



Higher Learning Commission
A Commission of the North Central Association

**Reviewing Delivery:
Distance and Correspondence
Education**

Spring 2012 Peer Corps Training

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Session Overview

- Status of Distance Delivery
- Overview of Delivery Policy
- Substantive Change
- Comprehensive Evaluation & Quality Checkup Visits

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Welcome!



Getting to Know You . . .

- Type of institution
- Experience with distance learning
- Experience with peer review

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Purpose

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

1. **What have been the benefits?**
Challenges?
2. What are the myths and misconceptions?
3. What are emerging issues?

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How many of you said...

- ✓ **Drives innovation and change in curricula, teaching, assessment, learning?**
- ✓ Allows for building from ground up--versus having to unlearn, tear-down old
- ✓ Naturally draws right people--faculty, administrators, etc.
- ✓ Moves faster--both good and bad
- ✓ Not sure who is taking the class
- ✓ Challenges in-place systems

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How many of you said...

- ✓ Forces improvement of web services--benefiting all students
- ✓ Requires rethinking oversight, governance, reward systems, professional development
- ✓ Grows faster, requires more work and resources, pushes deeper learning...
- ✓ Fits some students & faculty better than others

What have we missed...?

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Representative Resources

- Distance Education Report
 - <http://www.magnapubs.com/catalog/distance-education-report-newsletter/>
- Sloan-C
 - <http://commons.sloanconsortium.org/home>
- WCET – especially good for policies/regulations
 - <http://wcet.wiche.edu/>
- University of Illinois-Springfield – Online Learning Report – Raymond Schroeder
 - <http://people.uis.edu/rschr1/onlinelearning/>
- Eduventures
 - <http://www.eduventures.com/services/learning-collaboratives/online-higher-education>
- Faculty Focus – a Magna Publication
 - <http://www.facultyfocus.com/>
- Educause – more generic IT and higher ed
- C-RAC Statement
 - Revised July 2009 Statement (see ncahlc.org)

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C-RAC Guidelines

1. Online learning is appropriate to the institution's mission and purposes.
2. The institution's plans for developing, sustaining and, if appropriate, expanding online learning offerings are integrated into its regular planning and evaluation processes.
3. Online learning is incorporated into the institution's systems of governance and academic oversight.

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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.
5. The institution evaluates the effectiveness of its on-line 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.

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

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C-RAC Guidelines

8. The institution provides sufficient resources to support and, if appropriate, expand its online learning offerings
9. The institution assures the integrity of its online learning offerings.

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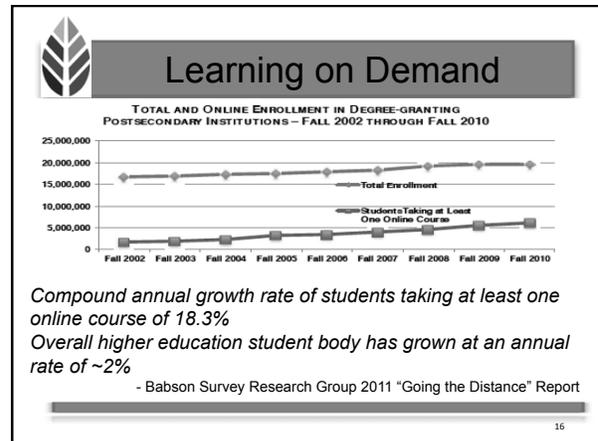
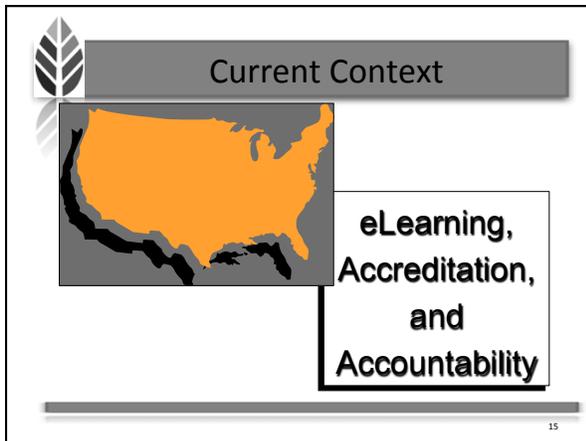


Multiple Best Practice Guidelines

Intended for institutions and not intended for use as evaluation matrices by peer reviewers.

May be useful for consultation for improvement.

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Quality & Accountability

State by State Regulation and Changing Dynamics

Higher Education Opportunity Act – 2008

New HLC Policies –
February 2009, 2010, 2011, 2012

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HEOA on Student Identity

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.*

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Student Verification

The Commission will review an institution's student identity verification protocols when an institution *requests permission to add programs* in distance delivery *AND prior to reaffirmation of accreditation.*

The Commission will also require that institutions submit information about student identity verification protocols on the Commission's Institutional Update.

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Growing Concerns

USDE "Dear Colleague" letter issued October 2011 calling for institutions to be more vigilant in looking for "fraud rings" that are using "straw students" to gain access to financial aid funds.

- More than 40 rings broken since 2005 with \$7.5M in fines.
- Average ring involves the names of 19 students.
- Institutions should have systems to monitor repetition of IP and email addresses

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State Authorization

- Defining 'Operate' and 'Not Physically Located'
- Regulations differ by state
- 'Good Faith' recognized, but enforcement begins July 1, 2014
- Many states not prepared or overwhelmed

WCET blog - wcet.wiche.edu/advance/state-approval

SHEEO state by state list of regulators - sheeo.org/stateauth/stateauth-home.htm

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Federal Credit Hour Definition

A credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally-established equivalency that reasonably approximates not less than:

- (1) *one hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or*
- (2) *at least an equivalent amount of work as required in paragraph (1) of this definition for other activities as established by an institution, including laboratory work, internships, practica, studio work, and other academic work leading toward to the award of credit hours.*



HLC Guidance on Credit Hour 2011

How should institutions prepare? Institutions should make sure that they have a policy at the institutional or department level that explains how credit hours are allocated to courses and programs. The policy should be in writing and take into account the federal definition of the credit hour as well as commonly accepted practice in higher education.

Such policies are typically expected to distinguish the various levels of learning that the institution offers, such as graduate and undergraduate, and may distinguish among departments or disciplines.

The policies should take into account such matters as practica, clinical rotations, compressed terms, and distance delivery.



Credit Hour Considerations

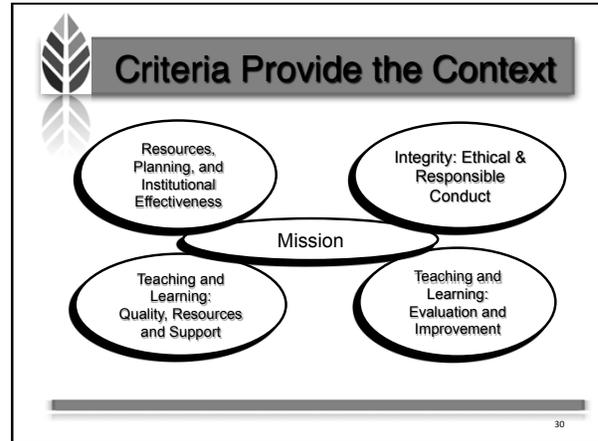
- Two Levels of Response
 - Institutional Actions
 - Course/Program Actions
- Institutional Actions
 - Policy and Procedures Development
 - Internal Monitoring



Contractual/Consortial

- Institutions may be partnering with various entities
- Partners could be:
 - Local institutions
 - International institutions
 - Corporate providers
- Consider control of curriculum, faculty oversight, evaluation of learning when addressing issues regarding these partners

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Thinking about the Criteria. . .

1. **Under what Criteria would you write about distance delivery?**
2. What evidence would you seek?
3. What interview questions would you consider asking? Who would you want to meet with at an institution?

Different tables will report out on different questions.

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Potential Areas to Review

- Policies
- Organizational Structures & Governance
- Planning
 - Strategic
 - Operational
 - Technological
- Resources
 - Technology
 - Physical
 - Support Systems
 - Financial
- Measuring Student Learning
 - Student Support
 - Teaching Effectiveness
 - Student Learning
 - Program Review
 - General Education
- Meeting Needs
 - Stakeholder Interests – Industry, Alumni, Other Institutions
 - Engagement across spectrum
 - Community service
 - Student co-curricular interactions

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Key HLC Message

The Criteria address effective teaching, learning, learning environments, planning & improvement, assessment, efficacy, resources, etc. -- regardless of delivery method.

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Your Work as a Peer Reviewer

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Distance Delivery

✧ Significant Revision

- Adopted Federal definitions
- Distance **DELIVERY** =
 - ✓ Correspondence Education
 - ✓ Distance Education

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Federal (and HLC) Definitions

Correspondence education means:

- (1) 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.
- (2) Interaction between the instructor and the student is *not regular and substantive*, and is *primarily initiated by the student*.
- (3) Correspondence courses are typically *self-paced*.
- (4) Correspondence education is not distance education.

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Federal (and HLC) Definitions

Distance education means education that uses one or more of the {following} technologies (i) to deliver instruction to *students who are separated from the instructor* and (ii) to support *regular and substantive interaction* between the students and the instructor, synchronously or asynchronously.

The technologies used may include:

- (i) the internet;
- (ii) one way and two way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
- (iii) audioconferencing; or
- (iv) videocassettes, DVDs, and CD-Roms, if the videocassettes, DVDs or CD-Roms are used in conjunction with any of the technologies listed in clauses (i) through (iii).

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Former Practice

- HLC currently tracked and approved distance education only when a program was offered 100% asynchronously online.
- Beginning **June 2010**, the Commission began to require prior approval at a lower threshold and adopted the federal definitions of distance and correspondence education as part of the substantive change process.

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Distance Delivery

- 50% of more of courses in degree program or certificate can be taken by distance
- Distance course = 75% of more offered by distance methods
- No longer approve individual programs (except 1st one) or certificates (5th one if other distance not yet approved)

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Distance Delivery

- Approval is for INITIATION or defined thresholds of EXPANSION of distance or correspondence education
- Initiation = 1st program/5th certificate
- Expansion = move from one *percentage bracket or threshold to the next*

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Defined Levels

Based on Total Number of Degree Programs

- ✓ No Initiation of Distance Activity
- ✓ Up to 5%
- ✓ Up to 20%
- ✓ Up to 100%

No approval of INDIVIDUAL programs.

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Working within a Level

- Approval required when moving to next bracket (*institutions use application on web*)
- Freedom within bracket to expand within stipulations without additional distance approval
- Lengthy effort to update institutional distance offerings
- Ultimately...fewer requests for approval

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Distance Delivery Reviewed

- Separate approval paths for distance and correspondence education
- Review of distance education also occurs at comprehensive review and if triggered for other reasons
- Institutions sent levels in late March 2012
- Conducting catch-up reviews through next year

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Approval to *Initiate*

- Every institution must seek approval from the Commission 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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Approval to *Initiate*

- Distance and Correspondence Education need *SEPARATE* approvals
- Plans to initiate a fifth certificate (and has not been reviewed and approved for a distance education/correspondence degree program)
- Offerings prior to change in policy were “grandfathered” but should have been reported to HLC.

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Approval to *Expand*

- Institutions will be required to seek approval for the **expansion** of distance or correspondence education into a new level.
- The threshold will be set by the Commission at the time of the initial approval of distance education.
- The threshold may vary among institutions depending on the size of the institution, its resources and its capacity to initiate distance and correspondence education programs.

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Nuts and Bolts of Review

Peer Review Approaches

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Substantive Change

Application

- Broader set of issues to address
- Supporting documentation needed

Staff Triage

- Confirm all components completed
- Staff assign next step of process –
 - Desk Review, Change Panel or Change Visit

Peer Review

- Consider the essential elements of distance delivery
- Individual consideration and Consensus discussion
- Recommend initiation or expansion within levels

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Panel Review Process

- Institution submits application (expanded questions)
- Panel members individually review
- Phone Conference(s) for Consensus
- Complete Change Panel Recommendation Form
- IAC acts on Recommendation

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Considering the Panel Process

Application

- What observations do you have regarding the application?
- What could be modified, eliminated, or added?

Peer Review

- What would improve the review?
- What type of recommendation should the reviewers be considering?

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Change Visit

- Primarily for initiation
- Utilizes previously submitted application and additional resource documents
- Opportunity to interact across institution
- Team completes change visit report (not focused visit mandated)
- IAC acts on Recommendation

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Key Areas for Review

- ✓ Statement, Mission, Context
- ✓ History with Distance Education
- ✓ Planning & Implementation
- ✓ Curriculum & Instruction
- ✓ Student Support
- ✓ Faculty Support
- ✓ Evaluation & Assessment
- ✓ Strengths & Areas for Improvement

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Review in Comprehensive Visit

- Provide summary of review conducted and summary of scope in Part I
- **Affirm institution is operating within approved threshold**
- Include 5-7 separate evidentiary statements within Criteria

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Review in AQIP

- **Quality Checkup (revised F'12)**
 - Provide conclusions in designated section.
 - Affirm that the institution is operating within the approved threshold.
- **Systems Appraisal**
 - Info. in Portfolio
 - Comment in Appraisal – Informs QC

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Embedded Change Requests

- Part 2 of Application included.
- Requires team to review & make recommendation on request.
- Team completes separate evaluation template.
- May be considered though most are processed through existing panel review processes.

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QUESTIONS??

Commission Resources - ncahlc.org

- C-RAC Distance Ed Guidelines
- HEOA Related Policies
- Applications
- Panel Instructions
- Report Templates

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