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# Evaluating Distance Education

Are You Ready?

ETOM Summer Retreat – June 2019

## Presenters

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## Overview

- Accreditation Overview
- Criteria for Accreditation
- Definitions and HLC Stipulations for Distance and Correspondence Ed
- Federal Requirements
  - Student Identity and Verification
  - State Authorization
- Substantive Change Requests
- Role of Peer Review to Evaluate Distance Delivery
- C-RAC Guidelines



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## What is Accreditation

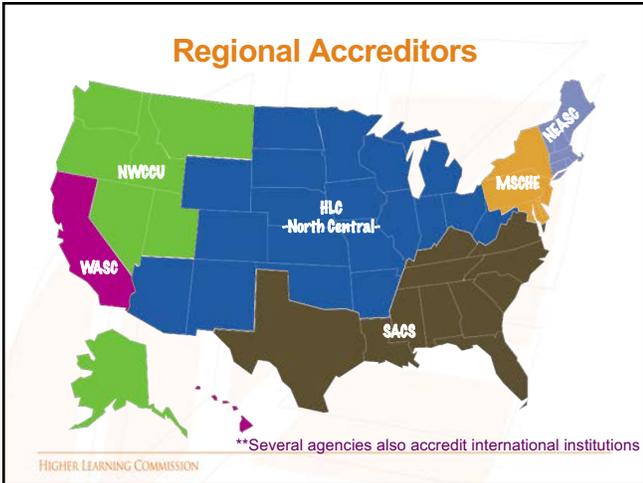
A voluntary process of self and peer evaluation that has two fundamental purposes:

- quality assurance
- institutional and program improvement

2 types of U.S. agencies

- institutional (whole entity) – national & regional
- specialized (individual program)

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### Regional Accreditors

- Review institutions based on a set of institutional guiding values.
- Recognized as gatekeepers for access to U.S. Department of Education Federal Student Aid programs.
- Evidence demonstrates ability to meet Criteria for Accreditation.

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### Assurance Arguments and Distance Education: HLC Criteria and Guidelines

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### QUIZ

?
?

TRUE/FALSE

Institutions must address distance education delivery in the Assurance Argument.

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## One Accreditation Multiple Pathways

### Criteria for Accreditation

- Central to demonstrating quality

### Assumed Practices

- Unlikely to vary by mission, matters of fact rather than judgment

### Eligibility Requirements

- Demonstrate eligibility for seeking accredited status

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## Elements of a Criterion

### Criteria

- Broad statements
- Must be explicitly addressed

### Core Components

- Specific areas of focus, define criterion
- Must be explicitly addressed

### Sub-components

- Not comprehensive
- Used to help explicate various elements of the core component
- Need not be individually addressed

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## Considering the Criteria for Accreditation



The Criteria provide the context for evaluating distance education.

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## Criterion 1

### Mission

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

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## **Criterion 2**

### **Integrity: Ethical and Responsible Conduct**

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

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## **Criterion 3**

### **Teaching and Learning: Quality, Resources, and Support**

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

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## **Criterion 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 learning through processes designed to promote continuous improvement.

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## **Criterion 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.

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## Review of the Criteria

Peer reviewers evaluate the institution's documents to affirm that the institution successfully demonstrates compliance with the Criteria by reviewing the Core Components.

Because peer review is concerned with quality improvement, the team takes note of any areas that must be improved to assure continued compliance.

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## Definitions for Distance and Correspondence Education



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## QUIZ



### TRUE/FALSE

The level of interaction between instructor and student is one major distinction between correspondence and distance education.

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## Definitions - Distance Education

Education that uses one or more of the technologies listed below to deliver instruction to students who are separated from the instructor and to support **regular and substantive interaction between the students and the instructor, either synchronously or asynchronously**. The technologies may include:

the internet; One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite or wireless communications devices Audio conferencing; or Video cassettes, DVDs and CD-ROMs, if the cassettes, DVDs or CD-ROMs are used in a course in conjunction with any of the technologies listed above.

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## Definitions - Correspondence Education

Education provided through one or more courses by an institution under which the institution provides instructional materials by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor.

Interaction between the instructor and the student is **limited, is not regular and substantive, and is primarily initiated by the student.**

Correspondence courses are typically self-paced. Correspondence education is not distance education.

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## Distance vs. Correspondence

- Separate HLC approval paths for distance and correspondence education.
- Review of distance education also occurs at comprehensive evaluations and if triggered for other reasons.

Key differences in definitions:

- Regular and substantive interaction...
- Time and pacing

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## Definitions of Distance Delivery

- Distance-delivered **courses** – Courses in which at least 75% of the instruction and interaction occurs via electronic communication, correspondence or equivalent mechanisms, with the faculty and students physically separated from each other.
- Distance-delivered **programs** – Certificate or degree programs in which 50% or more of the required courses may be taken as distance-delivered courses.



NOTE: No longer approve individual programs. HLC approves capacity to offer distance and/or correspondence education

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## Purpose of Distance Delivery Review

The purpose of examining distance learning is the **same as the purpose of evaluating face-to-face instruction, student services, etc..**

Reviewers evaluate the extent to which the organization meets the overall Criteria for Accreditation, in alignment with the mission of the organization.



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## HLC Criteria and DE Guidelines

DE Guidelines	HLC	Criterion 1	Criterion 2	Criterion 3	Criterion 4	Criterion 5
1. Mission & Purpose		1.A, B, C, D				5.A
2. Planning & Evaluation			2.A, 2.B	3.A	4.A	5.A, B, C, D
3. Governance			2.C, 2.E	3.A	4.A	5.A
4. Curricula			2.B	3.A, 3.B, 3.D	4.A, 4.B, 4.C	5.B
5. Effectiveness				3.D	4.B, 4.C,	5.C, 5.D
6. Faculty				3.B, 3.C, 3.D	4.A	5.A, 5.B
7. Students	1.B		2.B, 2.E,	3.B, 3.D		
8. Resources & Support				3.C, 3.D		5.A, 5.C, 5.D
9. Integrity			2.A, B, 2.D, E			

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## Group Activity

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## Federal Requirements



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## QUIZ



True or False



HLC does not review student identity verification protocols. This is a responsibility of the federal government.

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## Student Identity — HEOA

Accrediting agencies **must** require institutions that offer distance education or correspondence education to have processes to establish that the student who registers for a distance education or correspondence course or program is the same student who participates in and completes the program and receives the academic credit.



identity

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## Student Verification

- Institutions should have systems to monitor repetition of IP and email addresses.
- HLC will review an institution's student identity verification protocols when the institution requests permission to add programs in distance delivery AND prior to reaffirmation of accreditation.
- HLC will also require that institutions submit information about student identity verification protocols on HLC's Institutional Update.



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## Federal Compliance Worksheet (FY2019)

### 4. Practices for Verification of Student Identity

Does the institution have students enrolled in distance or correspondence courses, as defined in federal definitions?

- Yes  
 No (if no, please move on to Title IV Program Responsibilities)

How does the institution verify the identity of students enrolled in these courses?

How does the method of verification make reasonable efforts to protect student privacy?

Are there any additional costs (e.g., fees associated with test proctoring) charged directly to the student because of this method?

- Yes  
 No

If yes, how are the additional costs disclosed to students prior to enrollment in a distance or correspondence course?

Provide the web address where the public can access information regarding the additional costs.

Link:

For more information see Federal Requirement 34 CFR §602.17(g).  
Related HLC Requirement: Core Component 2.A.

## Federal Regulation

If the method by which the institution verifies student identity will incur a cost to the student (e.g., a fee for a proctored exam) the institution **must** disclose that cost to the student at the time of registration or enrollment.



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## QUIZ



True or False

No formal approval or documentation is required to enroll students from all states.

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## Update on Negotiated Rulemaking

- Consensus Met now U.S. Department of Education will draft language
- Period for comments opens Fall 2019
- Potential effective date 7/1/2020.....but
- Potential for HEA reauthorization by Congress

DE Issues – direct assessment, student identity verification, flexibility, DE disclosures, definition of academic engagement, calculate % of correspondence students, written arrangements

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## Revisions to Federal Compliance

- Evaluation of Current Worksheets
- Streamlined filing because some of the issues are covered in other policies such as the Criteria
- New worksheet goes into effect 9/1/2019

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## State Authorization

- Institutions must meet the regulations of **each** state regardless of USDE regulations.
- Regulations differ by state.
- Understand “operate” and “not physically located.”
- Enforcement began July 1, 2014.
- Is your institution on the NC-SARA list?  
(<http://nc-sara.org/sara-states-institutions>)



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### Definitions of Distance Delivery: Peer Reviewer Perspective

- Examine “blended” or “hybrid” courses to see if they conform to definition...
- Investigate if it is possible to “cobble” together a distance degree with existing distance courses...



Looking to affirm the institution follows definitions and is operating within approved threshold.

### Distance vs. Correspondence: Peer Reviewer Perspective

- Do distance education courses have regular and substantive interaction?
- Do distance education courses differ from correspondence courses via interactions?
- Do distance education courses differ from correspondence courses via time/pacing?

Distinctions are *important* - federal **financial aid** has different thresholds for distance and correspondence



### Accreditation Process



**PREPARATION**  
Institution participates in assurance activities



**EVALUATION**  
Peer reviewers evaluate and make recommendations  
*Due process includes institutional response*



**DECISION MAKING**  
Institutional Actions Council (IAC) or Board of Trustees take final action

### Group Activity

## Substantive Change Requests



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## QUIZ



TRUE/FALSE

Institutions must submit a Substantive Change Request if it plans to *initiate* or *expand* its distance or correspondence education offerings.

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## Course-Level Approval

Institutions must report activity at the course level for correspondence and distance education.

This includes but is not limited to data such as course enrollments, completions, student demographics, instructor qualifications, course outcomes, etc.

You should be able to answer reviewer questions about *what* courses you are offering, to *whom*, *why*, and *how*.

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## Initiation of Programs

Every institution must seek approval from HLC for the initiation of distance or correspondence education programs wherein **50 percent or more of the courses or credits** are offered through the modalities listed in the definitions.



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## HLC Stipulations

- a. Not approved for distance education.
- b. Approval for distance education is limited to courses.
- c. Approval for distance education is limited to courses and one program.
- d. Approved for distance education courses and programs.

Same language used for correspondence stipulations

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## Expansion

- Institutions will be required to seek approval for the expansion of distance or correspondence education.
- Institutions can move from course-level approval and expand to the full stipulation if they will offer two or more programs.



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## Review of Institutional Stipulations

- Institutions with Distance Education approval
- Institutions with Correspondence Education approval

WHAT ARE YOUR INSTITUTION'S STIPULATIONS??

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## Substantive Change Survey

1. Do you have any distance-delivered **courses** that match the following definition?

Distance-delivered courses are those in which all or the vast majority (typically 75% or more) of the instruction and interaction occurs via electronic communication, correspondence, or equivalent mechanisms, with the faculty and students physically separated from each other.

- Yes
- No

2. Are any of these courses correspondence education? (Please see definition above.)

- Yes
- No

3. Do you have any distance-delivered certificates or degree programs?

Distance-delivered programs are those certificate or degree programs in which 50% or more of the required courses may be taken as distance-delivered courses.

- Yes
- No

If you answered **yes** to Question 3, please complete a Distance Delivery Substantive Change Application.

### Substantive Change Application(s)

- Brief but detailed PDF submission for *each* request (10-30 pages)
- Only include requested attachments
- Answer all questions: Part 1 - very concise
- Part 2: questions focus on capacity, planning, quality, support, and evaluation
- Maybe assigned to a Change Panel or require a Change Visit
- If desiring an application to be reviewed as part of a comprehensive evaluation, at least Part 1 must be submitted six months prior to the visit

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### Group Activity

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### C-RAC Distance Education Guidelines

The Guidelines for the Evaluation of Distance Education (on-line Learning) have been developed by the Council of Regional Accrediting Commissions (C-RAC) to assist institutions in planning distance education and to provide an assessment framework for institutions already involved in distance education and for evaluation teams.

They are based on a 2006 report prepared by the General Accounting Office, Evidence of Quality in Distance Education drawn from Interviews with the Accreditation Community and the "Best Practice Strategies to Promote Academic Integrity in Online Education," prepared by WCET.

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### C-RAC Distance Education Guidelines

- Complete document available at: <https://www.hlcommission.org/Publications/publications-list.html> (See "Statements" section)
- HLC's guidelines align with the C-RAC guidelines...

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## Sample Evidence Suggestions



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## C-RAC Guidelines

1. Online learning is **appropriate** to the institution's mission and purposes.

### Sample Evidence

- Distance education is mentioned in the institutional mission and/or goals;
- Profile of students enrolled in online courses/programs is consistent with students the institution intends to serve;
- Ratio of online to on-campus students is appropriate to mission;
- Institutional goals are mentioned in distance course/program documents
- On-site: Interviewees can articulate how distance education fits within the mission

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## C-RAC Guidelines

2. The institution's plans for developing, sustaining and, if appropriate, expanding online learning offerings are **integrated into its regular planning and evaluation** processes.

### Sample Evidence

- Needs analysis reports;
- Documented plans for maintaining and/or expanding online course offerings (i.e. strategic plans);
- Institutional budget docs and technology plans/processes explicitly include distance education;
- Multiple institutional offices and administrators are involved in distance education planning and evaluation;
- Institutional assessment of capacity (campus plan, etc.)

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~~Plan A~~  
~~Plan B~~  
~~Plan C~~

## C-RAC Guidelines

3. Online learning is incorporated into the institution's **systems of governance and academic oversight.**

### Sample Evidence

- Online program and course evaluations;
- Documented approval process for distance education courses and programs (same as f2f);
- Committee meeting notes/interviews outlining faculty role in approval, design, and implementation of distance education curriculum;
- Policies/processes outline the assurance of academic rigor and quality

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## C-RAC Guidelines

4. **Curricula** for the institution's online learning offerings are coherent, cohesive, and comparable in academic rigor to programs offered in traditional instructional formats.

### Sample Evidence

- Program descriptions and course syllabi;
- Enrollment cap policies in place and verified;
- Benchmark online curricula/syllabi with f2f programs/courses;
- Demonstration of dependable class schedules;
- Interaction between students and faculty is facilitated within the LMS and evidence/examples show it occurs;
- Description of course/curriculum design processes



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## C-RAC Guidelines

5. The institution **evaluates the effectiveness** of its online learning offerings, including the extent to which the online learning goals are achieved, and uses the results of its evaluations to enhance the attainment of the goals.

### Sample Evidence

- Program reviews for online programs/courses;
- Program/college accreditation documents (ABET, AACSB)
- Yearly reports of academic and student support services;
- Graduation/retention rate plans and reports;
- Assessment office reports;
- Planning documents that integrate/use assessment data



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## C-RAC Guidelines

6. **Faculty** responsible for delivering the online learning curricula and evaluating the students' success in achieving the online learning goals are appropriately qualified and effectively supported.

### Sample Evidence

- Personnel data and vitas for all instructional faculty paired with programs in which they teach;
- Faculty training and evaluation manuals/guides/modules;
- Faculty and program handbooks and websites;
- List of technical and pedagogical training provide with dates and attendance/completion data;
- Faculty evaluation data including student evalual
- Job postings and turnover rates



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## C-RAC Guidelines

7. The institution provides effective **student and academic services** to support students enrolled in online learning offerings.

### Sample Evidence

- Technical support hours listed/accessible on web, syllabi;
- Readiness quiz and orientation for online students;
- Websites for online access to financial aid, registration, library resources, tutoring, career counseling, etc.;
- Student complaint process clearly defined on syllabi, in courses, in student handbook, and available electronically;
- Marketing materials and program websites



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## C-RAC Guidelines

8. The institution provides **sufficient resources** to support and, if appropriate, expand its online learning offerings.

### Sample Evidence

- Budget trends and projections for distance education;
- Multi-year budget lines showing ongoing funding for resources supporting online learning;
- Multi-year scalable technology plan that specifically addresses online learning;
- Needs assessment documents;
- Strategic plan for distance education w/ action items and budget projections

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## C-RAC Guidelines

9. The institution **assures the integrity** of its online learning offerings.

### Sample Evidence

- Institutional policies on academic integrity explicitly reference online learning;
- Academic integrity is part of online student orientation;
- Faculty training on academic integrity and pedagogical ways to reduce cheating;
- Academic integrity is addresses in syllabi, program policies, and student handbook;
- Student verification and authentication processes.

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## Group Activity

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## Final Thoughts...

HLC Criteria address effective teaching, learning, learning environments, planning and improvement, assessment, efficacy, resources, etc.—  
**regardless of delivery method.**

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## Final Thoughts...

- During institutional visit, reviewers will want to meet with individual(s)/unit(s) with distance education responsibilities (admin, faculty, students, staff).
- Clearly demonstrate institutional capacity, planning, quality, support, and evaluation relative to distance education.
- Ensure distance education is **integrated** into assurance argument.

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## Evaluation

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