due date:

If the Visiting Team is not able to further verify that the institution is systematically applying the credit hour policy, I recommend that the institution be required to submit an interim report. The interim report will detail the process by which the institution verifies the appropriateness of learning outcomes and the award of credit for each course it offers. It must also provide a report on progress toward communicating outcomes and expectations to students via the course syllabus. The interim report must be submitted by March 7, 2018.

D. Systematic Noncompliance in One or More Educational Programs With HLC Policies Regarding the Credit Hour

Did the team find systematic noncompliance in one or more education programs with HLC policies regarding the credit hour?

☐ Yes ☒ No

Identify the findings:

Rationale:

While the review of the assignment of credit hours identified wide variation in the information provided in the syllabus in relation to expected engagement, work and performance in relation to the assigned credit, there is no evidence that this is either systematic within a program or actual assignment of credit that is not consistent with policy or with accepted practice across multiple programs. Thus the process by which the institution assures compliance is with the policy is not reflected in individual instructors’ course syllabi episodically within and across programs.

Part 3. Clock Hours

Instructions

Review Section 5 of *Worksheet for Institutions*, including Supplements A3–A6. Before completing the worksheet below, answer the following question:

Does the institution offer any degree or certificate programs in clock hours or programs that must be reported to the Department of Education in clock hours for Title IV purposes even though students may earn credit hours for graduation from these programs?

☐ Yes ☒ No

If the answer is “Yes,” complete the “Worksheet on Clock Hours.”

Note: This worksheet is not intended for teams to evaluate whether an institution has assigned credit hours relative to contact hours in accordance with the Carnegie definition of the credit hour. This worksheet solely addresses those programs reported to the Department of Education in clock hours for Title IV purposes.

Non-degree programs subject to clock hour requirements (for which an institution is required to measure student progress in clock hours for federal or state purposes or for graduates to apply for licensure) are not subject to the credit hour definitions per se but will need to provide conversions to semester or quarter hours for Title IV purposes. Clock hour programs might include teacher education, nursing or other programs in licensed fields.

Federal regulations require that these programs follow the federal formula listed below. If there are no deficiencies identified by the accrediting agency in the institution’s overall policy for awarding semester or quarter credit, the accrediting agency may provide permission for the institution to provide less instruction so long as the student’s work outside class in addition to direct instruction meets the applicable quantitative clock hour requirements noted below.

Federal Formula for Minimum Number of Clock Hours of Instruction (34 CFR §668.8):

1 semester or trimester hour must include at least 37.5 clock hours of instruction
1 quarter hour must include at least 25 clock hours of instruction

Note that the institution may have a lower rate if the institution’s requirement for student work outside of class combined with the actual clock hours of instruction equals the above formula provided that a semester/trimester hour includes at least 30 clock hours of actual instruction and a quarter hour includes at least 20 semester hours.

Worksheet on Clock Hours

A. Answer the Following Questions

1. Does the institution’s credit-to-clock-hour formula match the federal formula?

☐ Yes ☐ No

Comments:

2. If the credit-to-clock-hour conversion numbers are less than the federal formula, indicate what specific requirements there are, if any, for student work outside of class.

3. Did the team determine that the institution's credit hour policies are reasonable within the federal definition as well as within the range of good practice in higher education? (Note that if the team answers "No" to this question, it should recommend follow-up monitoring in section C below.)

☐ Yes ☐ No

Comments:

4. Did the team determine in reviewing the assignment of credit to courses and programs across the institution that it was reflective of the institution's policy on the award of credit and reasonable and appropriate within commonly accepted practice in higher education?

☐ Yes ☐ No

Comments:

B. Does the team approve variations, if any, from the federal formula in the institution's credit-to-clock-hour conversion?

☐ Yes ☐ No

C. Recommend HLC Follow-up, If Appropriate

Is any HLC follow-up required related to the institution's clock hour policies and practices?

☐ Yes ☐ No

Rationale:

Identify the type of HLC monitoring required and the due date:



Institutional Status and Requirements Worksheet

INSTITUTION and STATE:	Colorado State University-Pueblo, CO
TYPE OF REVIEW:	Open Pathway Comprehensive Evaluation
DESCRIPTION OF REVIEW:	Comprehensive evaluation to include a Federal Compliance Reviewer.
DATES OF REVIEW:	2/13/2017 - 2/14/2017

☐ No Change in Institutional Status and Requirements

Accreditation Status

Nature of Institution

Control: Public

Recommended Change: No Change

Degrees Awarded: Bachelors, Masters

Recommended Change: No Change

Reaffirmation of Accreditation:

Year of Last Reaffirmation of Accreditation: 2007 - 2008

Year of Next Reaffirmation of Accreditation: 2016 - 2017

Recommended Change: 2026-2027

Accreditation Stipulations

General:

The institution's approval to offer programs through CSU-Global Campus is limited to online baccalaureate degree completion programs.

Recommended Change: No Change

Additional Location:

Prior HLC approval required.

Recommended Change: No Change



Institutional Status and Requirements Worksheet

Distance and Correspondence Courses and Programs:

Approved for distance education courses and programs. Approved for correspondence education courses and programs.

Recommended Change: No Change

Accreditation Events

Accreditation Pathway

Open Pathway

Recommended Change: Limited to Standard Pathway

Upcoming Events

Monitoring

Upcoming Events

None

Recommended Change:

Interim Report due 5/31/2019: Program Alignment and Assessment; Adjunct Faculty Evaluations; and Fiscal Capacity and Sustainability.

Embedded Interim Report: Title IV Federal Compliance Process re: Student Complaint Policy and Process - to be Embedded in Next Year 4 Comprehensive Visit.

Institutional Data - No Change

Educational Programs		Recommended Change:
Undergraduate		
Certificate	7	_____
Associate Degrees	0	_____
Baccalaureate Degrees	28	_____
Graduate		
Master's Degrees	10	_____
Specialist Degrees	0	_____
Doctoral Degrees	0	_____

Extended Operations

Branch Campuses



Institutional Status and Requirements Worksheet

None

Recommended Change: No Change

Additional Locations

CSU-Pueblo at Colorado Springs , 2864 South Circle Drive, Colorado Springs, CO, 80906 - Active

Fort Carson, Fort Carson, Army Education Center, Colorado Springs, CO, 80903 - Active

Recommended Change: No Change

Distance Delivery

51.1601 - Nursing/Registered Nurse (RN, ASN, BSN, MSN), Master, Master of Science with a Major in Nursing (MS)

51.3801 - Registered Nursing/Registered Nurse, Bachelor, Registered Nurse to Bachelor of Science in Nursing Option (RN-BSN)

Recommended Change: No Change

Correspondence Education

45.01 - Social Sciences, General, Bachelor, BA, BS Social Science

45.11 - Sociology, Bachelor, BA, BS Sociology

Recommended Change: No Change

Contractual Arrangements

None

Recommended Change: No Change

Consortial Arrangements

None

Recommended Change: No Change
