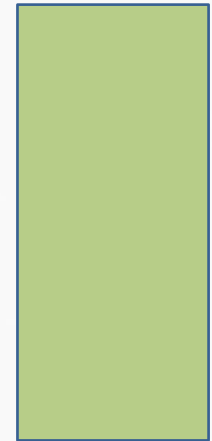


1926 2016



DISTANCE EDUCATION ACCREDITING COMMISSION

CAPPS 2016 ANNUAL MEETING



ACCREDITATION PRACTICE DISTANCE EDUCATION

- **Accreditation and a Dynamic Policy Environment**
 - Wide diversity of institution DE practices
 - Competency-Based Education
 - Educational Quality through Innovative Partnerships (EQUIP)
 - Direct Assessment
 - Prior Learning Assessment
 - Credentials/Badges
 - Intensified scrutiny of accreditor decisions on DE programs
 - Heightened expectations for DE institutions and programs
 - Involvement of Professional Licensure Community

DOCUMENTS TO CONSIDER

- U.S. Department of Education sanctions against [St. Mary-of-the-Woods College](#) and its lack of interaction in distance learning courses (still unresolved since April 2012),
- U.S. Department of Education [Dear Colleague Letter](#) on Competency-Based Education (December 2014),
- Audits of the oversight by the [Higher Learning Commission](#) (September 2015) and the [Western Association of Schools and Colleges](#) (August 2016) of Competency-Based Education (CBE), and
- A presentation by [Department personnel](#) (March 2016).

ACCREDITATION PRACTICE DISTANCE EDUCATION

The Federal Definition of Distance Education

TITLE 34 §600.2 DEFINITIONS.

- *Distance education* means education that uses one or more of the technologies listed in paragraphs (1) through (4) of this definition 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—
 - (1) The internet;
 - (2) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
 - (3) Audio conferencing; or
 - (4) 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 in paragraphs (1) through (3) of this definition.

§600.2 DEFINITIONS.

- Correspondence course: (1) A course provided 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 student is limited, **is not regular and substantive**, and is primarily **initiated by the student**. Correspondence courses are typically **self-paced**.
- (2) If a course is part correspondence and part residential training, the Secretary considers the course to be a correspondence course.
- **(3) A correspondence course is not distance education.**

THE HEART OF THE MATTER

“A correspondence course is not distance education”

These definitions came into effect on July 1, 2010. Prior to that, courses were classified as either “correspondence” or “telecommunications.”

IS YOUR DISTANCE EDUCATION COURSE REALLY A CORRESPONDENCE COURSE?



ST. MARY OF THE WOODS

- The interpretation seems to have evolved over time. In the St. Mary-of-the-Woods audit report, the auditors seemed to focus on the lack of use of technologies (a cornerstone of the distance education definition) in many of their courses.
- “The Audit found that ‘instructors did not deliver lectures or initiate discussions with students. Tutoring and other instruction resources were provided at the student’s discretion.’”
- For that audit review, there was much focus on the interaction being self-paced and initiated by the student. Over time, additional criteria were outlined.

DEAR COLLEAGUE LETTER

“We do not consider interaction that is wholly optional or initiated primarily by the student to be regular and substantive interaction between students and instructors. Interaction that occurs only upon the request of the student (either electronically or otherwise) would not be considered regular and substantive interaction.”

EVOLVING CRITERIA

- 1) Interaction is initiated by the instructor
- 2) Interaction must be “regular” and probably somewhat frequent.

Myk Garn, University System of Georgia and member of the Competency-Based Education Network board, addressed this issue in his recent [post](#) on why we should stop using “self-paced” in CBE descriptions.

- 3) Interaction must be “substantive – of an academic nature not just “good work”
- 4) Interaction must be with an instructor that meets accrediting agency standards.

AUDITS OF ACCREDITORS

- The emphasis on the primacy of faculty is heightened in the WASC audit. Whereas, most prior documents talked about “regular and substantive interaction”, the WACC audit repeatedly uses the phrase “**faculty-initiated**, regular, and substantive interaction”.
- The HLC audit cites a CBE application for a substantive change as falling short when coaches and subject matter experts are used as part of the instruction. The audit notes that “*coaches would connect with students once each week, on average, and serve as academic advisors, coaches, and mentors*” and that “*the application did not indicate whether students would regularly interact with subject matter experts if the students were not struggling.*”
- “*While mentors or counselors may have an important role in direct assessment competency-based programs in supporting or assisting students, they should not replace faculty or instructors with subject-matter expertise.*”

USDE DEAR COLLEAGUE LETTER

For all CBE programs, including direct assessment programs, “regular and substantive” educational activity includes (but is not limited to):

- Participating in regularly scheduled learning sessions (where there is an opportunity for direct interaction between the student and the faculty member);
- Submitting an academic assignment;
- Taking an exam, an interactive tutorial, or computer-assisted instruction;
- Attending a study group that is assigned by the institution;
- Participating in an online discussion about academic matters;
- Consultations with a faculty mentor to discuss academic course content; and
- Participation in faculty-guided independent study (as defined in 34 CFR 668.10(a)(3)(iii)).

DEAR COLLEAGUE LETTER

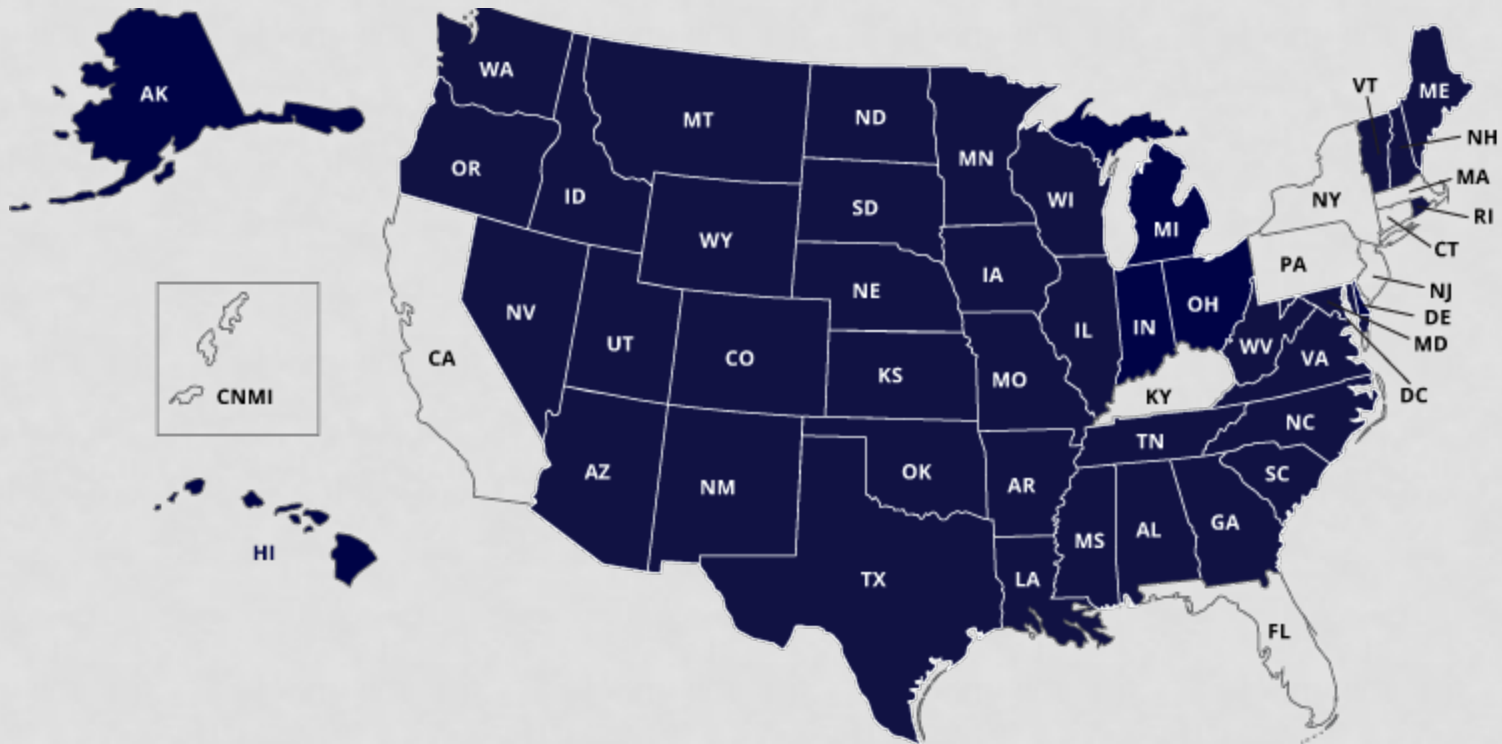
- A tendency to favor activities that further learning or assessment of learning over organizational or procedural communications.
- Does not identify which activities meet the “regular and substantive interaction” requirements but “merely grading a test or paper would not be substantive interaction.”
- Interactions between a student and personnel who do not meet accrediting agency standards for providing instruction in the subject area would not be considered substantive interaction with an instructor.”

IMPORTANT CONSIDERATIONS

Build experience and capacity:

- Assessment of regular and substantive Interaction
 - Policy, practice, documentation
- Experience with competency-based formats
 - Adaptive learning, direct assessment,
- Intensive review of teaching and learning delivered via content management systems
- Correspondence education
- Proctored examinations

NC-SARA



STATE AUTHORIZATION NPRM

July 25, 2016 NPRM on State Authorization Rules

would make proof of state authorization for distance education programs a condition of institutional eligibility to participate in the Title IV federal loan and grant programs

- Clarification of “consumer protection laws” enforcement/misrepresentation
 - Licensure/certification disclosures for students (context-borrower defense)
 - Process for consumer complaints
 - Definition of adverse action
- If the final rules are issued prior to November 1, they may take effect as early as July 1, 2017. If the final rules are issued after November 1, they will likely take effect July 1, 2018.

WE ARE IN THIS TOGETHER!



**KEEP
CALM**

AND

ENJOY

ACCREDITATION