

A FEW THOUGHTS:

REGULATION OF AND QUALITY ASSURANCE FOR DISTANCE EDUCATION IN THE U.S.

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1. Why do we need the states to be involved in the authorization of higher education institutions?

- a. They are critical for judging the qualifications and legitimacy of new institutions that have not established a track record for the accreditors to judge.
- b. They have the power of enforcement for degree mills and egregious bad actors – they can put them out of business. Accreditors can't do it directly, and it seems better not to have the federal government take this on if that can be avoided.
- c. They have the power (and in many places accept the responsibility) to pick up the pieces (student records, arrange for transfer, etc.) when an institution goes out of business.
- d. They are a resource (realistically taking legal action only in extreme cases) for consumer protection. Regardless of state laws and practices, state higher education agencies are contacted by students for assistance and they influence both policy and practice in their states.
- e. They have legal powers and don't need permission to use them. It is the job of higher education leaders to give them something that works and that looks attractive to them.

2. What should the states avoid doing?

- a. Becoming deeply involved in the "regulation" of fully accredited, well-established institutions who offer moderately sized distance education services as an integral part of their core academic programs. We need something like a nearly "automatic" approval for such institutions. An institution with a small distance education program should not have to jump through a lot of hoops to operate it.
- b. Fully duplicating the normal functions of accreditors, whether for distance learning or more traditional methods of instruction. We don't have the resources to pay for unnecessary duplication, and anything unnecessary shouldn't be done anyway.
- c. Continuing, without modification, obsolete regulatory procedures that are ill-suited for internet based instruction that crosses political boundaries. For example, practices that are reasonable for place bound, state located institutions, with a fixed academic calendar (such as requiring institutions to submit lists of faculty and their qualifications) become unreasonable when up to fifty states are involved and faculty hiring and turnover is virtually continuous.
- d. Employing regulatory mechanisms as a means of restraining competition and regulatory fees as a means of financing obsolete regulatory procedures.

3. What variation in institutional delivery systems should be recognized, and as far as possible reflected in approaches to quality assurance and regulation?

- a. Some institutions offer distance education programs that are fully integrated within their academic departments and delivery structure. For such institutions, quality assurance based on accreditation, supplemented with evidence that the same standards of instructional quality and student support apply to distance education delivery could be considered sufficient for both accreditation and state authorization.

- b. Some institutions, which predominantly deliver face-to-face instruction, have separately organized distance education programs, with a distinctive curriculum, faculty, and academic governance policies. In such situations, where the distance education activity is a quasi-auxiliary enterprise, separate accreditation and quality assurance procedures would seem appropriate for each academic delivery system. The distance education program in such institutions should be judged by the same standards and procedures used where the preponderant or sole means of instructional delivery is electronic media.

4. What does the nation need that we don't have?

- a. A widely accepted and employed industry consensus on the criteria and components of quality for distance education programs. The field has generated several well-articulated models, but they are not universally recognized and distance education programs are not widely and explicitly judged or held accountable to those standards. It would be good to articulate those principles and to get accreditors and states to use them in establishing minimal standards of quality. It would also be good to have standards and information on programs that students could use to distinguish between an excellent distance education program, an average one, and a poor one; this would make the market work more effectively.
- b. An accreditation approach to distance learning that holds all institutions accountable to minimal standards for delivery and does so credibly, so states can recognize that credential. If this is beyond the capacity of existing accreditors, perhaps a supplemental accreditation system should be explored.
- c. An effective mechanism for states to "buy-into" the approval of others, either other states or accreditors, or a combination of both. The interstate compact is such a mechanism, but it needs to be lean and simple to implement. Without a) the help of higher education in defining standards and b) transparency in the practices of different states in authorizing institutional operations, a lean, simple interstate compact won't be possible. Interstate agreements could take one of many forms, for example: a) A central, multistate agency employing uniform procedures endorsed by participating states; b) Regional compacts, that establish criteria for approved programs and monitor compliance with these criteria by state participants; or c) Individual state decisions to recognize the credentialing of other states or accrediting agencies based on a review of their policies and practices.
- d. A means of consumer protection (the ability to recognize substandard practice and to complain and find resolution) that works for routine problems that do not rise to a level requiring governmental involvement. This could be institutions holding themselves accountable to generally accepted (and widely publicized) standards of practice and providing internal processes to deal with complaints. The presence and effective working of such practices could be reviewed as part of accreditation. While such procedures are appropriate for all educational settings, the relative isolation of the distance learner may require extra and explicit attention to this need.

Concluding thought: Quality in postsecondary education derives from three components: inputs, process, and outcomes. Student outcomes are paramount, but students depend on the quality of institutional inputs (services and processes) to enable them to acquire knowledge and skill. While institutions should ultimately be held accountable for outcomes and encouraged to pursue them in innovative, cost-effective ways, their contributions to those outcomes and the connection between student achievement and institutional services and process is the basis of institutional quality.