



March 4, 2020

VIA ELECTRONIC MAIL

Mary Adams, President
American Sentinel University
10065 E. Harvard Ave., Suite 450
Denver, CO 80231

Dear President Adams:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees (“the Board”) concerning American Sentinel University (“the Institution”). This action is effective as of the date the Board acted, February 27, 2020. In taking this action, the Board considered materials from the most recent comprehensive evaluation, including, but not limited to: the Assurance Filing the institution submitted, the report from the comprehensive evaluation team, the report of the Institutional Actions Council (IAC) Hearing Committee, and the institutional responses to these reports.

Summary of the Action: The Institution has been granted initial accreditation. The Institution’s accreditation is limited to the RN to BSN at the undergraduate level and the MSN, MS in Business Intelligence and Analytics, MS in Information Systems Management, MBA in Healthcare, and DNP at the graduate level. The Institution is required to submit an Interim Report no later than May 30, 2020, regarding Core Component 2.A and the Federal Compliance Requirements, as outlined below. The Institution is required to submit an embedded interim report on Core Component 4.B, as also outlined below.¹

Board Rationale

The Board based its action on the following findings made with regard to the institution as well as the entire record before the Board:

The Institution meets, but with concerns, Criterion Two, 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,” for the following reasons:

¹ The Core Components cited herein reflect those as stated in the Criteria for Accreditation effective on February 27, 2020. Please note that as of September 1, 2020, HLC’s Revised Criteria for Accreditation will be effective. As such, since the Institution’s next review will take place after this date, the Institution must ensure that it appropriately addresses the underlying concerns cited in this Action Letter in the context of the Revised Criteria for Accreditation. HLC has published a Criteria for Accreditation Crosswalk, which is available on the HLC website, to assist institutions.

- The Institution distinguishes between student complaints, concerns and grievances in two policies, and these policies are explained, including in the Student Handbook.
- The Institution did not demonstrate that complaints made to the president are tracked and documented as required by the Institution's complaint policy, that complaints and arbitration are addressed in a timely manner, or that the complaint and arbitration processes are analyzed to improve processes at the Institution. The Institution acknowledged that it had not always documented complaints in enough detail.
- The Institution is currently revising its policy to include the process for documenting and responding to complaints.

The Institution meets, but with concerns, Criterion Four, Core Component 4.B, “the institution demonstrates a commitment to educational achievement and improvement through ongoing assessment of student learning,” for the following reasons:

- It is unclear how Institutional Learning Outcomes (ILO) data are analyzed across the Institution, the extent to which institutional benchmarks are being met or unmet, and the extent to which there is transparency and accountability in reporting the overall outcomes of student learning in the three ILO areas.
- The 2018 General Education Program Review included various approaches that were used to examine the quality of the program: curriculum maps, regular review of textbooks, library resources, faculty credentials, and innovation. However, no actual data on student performance were included in the program review.
- The current assessment plan notes that the ETS Proficiency Profile is being used at the Institution for ILO assessment, but the Institution did not provide data to confirm past year results of that assessment or how those results are being used by the Institution. Although the Institution may decide not to use this instrument in the future and opt instead for locally designed instruments, the Institution is still obligated to show the extent to which all graduates meet the ILOs and the trajectory of student achievement over time regarding this set of outcomes.
- Although the Institution has course maps that provide alignment to Program Learning Outcomes (PLOs), it did not demonstrate that it aggregates those findings into a transparent and cohesive look at its PLOs and student achievement of PLOs over time.

The Institution requires HLC follow-up with respect to the Federal Compliance requirement, Institutional Records of Student Complaints, for the reasons articulated above related to Core Component 2.A.

The Institution otherwise meets the Eligibility Requirements, the Assumed Practices, and the Criteria for Accreditation, including all Core Components.

The Institution is otherwise in compliance with all Federal Compliance Requirements.

Next Steps in the HLC Review Process

Interim Report: The Institution is required to submit an Interim Report no later than May 30, 2020, regarding Core Component 2.A and the Federal Compliance Requirements.

Embedded Interim Report: The Institution is required to submit an embedded interim report on Core Component 4.B with its next Assurance Filing.

Comprehensive Evaluation: The Institution is assigned to the Standard Pathway for its initial ten-year cycle. An institution in its first cycle of accreditation undergoes a comprehensive evaluation and is considered for reaffirmation of accreditation in Year 4 of the ten-year cycle. If reaffirmation of accreditation is granted in Year 4, the institution moves to Year 5 and continues on the Standard Pathway until it completes the ten-year cycle.² The Institution will host its next comprehensive evaluation for reaffirmation of accreditation (Year 4) in 2023-24.

HLC Disclosure Obligations

The Board action resulted in changes that will be reflected in the Institution's Statement of Accreditation Status as well as the Institutional Status and Requirements Report. The Statement of Accreditation Status, including the dates of the last and next comprehensive evaluation visits, will be posted to the HLC website.

HLC policy³ requires that a summary of Board actions be sent to appropriate state and federal agencies and accrediting associations. It also will be published on HLC's website. The summary will include this HLC action regarding the Institution.

On behalf of the Board of Trustees, thank you in advance for your cooperation. If you have questions about any of the information in this letter, please contact your HLC Staff Liaison, Dr. Gigi Fansler.

Sincerely,



Barbara Gellman-Danley
President

² INST.C.10.010, Substantive Requirements for Reaffirmation of Accreditation

³ COMM.A.10.010, Commission Public Notices and Statements

Cc: Chair of the Board of Trustees, American Sentinel University
William Tammone, Senior Vice President of Strategy and Innovation, American Sentinel
University
Evaluation Team Chair
IAC Hearing Committee Chair
A. Gigi Fansler, Vice President of Accreditation Relations, Higher Learning Commission
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