

Update on Regional Accreditation Issues for E-learning

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In 2000, the Council of Regional Accrediting Commissions (CRAC) contracted with Western Cooperative for Educational Telecommunications (WCET) to create a set of Principles of Good Practice for Distance Learning to which all of them could ascribe.¹ It was a helpful document and is still being used, but 5 years have passed since

its publication. Much has changed in the intervening years. The use of the World Wide Web has exploded. There are many more traditional nonprofit institutions engaging in e-learning for students both on- and off-campus. In addition, the number of for-profit institutions has expanded enormously. Eduventures estimates the tuition revenues from fully online programs is well over \$5,000,000 this fiscal year, with over 2 million of that coming from for-profit institutions.²

In 1965, the original Higher Education Act (HEA) was passed by the U.S. Congress and, among other things, it authorized accredited colleges and universities to administer federal financial aid to their students. That authorization was to be renewed every 4 years. The last reauthorization was in 1998. Even though the 4-year timeline was extended, it is possible that a new version will be enacted in 2005. No one knows when something will actually occur or the exact content of that action, but there are some good guesses. In the last Congress, House Bill #4283 was introduced and several of its

features are likely to be carried over to this Congress. Many of the issues raised in the HEA relate to activities of institutions that will allow, or disallow, them from offering federal financial aid to students as well as how the Department of Education defines eligibility for several federal programs. There are some issues in that bill that would affect e-learning/distance learning and regional accreditation activities. These include:

- Repeal of the 50% telecommunications rule that would lift the limits on the number of students in—or courses offered through—e-learning;
- Repeal or modification of the 90:10 rule that requires institutions to have at least 10% of their tuition coming from nonfinancial aid sources;
- Improvement of transferability of credit from nationally accredited schools to those accredited regionally;
- Creation of a national definition of “higher education”;
- Making accreditation findings more available to the public; and



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- Institute disclosure of institutional performance data.

The primary issues around reauthorization relate to preventing fraud. The for-profit sector of higher education is very interested in opening-up access to federal financial aid to their students. Managers of distance learning programs at non-profit institutions are also interested in the same goal. However, the implications are not simple for regional accreditors.³ While Congress may want strong oversight of e-learning programs, accreditors are asking what kind of monitoring is appropriate. If a large university has over a hundred academic programs and three online programs, how much effort and expense should go into evaluating the three versus the other 100? Right now, the regional accrediting associations rely, in large part, on the presence of good internal program review processes that an institution can demonstrate to everyone's satisfaction. If all the programs (regardless of delivery medium) are required to go through these internal reviews, then the role for the accrediting community in examining distance or e-learning in unique ways seems a bit redundant.

In light of the pending reauthorization of HEA and the changes in activities since the C-RAC addressed distance or e-learning, I interviewed the heads⁴ of the regional associations to see what they are currently seeing and doing in the realm of e-learning. What follows is the result of these December 2004 conversations.

Institutions in the Northwest Commission on Colleges and Universities are increasing their use of e-learning and distance learning activities, but they are also becoming more sophisticated in serving students electronically. E-learning is becoming just one of a number of learning options available to students. Consequently, there is now

more of an emphasis on evaluating distance and e-learning activities in consort with other teaching strategies. Right now, the standards for e-learning programs are the same as those for face-to-face programs. However, the commission is in a 2-year process of revising their standards. The Executive Director, Sandra Elman, believes e-learning is likely to be incorporated into the new standards as just another teaching methodology, but it will be up to the institution to demonstrate learning effectiveness of all their teaching activities.

In the Western Accrediting Commission for Community and Junior Colleges, distance and e-learning activities are also growing rapidly. They have just completed a manual for colleges and evaluators to help everyone think about the issues associated with a distance learning environment. The commission's evaluation teams review e-learning programs and services electronically before they even visit a campus. The incredible growth of some online programs that are available throughout the state of California are creating some new issues. The Executive Director, Barbra Beno, reports students are now able to collect credits from several institutions and apply for a degree from the one from which they have at least 12 credits. She is concerned that the institutions granting the degree may not be able to assure the learning outcomes of the e-learning students who collect credits in this way.

At the Western Accrediting Commission for Senior Colleges, staff is seeing more increases in hybrid programs that require some campus-based activities rather than strictly e-learning. However, there are two major areas of concern with the e-learning activities. The first relates to faculty and the ongoing support they need from campuses to successfully teach online. The Execu-

tive Director, Ralph Wolff, does not believe that a brief training program on how to use a course management system is truly sufficient to prepare a faculty member to offer a high-quality course online. Instead, he believes that faculty need periodic opportunities to work together to discover the best ways to engage students as institutions move to fully integrate e-learning opportunities into the curriculum. The second concern relates to the support that students need. Again, just knowing how to use the technology and software does not mean a student understands how to take full advantage of an online learning opportunity. Wolff does think that e-learning tools can be used to create better learning environments than classrooms, but few institutions have yet learned how to support their faculty and students appropriately to realize this potential.

In the North Central region, the toughest issue for the Higher Learning Commission is keeping up with the institutions and what they are actually doing with e-learning. In the past, the institutions expanded their e-learning options so rapidly that they ended up with a degree program online before the accrediting agency could review it. To manage this, the Higher Learning Commission has created a standardized "Statement of Affiliation Status" for each member institution. That statement and an annually updated institutional profile will be available on the commission's Website in early 2005. This will enable the commission (and the general public) to track an institution's activities, and it will trigger reviews when appropriate. The Executive Director, Steven Crow, noted another interesting issue. The North Central region is quite large and the growth of for-profit institutions is being felt heavily in this region. Many of these for-profit institutions

want to offer online programs, and to do so they are trolling for accredited institutions with which to partner or to buy. This is a relatively new situation and is keeping the staff of the commission quite busy.

The Commission on Colleges in the Southern Association continues to find value in the guidelines created by WCET, but there are concerns about how many institutions fail to recognize the level of investments they need to do a good job with e-learning. The Executive Director, James Rogers, noted that the association does not want institutions to jump into e-learning without a thorough analysis of what the actual expenses will be and what services need to be available to help faculty and students. To save the institutions time and money, the commission has instituted a new procedure in states where there are statewide networks that offer some centralized support services for either students or faculty. They have conducted statewide reviews of the institutions offering online courses or programs. Much of the review work was conducted online, with evaluators interviewing students and exploring the services available. This looks like a promising model.

The Middle States Commission on Higher Education added a section on distance learning to their new standards that were published in 2002. This section groups distance learning into related educational activities along with nondegree programs, branch campuses, experiential learning, and the like. The section on distance learning conforms to the WCET Guidelines document mentioned above. This commission accredits about 500 institutions, and about one third of those have programs that allow students to complete 50% or more of their work via distance learning. According to the Executive Director, Jean Morse, an important issue for

Middle States is student learning, regardless of the medium, and whether the institution is using the data they collect to really improve teaching and learning.

The New England Association's Commission on Institutions of Higher Education is also seeing e-learning growth at a steady pace, but most of it is in blended, or hybrid, delivery systems, versus completely online programs (like the Western Commission for Senior Colleges). As a result, they are less concerned about pedagogy and infrastructure. However, the Executive Director, Charles Cook, notes there may be some unintended consequences emerging. The biggest is the question around the integrity of the degree issued by an institution whose students have taken courses from multiple providers. There has never been a reason for the commission to deal with residency issues, but these could emerge. The commission is finishing the revision of their standards and now have a new section called the integrity of the degree, which endeavors to assign responsibility to the institution to demonstrate the integrity of its degrees. This could mean a shift to student outcomes as a way though the residency issues, but no one is sure this is the ultimate solution. Another issue Cook sees arising is how an accrediting association can determine what level of technology is necessary on a campus for that campus to be offering students the type of education that is relevant for today's world. There is no set of guidelines for facing this issue.

In summary, e-learning programs have invaded mainstream higher education. They are being used to serve both students off-campus and those who take their courses on a campus. E-learning is no longer a sideline activity and, as such, is being addressed by the accrediting community and the fed-

eral government. My guess is that approximations will continue to evolve, but it will be several years before any of us truly understands how to monitor its quality consistently.

NOTES

1. To see this document go to <http://www.wcet.info/resources/accreditation/>

2. Reported by Sean R. Gallagher, Senior Analyst, Eduventures, Inc. at The Education Industry Finance & Investment Summit, Washington, DC, December 2004.

3. Panel discussion by Judith S. Eaton (president, Council for Higher Education Accreditation), Steven D. Crow (executive director, The Higher Learning Commission, North Central Association), Martin Michaelson (partner, Hogan & Hartson LLP), Mark Pelesh (executive vice president for Legislative and Regulatory Affairs, Corinthian Colleges, Inc.) at The Education Industry Finance & Investment Summit, Washington, DC, December 2004.

4. Interviewees included Barbara Beno (executive director, Accrediting Commission for Community and Junior Colleges (ACCJC), in the Western Association, Charles Cook (director of the Commission on Institutions of Higher Education, New England Association of Schools & Colleges), Steven Crow (executive director, The Higher Learning Commission), Sandra Elman (executive director, Northwest Commission on Colleges and Universities), Jean Morse (executive director, Middle States Commission on Higher Education), James Rogers (executive director, Commission on Colleges, Southern Association of Colleges and Schools), and Ralph Wolff (executive director, Accrediting Commission for Senior Colleges of the Western Association).