

# Proposed 21<sup>st</sup> Century Distance Education Guidelines



National Council for  
State Authorization  
Reciprocity Agreements



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## OVERVIEW:

With the continued growth in postsecondary distance education, the assurance of quality in such programs impacts an increasingly large proportion of students. The COVID-19 pandemic has also required education at all levels to move to remote delivery, and most predictions are that overall increases will continue post-pandemic, emphasizing the relevancy of quality assurance for such programs.

The federal government, state governments, and accreditors all play important roles in assuring quality in distance education in the United States. Title IV of the HEA sets forth interdependent responsibilities for this triad to ensure program integrity. The states provide consumer protection, the accrediting agencies provide quality assurance, and the federal government's role is to provide oversight of compliance to ensure administrative and fiscal integrity of Title IV programs at institutions of higher education.

Per the federal definition, distance education includes both online learning and remote learning. To help assure quality, regional accreditors and other organizations have relied on the *C-RAC Interregional Guidelines for the Evaluation of Distance Education* that were adopted by the Council of Regional Accrediting Commissions in 2002, and were last updated in 2011. As distance education continued to develop, accreditors referenced and incorporated the guidelines into their own standards and processes. Institutional participation in State Authorization Reciprocity Agreements (SARA) includes a provision that an institution must adhere to the *C-RAC Guidelines*, so SARA member states are also reliant on this resource to ensure institutional compliance with SARA policy.

Given the numerous advancements in technology, learning sciences, competency-based programs, and distance learning pedagogy, along with the increase in distance education programs, the need for high quality credentials, and the economic realities facing families and states, it is time for a new set of guidelines. The National Council for State Authorization Reciprocity Agreements (NC-SARA) assumed a leadership role in supporting the development of this proposed new set of guidelines for institutional accreditors reviewing distance education.

These proposed *21<sup>st</sup> Century Guidelines* were developed in two key phases in a commissioned project with the National Center for Higher Education Management Systems (NCHEMS). First, NCHEMS undertook an in-depth study to determine the extent to which there were similarities in consideration of quality between the *C-RAC Interregional Guidelines for the Evaluation of Distance Education* and each accrediting organization's standards, policies, and guidelines related to distance education. This was completed through a review of publicly available documents and interviews with accrediting organizations' staff. The second phase involved the iterative development of these *21<sup>st</sup> Century Guidelines* based on that study, which involved interviews with current practitioners, researchers, and quality assurance professionals, as well as reviews and feedback by critical constituents.

Several criteria shaped the development of the proposed *21<sup>st</sup> Century Guidelines*, including that they be: developed in partnership with accreditors and other organizations and experts in the field; applicable to a wide range of institutions; congruent with the standards used by many of the institutional accreditors; relevant to accreditors and NC-SARA in assuring distance education quality; and accessible and useful to institutions for planning and continuous improvement purposes.

These *21<sup>st</sup> Century Guidelines* are therefore sensitive to the enormous variation in institutions offering distance education (e.g., in size, public/private, degree levels, programs), in students enrolled, in program design and delivery, in faculty model, and in the extent of preparedness and resources students have to study at a distance. Thus, the *21<sup>st</sup> Century Guidelines* are designed to inform, but not limit, accreditors and states in their judgment of satisfactory levels of quality in the offering of programs through distance education.

#### **PARTICIPANTS:**

A complete list of participants in this initiative is available in Appendix A. Comments from several participants are included in Appendix B, and Appendix C shares information about NC-SARA and NCHEMS.

## Proposed 21st Century Distance Education Guidelines

The following elements for assuring quality in distance education programs are proposed.

### Institutional Capacity

1. The institution offering distance learning programs regularly evaluates and demonstrates its capacity along multiple dimensions, including financial resources, technology infrastructure, data security, content expertise, instructional design, support for students and assessment of, and access to information resources.
2. Financial support for distance learning is sufficient given the scope of programming, enrollment, student body, methods of delivery, and support.
3. The institution supports diversity, equity, and inclusion through its learning environments and student support as appropriate to its mission and student body.
4. Educational quality is supported through continuing investment in technology and professional development for faculty as well as other academic, technical, and student support staff. Professional development is ongoing and includes attention to: technology, instructional design, learning science, pedagogy, assessment, and methods of using data for improvement.
5. The institution ensures that learning resources used for instruction and tools used for access to services are sufficiently supported and ensure accessibility and privacy for students. The institution provides clear policies regarding intellectual property.
6. Relevant information that orients students to their courses—such as syllabus, prerequisites, course delivery structure, class schedule, modes of communication—is provided to students on the institution's learning management platform. Students have ready access to available technical support services.
7. Online program management (OPM) and other contractual and consortial arrangements are reviewed to ensure that the institution retains appropriate authority and responsibility for the academic program and student privacy.

### Institutional Transparency and Disclosures

8. During the admissions process, information readily available to prospective students includes:
  - a. a clear description of the program, including curriculum, learning outcomes, and appropriate measures of student success (e.g., graduation rates, licensure passage rates by state, employment in the field, progression to the higher degree) disaggregated by modality;

- b. all costs, including tuition, fees (including any additional charges associated with verification of student identity), books, materials, travel for any on-site clinical or internship requirements, and refund policy;
  - c. requisite skills for using technology tools (websites, software, and hardware) that are clearly stated and reinforced through admissions, orientation, and matriculation;
  - d. processes for authenticating student identification;
  - e. information regarding what students need to be successful in the program, including pre-requisites, technology, internet connection, and expected amount of engagement per week or per term;
  - f. expectations for students' engagement as active learners with learning resources, faculty, other students, and assignments as appropriate;
  - g. support services available to students; and
  - h. information about professional licensure requirements, where appropriate, and advice on licensing in the state(s) of intended employment.
9. Students are oriented in ways suitable to the student body, in stages tailored to the backgrounds and needs of students, varying as germane by program and degree level.
- a. Orientation is provided to the learning environment; to technology; to academic resources; to support for students (including advising, tutoring, mentoring, coaching, accessibility); and to special opportunities for students.
  - b. Orientation includes opportunities for students to demonstrate their competence with the technology and learning format used in courses.

### **Academic Programs**

10. The academic team includes individuals with expertise in the subject-matter, instructional design, interaction with students, and assessment of student learning.
11. The institution collects, analyzes, and uses data on student engagement, achievement, and feedback for improvement of the academic program and of student success.
12. Institutions that offer the same program in multiple modalities ensure learning outcomes and levels of student achievement are comparable across modalities.
13. Learning activities and assessments are aligned with measurable learning outcomes. Formative and summative assessments of student learning provide feedback to students and serve as a basis for program improvement.

### **Support for Students**

14. Academic and support staff who interact with students are able to guide them to the range of support services offered by the institution.

15. Continuing support helps students develop as engaged learners, with the information and skills to seek special opportunities to enhance their success.
16. Academic and student support services are available remotely, easy to access, and available at times when students need them.
17. Collective responsibility for student success is accepted by academic, technical, and student support staff.

### **Program Review**

18. Programs offered through distance learning are reviewed on a regular cycle that includes external perspectives. Reviews are informed by empirical evidence including feedback from students and graduates about the academic program and information about graduates' success (e.g., employment and further education).
19. The institution documents improvements made as a result of the program reviews and other feedback.

### **Academic and Institutional Integrity**

20. The institution promotes a culture of academic integrity. The process for addressing academic integrity issues is clearly outlined by the institution and includes the opportunity for appeal.
21. Distance learning programs are appropriately integrated into the academic, administrative, and governance systems of the institution.
22. Learning outcomes are clear to prospective students and the public.
23. The institution demonstrates its understanding of the requirements and obligations of participation in NC-SARA, such as SARA consumer protection provisions.

*Note: This item is the responsibility of the states.*

## Appendix A: Participants and Partners

NC-SARA and NCHEMS are grateful to everyone involved in this initiative for their time and expertise in the development of these proposed *21<sup>st</sup> Century Guidelines for Distance Education*.

### Interviewees

Deb Adair, Quality Matters  
Meg Benke, SUNY Empire State College  
Melanie Booth, NC-SARA (previously WASC Senior College and University Commission)  
Deb Bushway, Northwestern Health Sciences University  
Chris Bustamante, Rio Salado College, AZ  
Myk Garn, University System of Georgia  
Dale Johnson, Arizona State University  
Leah Matthews, Distance Education Accrediting Commission  
John Opper, Florida Virtual Campus  
Hae Okimoto, University of Hawaii  
Russ Poulin, WICHE Cooperative for Educational Technologies (WCET)  
Pam Quinn, Dallas County Community College District  
Ken Sauer, Indiana Commission for Higher Education  
Kay Shattuck, Penn State and Quality Matters  
Peter Shea, SUNY Albany, NY  
George Siemens, Texas Center for Educational Technology  
Linda Smarzik, Austin Community College District, TX  
Burck Smith, StraighterLine  
Peter Smith, University of Maryland Global Campus  
Vernon Smith, American Public University System  
Karen Solomon, Higher Learning Commission  
Karen Swan, University of Illinois, Springfield  
Candace Thille, Stanford University and Amazon

### Reviewers

Deb Adair, Quality Matters  
Rob Anderson, State Higher Education Executive Officers Association  
Ulrik Juul Christensen, Area9 Lyceum  
Laurie Dodge, Brandman University  
Judith Eaton, Council for Higher Education Accreditation  
Julie Porosky Hamlin, MarylandOnline  
Leah Matthews, Distance Education Accrediting Commission  
Scott Pulsipher, Western Governors University  
Ray Schroeder, UPCEA  
Karen Solomon, Higher Learning Commission  
Linda Thor, Maricopa County Community College District Board of Governors  
Robin Walton, Thomas Edison State University, NJ  
Belle Wheelan, Southern Association of Colleges and Schools Commission on Colleges  
Darlene Williams, Northwestern State University, LA

## Appendix B: Comments from Participants

**Deb Adair**, Executive Director – Quality Matters

*Thank you for your work on this and your commitment to improve these guidelines which will enhance the quality of the student learning experience in distance education programs.*

**Laurie Dodge**, Vice Chancellor of Institutional Assessment and Planning Vice Provost, Brandman University

*Thank you for the opportunity to provide feedback on the Distance Learning Guidelines. First, I wish to thank each of you for taking this bold and needed step. Much of the world in teaching and learning and supporting technology has changed over the past 10 years in addition to the new federal regulations. So your timing is perfect!*

**Michale McComis**, Executive Director, Accrediting Commission of Career Schools and Colleges

*The 21<sup>st</sup> Century Guidelines for Distance Learning represent a comprehensive set of best practices that when woven into the fabric of educational practice yield an enhanced opportunity for quality learning and student success.*

**Scott Pulsipher**, President, Western Governors University

*I appreciate the enormity of the undertaking in which you are engaged, and your continued support of innovation.*

**Ray Schroeder**, Associate Vice Chancellor for Online Learning, University of Illinois Springfield; Senior Fellow, UPCEA

*I applaud NC-SARA and NCHEMS for the initiative to create a new list of guidelines that may take the place of the well-worn C-RAC guidelines as they apply to national standards for interstate offering of postsecondary distance education. This list is far superior to the prior aging recommendations in addressing a number of continuing considerations as well as those that have arisen in the past decade.*

**Peter Smith**, Orkand Chair and Professor of Innovative Practices in Higher Education, University of Maryland Global Campus

*These guidelines anticipate the next generation of distance education. They recognize that we are entering a time when effectiveness, learner-centered practices, and data analytics will supersede the delivery model as the determinants of quality.*

**Linda Thor**, Member, Maricopa Community Colleges Governing Board; President Emeritus, Rio Salado College; Chancellor Emeritus, Foothill-De Anza Community College District

*I have reviewed the draft distance learning guidelines and think that they are very well done, comprehensive, and generally clear . . . Thank you for the opportunity to be a small part of this important project.*

**Belle Wheelan**, President, SACSCOC

*I believe they add some much needed 'meat' to the C-RAC bones that were used in the past.*

**Frank Yamada**, Executive Director, The Association of Theological Schools

*The Guidelines address the many various forms of institutions while providing common principles of quality in distance learning. They clearly articulate areas of institutional capacity required for schools to plan for, develop, and assess the resources and processes needed to work for continuous improvement in distance learning. The guidelines integrate well-established principles of educational quality throughout. The emphasis, as well, on clear support for students in distance learning is a strength of The Guidelines . . . For accreditors, it is very helpful to read in the Introduction that they are "designed to inform but not limit accreditors in their judgement of satisfactory levels of quality in the offering of programs through distance learning." That reinforces our distinctive roles. The Guidelines also demonstrate a nice dual emphasis on institutions and students. They should prove very useful.*



## Appendix C: About NC-SARA and NCHEMS

### About NC-SARA

[NC-SARA](#) is a nonprofit organization that helps expand students' access to postsecondary educational opportunities and ensures more efficient, consistent, and effective regulation of interstate distance education. The organization serves as a national leader in enhancing quality and important student consumer protections in by helping states, institutions, policymakers, and students understand the value of and requirements for institutions participating in State Authorization Reciprocity Agreements (SARA).

### About SARA

SARA is a set of agreements between member states, districts, and territories that establishes comparable national standards for interstate distance education program offerings. These reciprocity agreements help streamline distance education regulations, improve coordination between states and higher education institutions, and also help ensure member states and participating institutions adhere to a set of important consumer protections for students. As of January 2021, roughly 90% of all U.S. postsecondary institutions that offer distance education programs (2,200+ institutions) voluntarily participate in these agreements across 49 member states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. More than 3 million students are enrolled exclusively in distance education programs offered by SARA-participating institutions.

### About NCHEMS

[NCHEMS](#) is a private, nonprofit organization whose mission is to improve strategic decision making and practices in post-secondary education for states, systems, institutions, and work-force development organizations in the United States and abroad. NCHEMS carries out cutting edge research, strategic advising, and offers technical assistance to allow for more sustainable and successful service to learners. NC-SARA commissioned NCHEMS to undertake the research and development of this initiative. The NCHEMS' team included Sally Johnstone, NCHEMS' president and a long-time distance learning practitioner and researcher; Barbara Brittingham, President Emerita of a regional accrediting commission; and Sarah Torres Lugo, NCHEMS' researcher.