

June 30, 2026

BY CERTIFIED MAIL

Dr. Fred Fransen
President
Amerion College
900 Fifth Avenue
Huntington, WV 25701

Dear President Fransen:

This letter is formal notification of action taken by the Higher Learning Commission (HLC) Board of Trustees (“the Board”) concerning Amerion College (“the Institution”). This action is effective as of the date the Board acted, June 25, 2026. 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 placed on Probation because it is out of compliance with the Criteria for Accreditation. The Institution meets Core Components 2.C and 3.F with concerns. The Institution does not meet Core Components 2.A, 3.E, 4.B, and 4.C. The Institution is required to host a comprehensive evaluation for Probation no later than December 2027 to determine whether the Institution has ameliorated the findings that led to the imposition of the sanction.

Institutional Disclosure Obligation: HLC policy¹ requires that an institution inform its constituencies, including Board members, administrators, faculty, staff, students, prospective students, and any other constituencies about the sanction and how to contact HLC for further information. The policy also requires that an institution on sanction disclose this status whenever it refers to its HLC accreditation. HLC will monitor these disclosures to ensure they are accurate and in keeping with HLC policy. The Institution must submit drafts of its planned disclosures to these various audiences to its HLC Staff Liaison in advance of transmission and provide its Staff Liaison with a link to relevant information on its website. At a minimum, an institution must: i) provide a copy of this Action Letter to its governing board, administration, and faculty, ii) provide a copy of the enclosed Public Disclosure Notice to its currently enrolled students, and iii) prominently display the Mark of Accreditation Status where accreditation status is described on its website. Once disclosures have been made, the Institution must submit copies of its disclosure documents as a single .pdf file to <https://www.hlcommission.org/sign-in/submit-documents-to->

¹ INST.E.20.010, Probation.

[hlc/](#) (by selecting “Information about Institutional Disclosures”) no later than seven (7) business days following receipt of this Action Letter. HLC will retain this information as part of the Institution’s record.

Provisional Plan: HLC policy also requires that the Institution file a provisional plan with HLC for review and approval by the Institutional Actions Council according to HLC’s substantive change procedures. This provisional plan must comport with HLC’s requirements for provisional plans.² The Institution must submit its provisional plan within 90 calendar days of this letter.

Substantive Change: HLC policy³ requires that an institution placed on Probation be subject to additional requirements for substantive change during the Probation period and for three (3) years following the removal of Probation.

Notification Program: HLC policy⁴ states that an institution placed on Probation is ineligible for the Notification Program for Additional Locations for three (3) years following the removal of Probation, even if other requirements for the Notification Program are met.

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:

Amerion College (“the Institution”) does not meet Criterion Two, Core Component 2.A, “actions taken by the institution’s governing board, administration, faculty and staff demonstrate adherence to established policies and procedures,” for the following reasons:

- Many of the Institution’s processes and procedures are informal and undocumented.
- While the Institution provided draft policies that will be reviewed by the governing board, these policies have not yet been approved and there is otherwise limited evidence available of formal and approved policies and procedures to guide the work governing board.

The Institution meets, but with concerns, Criterion Two, Core Component 2.C, “in discharging its fiduciary duties, the institution’s governing board is free from undue external influence and empowered to act in the best interests of the institution, including the students it serves,” for the following reason:

- While the governing board delegates day-to-day decision-making to the president and leadership team, many of the governing board’s policies and procedures remain informal and undocumented and the Institution provided draft policies that have yet to be reviewed and approved by the governing board.

² FDCR.B.10.010, HLC Approval of Institutional Teach-Out Arrangements.

³ INST.E.20.010, Probation; INST.G.10.010, Substantive Change.

⁴ INST.E.20.010, Probation.

The Institution does not meet Criterion Three, Core Component 3.E, “the institution improves the quality of educational programs based on its assessment of student learning,” for the following reasons:

- The Institution has not implemented a formal student learning outcomes assessment process that includes regular review cycles, the identification and inclusion of stakeholders, rubrics for evaluating courses, and implementation of feedback systems to collect assessment data and address any gaps found.
- While the Institution provided some evidence of evaluations being used for assessment, these efforts are ancillary and are not representative of a systematic assessment process.
- While the Institution is undertaking efforts to establish a formal assessment process, these efforts have not yet resulted in the establishment of a process that involves faculty in collecting data to demonstrate learning quality, document improvements, or to validate skill acquisition in a manner that is replicable across programs.
- There is currently little distinction in the Institution’s process between curriculum design, review, and assessment, including as it relates to student learning outcomes.

The Institution meets, but with concerns, Criterion Three, Core Component 3.F, “the institution improves its curriculum based on periodic program review,” for the following reasons:

- While the Institution has engaged in specific reviews, it has yet to develop a systematic program review process with elements of a feedback loop, a data collection process, and program schedules to inform long-term curriculum or program improvements.
- While the Institution has an advisory board, which includes faculty, that is reviewing current program review activities, with plans for a deep review of the Institution’s courses and programs to align curricular improvements with current industry needs and standards, this work is nascent and ongoing.

The Institution does not meet Criterion Four, Core Component 4.B, “the institution’s financial and personnel resources effectively support its current operations. The institution’s financial management balances short-term needs with long-term commitments and ensures its ongoing sustainability,” for the following reasons:

- While the Institution’s current revenues appear to be sufficient to cover current expenditures, it is not currently meeting its projected revenue targets.
- The Institution’s enrollment projections appear overly ambitious given its declining enrollments in recent years and its current enrollments.
- While the Institution projects enrollment growth, the Institution does not have an enrollment plan with performance indicators to help it track progress on its enrollment goals, nor does the Institution have a plan to handle the projected enrollment growth if it were to occur.
- The Institution is not balancing short-term needs with long-term commitments as necessary to ensure its ongoing sustainability, evidenced by the lack of current financial statements.

- There is insufficient evidence to show that the Institution’s financial and personnel resources adequately support its current operations.
- While the Institution recently received grant funding and new grant applications are in progress, these grants do not resolve the Institution’s underlying structural concerns nor secure the Institution’s long-term future and the Institution otherwise lacks a plan to demonstrate how its revenues and expenses from FY25 to FY31 would change to support its ambitious enrollment targets and secure the institution’s ongoing sustainability.

The Institution does not meet Criterion Four, Core Component 4.C, “the institution engages in systematic strategic planning for quality improvement. It relies on data, integrating its insights from enrollment forecasts, financial capacity, student learning assessment, institutional operations and the external environment,” for the following reasons:

- While the Institution provided information about several draft initiatives developed as part of an updated strategic plan, this plan and its related activities have not been formally adopted by the Institution.
- While the Institution’s planning process included external stakeholders, this process was not systematic and did not include a mechanism for including any data or information from the Institution’s internal community.
- There is insufficient evidence to show that the Institution had tracked achievement of its stated goals in its last strategic plan or that it had used data, insights from enrollment forecasts, or information from internal operations to inform the development of a new strategic plan.
- The Institution does not have a plan to use results from its student learning assessment process, when developed and operational, in its budgeting and strategic planning processes.
- The Institution provided insufficient evidence to demonstrate that it has the necessary resources to fund identified strategic initiatives or how it would secure such resources beyond several immediate, one-time grant requests.

The Board of Trustees of the Higher Learning Commission has determined based on the preceding findings and evidence in the record that the Institution has demonstrated that it is not in compliance with the Criteria for Accreditation and should therefore be placed on Probation.

Next Steps in the HLC Review Process

Assurance Filing: The Board required that the Institution submit an Assurance Filing at least eight weeks prior to the comprehensive evaluation for Probation providing evidence that the Institution has ameliorated the findings of noncompliance identified in this action that resulted in the imposition of Probation and the findings of Met with Concerns, and providing evidence that the Institution meets the Criteria for Accreditation and Federal Compliance Requirements.

Comprehensive Evaluation: The Institution will host a comprehensive evaluation for Probation no later than December 2027 to enable a team of peer reviewers to determine whether

the Institution has ameliorated the findings of noncompliance that led to the imposition of Probation and whether the Institution otherwise meets the Criteria for Accreditation, and to make a recommendation about whether the Board should remove Probation or take other action.

Board Review: The Board will review the documents associated with the comprehensive evaluation for Probation at its June 2028 meeting to determine whether Probation shall be removed, or if the Institution has not provided sufficient evidence of amelioration as noted above, whether other action should be taken, up to and including withdrawal of accreditation.

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.

In accordance with HLC policy,⁵ information about this action is provided to members of the public and to other constituents in several ways. This Action Letter and the enclosed Public Disclosure Notice will be posted to HLC's website not more than one business day after this letter is sent to the Institution. Additionally, a summary of Board actions will be sent to appropriate state and federal agencies and accrediting associations. This summary 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. Jamie Stanesa.

Sincerely,



Barbara Gellman-Danley
President

Enc: Public Disclosure Notice

Cc: Chair of the Board of Trustees, Amerion College
Kris Bertelsen, Vice President & Director of Prison Education, Amerion College
Evaluation Team Chair
IAC Hearing Committee Chair
Jamie Stanesa, Vice President of Accreditation Relations, Higher Learning Commission

⁵ COMMA.10.010, Notice of Accreditation Actions, HLC Public Notices and Public Statements

Marla Morgen, Senior Vice President and General Counsel, Higher Learning
Commission

Sarah Armstrong Tucker, Chancellor, West Virginia Higher Education Policy
Commission

Elizabeth Daggett, Director, Accreditation Group, Office of Postsecondary Education,
U.S. Department of Education