

TIFFIN

UNIVERSITY

Paul Marion, Ph.D.
President

June 14, 2013

Ms. Karen L. Solinski
Vice President for Legal and Governmental Affairs
Higher Learning Commission
230 South LaSalle Street, Suite 7-500
Chicago, IL 60604-1411

Dear Ms. Solinski:

Tiffin University officially withdraws our Change of Control, Structure or Organization application and requests that the HLC Board of Trustees take no action regarding Tiffin University at the Board's meeting later this month. This will provide time for us to work with you and your colleagues at HLC to develop a proposal for HLC's consideration that will meet our obligations to the students, satisfy all HLC expectations and policies, and be appropriate for the future of Tiffin University. We believe that this request is reasonable in light of the withdrawal of our application, the severity of the potential consequences mentioned in your letter dated May 31, 2013, the fact that we had less than two weeks to prepare a response, and the following additional factors:

1. Tiffin University and Altius Education, Inc. will terminate the joint venture (Altius University, LLC) pursuant to the terms of the contracts and the name "Altius University" will no longer be used.
2. Tiffin University will not pursue independent accreditation for Ivy Bridge College and we officially withdraw our Substantive Change application for approval to create a branch campus in California.
3. Tiffin University has always been and continues to be in control of all aspects of the academic programs, academic tutoring and library services, and the financial aid, registrar, and bursar functions. The students have always been and continue to be Tiffin University students, who are enrolled in Tiffin University degree programs taught by Tiffin University faculty members and who earn Tiffin University degrees. The faculty members who teach TU courses through Ivy Bridge College attend monthly meetings of the Tiffin University Faculty, serve on Faculty

committees, and go through the same procedures as all other faculty members for consideration for promotion in rank, sabbatical leave, etc. As with our other four schools (School of Arts and Sciences, School of Business, School of Criminal Justice and Social Sciences, and School of Graduate and Degree Completion Programs), proposals for new academic programs must be approved by the Faculty Curriculum Committee and the full Faculty. Also, the academic Dean of Ivy Bridge College attends meetings along with the other TU deans each week with the TU Vice President for Academic Affairs.

The Ivy Bridge College structure is an organizational unit that has allowed Tiffin University to use the financial support and expertise of Altius Education to develop high-quality online courses and to market these to a wider audience than would have been available if Tiffin had tried to do this with our own resources. The arrangement is similar to the contracts that many accredited institutions have developed with third-party service providers. While the team's report appears to view Ivy Bridge College as somehow separate from Tiffin University, it is not. We are fully in control of all aspects of the academic programs, as well as the financial aid, bursar, and registrar functions. Marketing, student recruitment and other support functions that do not have to be handled by the accredited institution are handled by staff members who are employees of the services company, which is jointly owned by Tiffin University and Altius Education, so Tiffin has more control over these functions than most institutions that use outsourced services.

4. Tiffin University is considering whether to continue offering associate's degree programs in the future.
5. The concentrations within the Master of Education program and within the Bachelor of Professional Studies program that were to be delivered through Ivy Bridge College are now being delivered through TU's School of Graduate and Degree Completion Programs. We believe that our original plan to deliver these concentrations through Ivy Bridge was appropriate, but we decided to move them to our School of Graduate and Degree Completion Programs in order to avoid any further issues.
6. The position of Campus Executive Officer for Ivy Bridge College has been eliminated and all Tiffin University employees whose offices are in Toledo now report to an administrator on the main campus. For example, the Academic Dean for Ivy Bridge College now reports directly to the Tiffin University Vice President for Academic Affairs and the Director of Registration and Student Financial Services now reports directly to the Tiffin University Director of Financial Aid for financial aid issues and to the Dean of Academic Support Programs for the registrar functions. We believe that having the position of Campus Executive Officer as a Tiffin University employee reporting to me was appropriate in order to prepare for independent accreditation for AU/Ivy Bridge, but this administrative structure is no longer needed since we have decided not to pursue independent accreditation.

7. When the relationship with Altius Education was created, I wrote to the President of HLC on January 18, 2008 informing HLC of this fact and noting that the new arrangement was developed "in careful consideration of the *HLC Policies Regarding Institutional Dynamics* and the Commission's *Good Practices in Contractual Arrangements Involving Courses and Programs*". On June 15, 2009, I followed up with another letter to HLC that provided additional details about Ivy Bridge College of Tiffin University. Because I received no reply to either of these letters, we assumed that HLC had no concerns with our arrangement.

In 2010, HLC approved continuing accreditation through 2020 for Tiffin University without any concerns or conditions related to our arrangements with Altius Education or any issues with respect to the process that we followed, or any alleged default in process in our relationship with HLC. Our self-study report provided detailed information about Ivy Bridge College and the evaluation team reviewed the Altius legal agreements and visited our Toledo facility and met with staff and faculty members involved in the delivery of our online associate's degree programs through Ivy Bridge College of Tiffin University. The evaluation team's final report included no concerns or negative comments about our Ivy Bridge operation and the following positive comments:

- a. "It is evident that the University is embracing innovation and change with regard to on-line programs and Ivy Bridge entrepreneurship ventures." (page 15)
- b. "TU effectively utilizes strategic alliances/partnerships to develop and grow academic programs and to expand its local, national, and global presence. These alliances have been particularly effective in the success of the online Associates Degree programs." (page 15)
- c. "The concept of the Ivy Bridge partnership is an excellent strategic initiative. It addresses an underserved population through a strong curriculum, effective and efficient academic support, excellent instruction, and a very good online portal for program delivery." (page 28)
- d. "The CEO and center director are effective administrators who are thoroughly involved in advancing the mission of Ivy Bridge and the entire Tiffin University". (page 28)
- e. "Team discussions with faculty indicated that they are dedicated professionals delivering a quality academic program. The faculty are committed to the concept and spirit of assessment of student learning and making ongoing curricular and pedagogical improvements. " (page 28)
- f. Students are generally satisfied with the concept, location, quality of faculty, and academic support given to the Toledo center." (page 28)
- g. "Ivy Bridge delivers quality education to a relatively underserved population. Its staff support concept is innovative and well received by the students". (page 29)
- h. "Tiffin's Ivy Bridge partnership and its European alliances are clear examples of using external relationships to further the mission of the University and stabilize the financial condition." (page 31)

Since 2010, the only significant changes that have taken place with Ivy Bridge College are that the academic programs that were determined by the HLC team to be very good have continued to improve, the level of student satisfaction that was evaluated by the HLC team as very good has continued to increase, and additional requirements for admission have been implemented recently in order to increase the percentage of enrolled students who are likely to succeed.

8. Based on their satisfaction with the quality of our online associate's degree programs, more than 150 accredited colleges and universities across the nation have entered into articulation agreements with Tiffin that guarantee transfer admission for all students who earn an associate's degree delivered through Ivy Bridge College of Tiffin University.
9. Enrolling an underserved population in our high-quality online associate's degree programs fits exactly with the Tiffin University mission of providing access and opportunity to quality degree programs for traditional college-age students and adult students, many of whom are among the first generation in their families to attend college.
10. The statement in your letter that "the Board will likely also consider setting a deadline by which AU/Ivy Bridge would need to be disassociated from Tiffin, and requiring a teach-out plan for students at AU/Ivy Bridge who need to remain at an accredited institution to be taught out by another institution" is confusing and extremely troubling for the following reasons:
 - a. Tiffin University is an accredited institution and the students are Tiffin University students who are enrolled in Tiffin University courses that are taught by Tiffin University faculty and earn Tiffin University degrees, so it is only appropriate that Tiffin University handle the teach-out plan if such a plan is deemed necessary.
 - b. Not only would involving another institution be inappropriate, it would be detrimental to our students since Tiffin has articulation agreements with more than 150 accredited colleges and universities and many of our students decided to enroll based on their plans to transfer to one of those institutions.
 - c. The implication that Tiffin University's accreditation status could be negatively affected would do great harm to the positive reputation that we have developed and would create confusion among currently-enrolled students and prospective students for all of our master's, bachelor's, and associate's degree programs. There is no reason to subject Tiffin University and our students to this harm and confusion in light of the points made in this letter.

In summary, we ask that no formal action be taken by the HLC Board at its meeting later this month because of the factors described above. We request the opportunity to work with the appropriate HLC staff members to develop a proposal that is in the best interests of our students, meets all HLC requirements, and does not damage the future viability of Tiffin University.

Since we are withdrawing our application for Change of Control, Structure or Organization, we assume that a detailed response to the team's report is not necessary. However, the attached response is provided for the record. The process described in Step Five: Institutional Response of HLC's *Change of Control, Structure, or Organization: Commission Procedure* specifies that "the institution should address any concerns that staff raise in the report". Therefore, our response includes our reactions to some of the allegations and assumptions contained in the Staff Summary Report, as well as identification of factual errors.

Please let me know if additional information is needed.

Sincerely,

A handwritten signature in cursive script that reads "Paul Marion". The signature is written in black ink and is positioned above the printed name and title.

Paul Marion
President

cc: Dr. Robert Appleson, Vice President for Accreditation Relations, Higher Learning Commission